

Goudhurst Neighbourhood Plan



Habitats Regulation Assessment Screening Report

Final Report
December 2018

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1 Introduction

1.1 Background

1.1.1 This Habitats Regulations Assessment (HRA) screening report has been undertaken by Tunbridge Wells Borough Council. It concerns the Goudhurst Neighbourhood Plan which has been produced by Goudhurst Parish Council in accordance with the Neighbourhood Planning (General) Regulations 2012.

1.1.2 The vision of the Goudhurst Neighbourhood Plan is that:

'Goudhurst Parish in 2033 will be a vibrant neighbourhood, containing hilltop settlements that are safe, balanced communities, with sustainable housing standards, good local services, business opportunities, managed traffic and walkable roads – a neighbourhood that supports change and development yet remains quiet and unspoilt'.

1.1.3 In addition, the parish has developed objectives pertaining to the following key topics:

- Landscape and environment
- Community and wellbeing
- Housing
- Business and employment
- Design
- Traffic and transport

1.1.4 The aim of this HRA screening report is to assess whether this Neighbourhood Plan would cause any likely significant effects on European sites.

1.1.5 Previous studies have determined that there are two European Sites that could potentially be impacted upon by development activities with Tunbridge Wells Borough. These are the Ashdown Forest Special Protection Area (SPA) and the Ashdown Forest Special Area of Conservation (SAC) and Natura 2000 site. The potential impacts from development on these two sites have been determined by HRA work by Tunbridge Wells Borough and other Local Authorities and relate to recreational disturbance and atmospheric pollution.

1.1.6 The boundary of the Ashdown Forest SAC/SPA lies outside the borough in Wealden District and is approximately 17km west of the boundary of Goudhurst Goudhurst (Appendix A).

1.2 Legislation and Guidance

- 1.2.1 The Natura 2000 network consists of sites across Europe designated for their nature conservation importance. The Network is formed of Special Areas of Conservation for species, plants and habitats and Special Protection Areas for bird species.
- 1.2.2 Special Areas of Conservation (SACs) are designated under the European Council Directive 92/43/EEC on the conservation of natural habitats and of wild fauna and flora (the 'Habitats Directive'). Special Protection Areas (SPAs) are classified under the European Council Directive 2009/147/EC on the conservation of wild birds (the 'Birds Directive').
- 1.2.3 To help protect the Natura 2000 network, there are particular requirements for plans and projects. Article 6(3) of the Habitats Directive states:

'Any plan or project not directly connected with or necessary to the management of the site but likely to have a significant effect thereon, either individually or in combination with other plans or projects, shall be subject to appropriate assessment of its implications for the site in view of the site's conservation objectives. In the light of the conclusions of the assessment of the implications for the site and subject to the provisions of paragraph 4, the competent national authorities shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the site concerned and, if appropriate, after having obtained the opinion of the general public'.

- 1.2.4 The Conservation of Habitats and Species Regulations 2010 (the 'Habitats Regulations'), the UK's transposition of the Habitats Directive and Regulation 102, provides:

'(1) Where a land use plan –

(a) is likely to have a significant effect on a European site or a European offshore marine site (either alone or in combination with other plans or projects), and

(b) is not directly connected with or necessary to the management of the site,

the plan-making authority for that plan must, before the plan is given effect, make an appropriate assessment of the implications for the site in view of that site's conservation objectives'.

- 1.2.5 This means that any proposed plan that may affect a European site (Special Area of Conservation or Special Protection Area) must first undergo an assessment to look at its potential impacts applying the precautionary principle. The assessment determines if the plan will adversely affect the integrity of the European site(s) concerned. This process is known as a Habitats Regulations Assessment and the first stage considers any likely significant effects (the screening stage). Following the 2018 *People over Wind* ruling, mitigation measures cannot be applied at the screening stage in order to rule out likely

significant effects and thus prevent the plan progressing to the second stage (appropriate assessment).

- 1.2.6 Where likely significant effects are identified at the screening stage, the second stage of the HRA process is triggered. The appropriate assessment looks at the implications of a plan for a European site in view of the site's conservation objectives. Further more, mitigation measures may be introduced at the appropriate assessment stage to avoid or reduce the effects of a plan on the European site(s). Before a plan may be given effect, the plan-making authority as competent authority must ascertain that it would not adversely affect the integrity of the European site(s).
- 1.2.7 In terms of neighbourhood plans, the Neighbourhood Planning (General) Regulations 2012 require a submitted neighbourhood plan to include a statement explaining how the proposed neighbourhood development plan meets the basic conditions set out in paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990³. One of these basic conditions is that the neighbourhood plan must be compatible with EU obligations and needs to demonstrate that it is not likely to have a significant effect on a European site.

2 Current Approach

2.1 Protection Zone

- 2.1.1 Data analysis of visitor access patterns found that the majority of regular visitors to the Ashdown Forest originated from within a 7km of the Ashdown Forest. Within this 7km 'zone of influence', measures to reduce recreational pressure would be most effective; therefore, it was determined that residential development leading to a net increase in dwellings in this zone would need to contribute to an appropriate level of mitigation.
- 2.1.2 An assessment of reasonable alternatives to the 7km zone of influence and options for mitigation was made in the Site Allocations DPD Sustainability Appraisal (incorporating Strategic Environmental Assessment)¹. It is considered that this assessment can be applied to the HRAs for neighbourhood plans.

2.2 Partnership Working

- 2.2.1 The Ashdown Forest lies within Wealden District and adjacent to the north-east boundary of Mid Sussex. Parts of Tunbridge Wells, Lewes, Tandridge and Sevenoaks Districts are also within or close to the zone of influence.
- 2.2.2 Tunbridge Wells has worked closely with both Natural England and other Local Authorities affected by the SPA/SAC to mitigate, where necessary, the two impacts that have been determined to significantly affect the Ashdown Forest: air quality and visitor pressure. For example, dependent on the extent of impact, mitigation funded by developers for visitor pressure to date has involved a combination of:
- (1) Providing a Suitable Alternative Natural Greenspace (SANG) on appropriate development sites
 - (2) Formation of a Strategic Access Management and Monitoring (SAMM) strategy.

¹ http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0003/101577/TWBC_PS_21a_HearingMatter-A6_Addendum.pdf

2.3 Practice Note

- 2.3.1 At present, Tunbridge Wells implements a practice note (Appendix B) which details the approach the authority is taking with regard to protection of the Ashdown Forest.
- 2.3.2 The practice note is particularly relevant for planning applications and describes how the HRA process should be undertaken for development falling within or close to the 7km protection zone.
- 2.3.3 The Council's HRA has shown that mitigation for development outside of the protection zone is not justified.

2.4 Site Allocations DPD

- 2.4.1 The potential effects of development on Ashdown Forest were assessed during the HRA process for the Site Allocations DPD. The screening exercise took place between Feb 2013 – Nov 2014 and found that there would be no likely significant effects on the Ashdown Forest SPA as a result of increased recreational activity or vehicle movements arising from new residential development and related population growth.
- 2.4.2 The in combination effect was also deemed to be trivial and therefore not likely to lead to significant effects².
- 2.4.3 The HRA was tested and accepted at Examination and the DPD was formally adopted in July 2016.

² http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0003/84252/Habitat-Regulations-Assessment-2014.pdf

3 Screening Assessment

3.1 Key Questions

3.1.1 This screening assessment has regard to the conservation objectives of the Ashdown Forest SPA and SAC. It also makes reference to other plans and projects; namely, the Site Allocations DPD, the emerging new Local Plan (2013-2033) and other neighbourhood plans in Tunbridge Wells Borough.

3.1.2 Key questions relating to the neighbourhood plan are included in Table 1 below and, along with the screening assessment, help to establish if an appropriate assessment is required.

Table 1. Key questions relating to the Neighbourhood Plan

Key Questions		Y/N	Comments
1	Is the plan connected with or necessary to the management of the Ashdown Forest?	N	The plan has no direct connection to the way in which the Ashdown Forest is managed.
2	Does the plan propose new development or allocation sites for development?	N	The Neighbourhood Plan shows preference for the type and form of development at local level but does not allocate land for a specific purpose.
3	Are there any other projects or plans that together with the Goudhurst Neighbourhood Plan, could impact upon the integrity of a European site (a.k.a. the 'in combination effect')?	N	Plans with the potential to create in combination effects include the numerous Neighbourhood Plans in the Borough of Tunbridge Wells that are currently under development, the Site Allocations DPD and the new Local Plan which is also currently under development. Windfall sites could also have an influence. However, because Goudhurst Parish is well outside the protection zone and only guiding the type and form of development, it is highly unlikely that in combination effects of this sort will be observed.

3.2 Assessment of Policies

3.2.1 For it to be concluded that a policy would have no likely significant effect on a European site, one of the reasons listed in Figure 1 usually applies.


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- (A) The policy is intended to protect the natural environment, including biodiversity, or to conserve or enhance the natural, built or historic environment, where enhancement measures will not be likely to have any negative effect on a European site;
 - (B) The policy will not itself lead to development or other change, for example, because they relate to design or other qualitative criteria for development or other kinds of change;
 - (C) The policy makes provision for change which has no conceivable effect on a European site, because there is no link or pathway between them and the qualifying interests, or any effect would be a positive effect, or would not otherwise undermine the conservation objectives for the site;
 - (D) The policy makes provision for change which has no significant effect on a European site, because any potential effects would be insignificant, being so restricted or remote from the site that they would not undermine the conservation objectives for the site;
 - (E) The policy for which effects on any particular European site cannot be identified, because the policy is too general, for example, it is not possible to identify where, when or how the policy may be implemented, or where effects may occur, or which sites, if any, may be affected.

Figure 1. Common reasons why likely significant effects are not expected.

3.2.2 Table 2 below illustrates the findings of the screening assessment for each of the policies within the Goudhurst Neighbourhood Plan with reference to each of the 5 reasons above where applicable. This assessment determines whether there is a likely significant effect from these policies on the Ashdown Forest SPA and SAC.

Table 2. Assessment of Policies within the Neighbourhood Plan

Neighbourhood Plan Policy			Likely Significant Effects on SPA/SAC?	
Ref	Title	Policy	Y/N	Explanation
L1	Development within the AONB	Proposals for development in the AONB will be permitted only where they satisfy the objectives of the High Weald Area of Outstanding Natural Beauty Management Plan.	N	This policy intends to protect the environment. Reason A
L2	Development adjacent to the AONB	Where development is proposed outside of the AONB it must not damage or detract from the environment, character and landscape setting of the AONB.	N	This policy intends to protect the environment. Reason A
L3	Retain the profile of our hilltop villages	Development must not alter the profiles of the three hilltop settlements (Goudhurst, Kilndown and Curtisden Green), as seen from the surrounding countryside.	N	This policy intends to protect the environment. Reason A
L4	Conserve Landscape and Heritage Assets	Development must conserve the unique historic landscape of the Parish and the settings of its heritage assets.	N	This policy intends to protect the environment. Reason A
L5	Retention of the gap between Goudhurst LBDs	Proposals that maintain the separate identity and character of the two Goudhurst settlements and prevent their coalescence or the erosion of the undeveloped gaps will be supported.	N	This policy intends to protect the environment. Reason A
L6	Biodiversity	Development that would result in a loss of biodiversity will, in general, not be permitted. Where loss is unavoidable proposals may be considered to: 1. mitigate that loss; or 2. compensate for that loss, resulting, where possible, in a net enhancement to biodiversity within the Parish	N	This policy intends to protect the environment. Reason A

L7	Trees	Proposals must retain ancient woodland, ancient trees or veteran trees of arboricultural and amenity value and development that damages or results in the loss of the above will not be permitted unless there are wholly exceptional circumstances. Proposals must be accompanied by a tree survey that establishes the health and longevity of any affected trees. Where it is agreed that it is impossible to retain a tree a replacement of similar species must be planted.	N	This policy intends to protect the environment. Reason A
L8	Light Pollution	Approval is required for all external lighting schemes including temporary lighting and lighting of sports facilities. All lighting should be minimised in power and duration and designed to minimise light spill. All relevant development requires the approval of all external lighting with a lighting plan to minimise impact. Proposals will be refused, unless it can be shown as beneficial to the community, essential and must have regard to current guidelines established for the High Weald AONB and TWBC policy EN8.	N	This policy intends to protect the environment. Reason A
L9	Green Spaces	Development that results in the loss or degradation of Green Spaces will be considered only in wholly exceptional circumstances. Larger developments should be designed to provide new green amenity spaces, reflecting and extending the existing network of accessible green space running through the Parish.	N	It is highly unlikely that this policy will reduce visitor pressure on the Ashdown Forest which has unique features the local countryside can not replicate. This policy intends to protect the local environment. Reasons A and D
L10	Views	Development must not cause any loss or diminution of important views into and out of the settlements from any area to which the public has access.	N	Protecting views around the parish will have no significant impact on the Ashdown Forest. Reason A

C1	Community Facilities and Amenities	Developments that incorporate proposals for improved or additional amenities and facilities within the Parish will, in general, be supported.	N	Improving or adding to the existing facilities and amenities will have no significant impact upon the Ashdown Forest. Reason D
C2	Accessibility	Developments that incorporate proposals to create or improve accessibility to amenities and facilities within the Parish for all sectors of society will be supported. Development that adversely affects the above will be rejected.	N	Creating or improving accessibility within the Parish will have no significant impact upon the Ashdown Forest. Reason D
C3	Developer Contribution	Where a developer contribution is appropriate, the Parish Council, in consultation with residents and taking account of projects in this plan, will identify requirements and the developer should either; 1. Provide, or contribute to, the identified requirements on site; or 2. Fund, or directly deliver, off site facilities within the Parish.	N	Contributions are not yet specified and thus impacts upon the Ashdown Forest cannot be identified. However, it seems unlikely that contributions for a small community would deliver changes that could negatively impact upon the Ashdown Forest. Reasons D and E
C4	Assets of Value to the Community	Development proposals that will result in the total, or partial, loss of an asset or amenity that is of value to our community will not be supported.	N	Protecting against the loss of assets is unlikely to have a significant effect on the Ashdown Forest. Reason D
C5	Broadband and mobile infrastructure	Development proposals that seek to expand the Electronic Communication Networks and high speed broadband, along with improvements to connectivity, that benefit the Parish will be supported where: (i) the applicant has demonstrated that there are no opportunities to erect apparatus on existing buildings, masts or other structures; and (ii) the numbers of radio and telecommunication masts are kept to a minimum, consistent with the efficient operation of the network; and (iii) the development has been sited and designed to minimise the impact on the character and appearance of the AONB.	N	Compliance with this policy would ensure any impacts would be localised to Goudhurst and the surrounds only. Reason C

H1	Housing Mix	To support sustainable communities and to reflect current and future local housing needs, all housing developments are expected to provide a mix of dwellings that fall within the following ranges subject to viability considerations: • A minimum of 40% of dwellings to be 1- and 2-bed, with a balance of both • 20%-40% of dwellings to be 3-bed • A maximum of 15% of dwellings to be 4+-bed dwellings An alternative mix will only be permitted if a robust justification is provided to the satisfaction of the local planning authority that the scheme would reflect the most up to date housing needs evidence available.	N	This policy influences the mix of future housing only. Reason B
H2	Tenure Mix	Proposals for development must reflect local housing need and 25% of all dwellings must be provided as affordable homes in all developments delivering 5 or more dwellings.	N	This policy influences the mix of future housing only. Reason B
H3	Allocating Affordable Housing	All new affordable housing in Goudhurst will initially be subject to a strong local connection requirement and subject to an agreement which will ensure that it remains as affordable housing for people with a strong local connection in perpetuity. Where nobody demonstrating a strong local connection as defined here applies for residence in the dwelling it may be offered to persons whose housing needs are not met by the market and who meets one of the criteria; and failing that to someone who meets two of the criteria in relation to another Parish within the TWBC area.	N	This policy influences the mix of future housing only. Reason B
H4	Rural Exception Sites	Proposals for the development of small-scale affordable housing schemes on Rural Exception Sites on the edge of one of the three settlements in the Parish where housing would not normally be permitted by other policies, will in general be supported.	N	This policy guides development to specific settlement fringe locations. As preference in these locations is for small-scale development only, it is unlikely to impact significantly upon the Ashdown Forest. Reason D

H5	Replacement Dwellings	<p>The replacement of existing dwelling units should only be permitted only where the existing building has established and continuing residential use rights and the current building is unstable or uneconomic to repair. All other policies set out in this plan will apply and in addition the following criteria must be met: 1. the footprint of the replacement building does not exceed the total volume of the original building plus the additional volume that could be generated using the maximum limits imposed for extensions under permitted development; 2. the location of the replacement building is situated to coincide in whole or part with the position of the original building unless an alternative location within the existing curtilage of the property would reduce the visual impact of the building from areas to which the public have access or facilitate the necessary realignment of a public highway. Such development may be subject to conditions.</p>	N	<p>This policy considers near like for like replacement. Effects on the Ashdown Forest, if any, will be neutral.</p> <p>Reason D</p>
H6	Conversion of existing buildings	<p>Planning permission will in general be granted for the conversion of existing properties to alternative uses provided:</p> <ol style="list-style-type: none"> 1. The proposed conversion will not materially adversely affect the character and amenities of the surrounding area or the building itself. 2. It does not result in the loss of village amenity. Proposals for the conversion of buildings not in residential use will need to be compatible with other relevant policies and the above criteria. 	N	<p>This policy is designed to conserve the historic environment and existing village amenities and is unlikely to have a significant effect on the Ashdown Forest.</p> <p>Reasons A and D</p>

B1	New business space	<p>The change of use to other employment, commercial or business uses, or the extension of buildings in employment, commercial or business uses will in general be supported. Planning permission for new business space and tourism facilities will be considered in the following circumstances: 1. The change of use of a rural building to business or tourist use 2. A new building for business or tourist uses 3. A proportionate extension of an existing building for business or tourist use on a scale appropriate to the settlement or in the open countryside: a) where associated with a farm diversification scheme or an existing employment site; or b) otherwise, including on all isolated sites, only where the development can be shown to be making a positive contribution to its setting in the open countryside and to the purpose of designation of the High Weald AONB.</p>	N	<p>This policy is designed to control business expansion.</p> <p>Business is expected to be small scale thus any additional freight movements created through the Ashdown Forest would likely have insignificant effects.</p> <p>Reason D</p>
B2	Retention of business premises	<p>Support will be given to the retention of retail shops (A1) against any proposals for redevelopment or change of use.</p> <p>For all business premises, the change of use to other employment, commercial or business uses, or the extension of, buildings in employment, commercial or business uses will be supported. Planning applications that result in the loss of retail (Use Classes A1), services (Use Classes A3-A5), commercial (Use Classes B1 (excluding B1a Office, B2 and B8), or hotel/bed and breakfast (Class C1) uses (excluding premises which are also private dwellings) will be refused unless it can be demonstrated by: I. At least two independent valuation reports and II. a public active marketing campaign for a continuous period of at least eighteen months that the premises cannot be sold or let on any basis for either reoccupation or redevelopment for employment generating uses.</p>	N	<p>This policy aims to support existing and new business. Where existing business is concerned, implementing this policy is likely to have a neutral impact upon the Ashdown Forest.</p> <p>Any new business proposals are expected to be small scale thus any additional freight movements created through the Ashdown Forest would likely have insignificant effects.</p> <p>Reason D</p>

B3	Adaption for live/work	<p>Conversion of properties for live/work should generally be supported but restrictions on future use may be placed on the property. Planning permission for office or light industrial uses will be considered: 1. for the use of part of a building 2. for small-scale free-standing buildings within its curtilage 3. extensions to the building, or conversion of outbuildings In all cases permission should be granted provided that: a) all work activities are carried out in the main by the occupants of the dwelling; b) no significant and adverse impact arises to nearby residents or other sensitive land-uses from noise, fumes, odour or other nuisance associated with the work activity; c) there is no net loss of any dwellings; d) additional buildings, extensions or conversions should not detract from the quality and character of the building to which they are subservient by reason of height, scale, massing, location or the facing materials used in their construction; and e) the employment element does not adversely impact upon road safety or substantially increase traffic volume f) adequate parking can be provided</p>	N	<p>Amongst other things, this policy aims to avoid an increase in traffic volume. As such, it is expected to have an insignificant impact upon the Ashdown Forest.</p> <p>Reason D</p>
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D1	Design standards	<p>All proposals for development must achieve a high quality of design and demonstrate how they complement local vernacular, distinctiveness and the aesthetic qualities of traditional rural settlements and buildings found in the Kent High Weald AONB, in particular by: a) respecting/complementing in scale and form the character of existing buildings in the locality; b) respecting established building lines and arrangements of rooflines, front gardens, and boundary treatments c) using good quality materials that complement the existing palette of materials and fall within the High Weald colour palette; d) meeting the requirements of 'Secure by Design' to minimise the likelihood and fear of crime; e) adopting innovation to achieve sustainable low carbon energy design; f) integrating renewable energy technologies - including in the re-use of rain and grey water; g) providing sufficient external amenity space, refuse and recycling storage and car and bicycle parking to ensure a high quality and well managed streetscape; and h) providing access for people with restricted mobility. i) new development should enhance local ecology by incorporating bird and bat boxes/bricks into new buildings. j) on-plot parking should be screened from the road and care should be taken when designing hard standing areas k) driveways should be a fully permeable surface. Applications proposing development contrary to the above will not be supported.</p>	N	<p>This policy is designed to protect the natural and historic environment and relates to design only.</p> <p>Reasons A and B</p>
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D2	Boundary treatments	<p>Hedges will be preferred over fencing. Outside the settlements hedges make the most appropriate boundary and native species of planting, such as a traditional mixed hedge of hawthorn, field maple, beech, and hornbeam should be used and may include trees such as oak, cherry or ash. Within the settlements other traditional urban hedges (privet, box etc.) or shrubs such <i>escallonia</i>, <i>viburnum</i>, and <i>elaagnus</i> may be grown as attractive garden boundary hedges. Intrusive fences and ornate gates with imposing pillars are to be avoided. If fencing is to be used then post and rail or low wooden fencing and green hedging should be used. High or close-board fencing in frontages will also be discouraged in favour of softer treatments.</p>	N	<p>The boundary treatments referred to within this policy would be so distant from the Ashdown Forest that impacts would be insignificant.</p> <p>Reason D</p>
D3	Climate change	<p>All new development should seek to achieve high standards of sustainability and, in particular, demonstrate in proposals how design, construction and operation will: 1. Reduce the use of fossil fuels. 2. Promote the efficient use of natural resources, the re-use and recycling of resources, and the production and consumption of renewable energy. 3. Adopt and facilitate the flexible development of low and zero carbon energy through a range of technologies. 4. Link the provision of low and zero carbon energy infrastructure in new developments to existing buildings; 5. Adopt best practice in sustainable urban drainage</p>	N	<p>This policy is designed to protect the natural environment via mitigation of climate change impacts. Compliance with this policy will have no significant impact on the Ashdown Forest.</p> <p>Reason A</p>

D4	Inside the Conservation Areas	<p>In addition to policy D1, proposals for development in a Conservation Area should preserve or enhance the special character of the area and be designed to respond to existing scale, height, form and massing, respecting the traditional pattern of frontages, vertical or horizontal emphasis, detailing and materials of the immediate area. There are no permitted development rights within the conservation area. There will be a presumption in favour of retaining buildings which make a positive contribution to the character or appearance of Conservation Areas. Redevelopment which involves the demolition of an existing building (or part thereof) within a Conservation Area will be permitted only where: a) the alternative development preserves or enhances the character or appearance of the conservation area, and b) the building (being demolished) makes no positive contribution towards the character or appearance of the Conservation Area. All applications for development within the Conservation areas must be accompanied by a positive Heritage Assessment, and a detailed Design and Access statement showing how the proposal complies with these expectations.</p>	N	<p>This policy intends to protect the historic environment and is not expected to impact upon the Ashdown Forest.</p> <p>Reason A</p>
D5	Outside the Conservation Areas	<p>Outside conservation areas Development must be designed to: 1. Respect the setting of listed buildings, other historic buildings/Heritage Assets/conservation areas 2. Have regard to scale, height, massing, alignment and the use of appropriate materials 3. Retain the spaces between and the grouping of buildings and the elements of the landscape which form their setting.</p>	N	<p>This policy intends to protect the historic environment and is not expected to impact upon the Ashdown Forest.</p> <p>Reason A</p>

D6	Extensions	Extensions to buildings must: 1. respect the overall design, size, appearance, scale, height and mass of the host dwelling and remain visually and functionally subservient to it; 2. use external facing materials to match or complement the materials of the host dwelling; 3. ensure no significant and adverse impact on the amenity of neighbouring residents; 4. ensure that the cumulative effect of such extensions, viewed from the surrounding area, is acceptable; and 5. ensure the effects of any significant increased run-off from rainwater arising from any additional hard surfaced area created by the extension can be adequately mitigated.	N	<p>This policy concerns the scale and design of extensions of existing buildings. It is unlikely to impact upon the Ashdown Forest.</p> <p>Reason B</p>
T1	Car parking	Proposals for new homes in the Parish must provide for one off-street parking space for each bedroom.	N	<p>Most visitors to the Ashdown Forest travel by private car. However, surveys show an extremely low number of visitors to the Ashdown Forest live in Goudhurst. Thus, even with increased provision for private cars ,it seems unlikely that an associated increase in visitor pressure would follow.</p> <p>Reason D</p>

T2	Safe Access and Sustainable Transport	<p>Housing development proposals will be favourably supported where the development: I. incorporates measures to facilitate the safe access for children to Goudhurst and Kilndown Primary School, pre-school sites and local secondary schools on foot, by bicycle, school bus or car; II. integrates with existing or proposed footpaths, footways and cycle routes, ensuring that residents can walk or cycle safely to schools, shops, green spaces and other Parish facilities; III. Facilitates access to public transport, thereby minimising the need for car use; and IV. Retains or improves existing footpaths and footways.</p> <p>Development that would result in the loss of existing footpaths and footways will be supported only if a suitable replacement or alternative route can be provided.</p>	N	<p>Most visitors to the Ashdown Forest travel by private car. Encouraging more sustainable transport options within Goudhurst will have no significant impact on the Ashdown Forest.</p> <p>Reason C</p>
T3	Traffic mitigation	<p>Development that will adversely impact on road safety or traffic volume within the Parish will be supported only if that impact can be mitigated by means of developer contributions to measures agreed with the Parish Council (in consultation with residents) and the highways authority.</p> <p>Traffic impact includes adverse road safety conditions, congestion and pollution on both the main roads and rural lanes.</p>	N	<p>This policy aims to reduce local traffic problems. Goudhurst is too distant from the Ashdown Forest for these effects to relieve traffic impacts.</p> <p>Reason D</p>
P1	Access to affordable housing	<p>The parish will consult with interested affordable housing providers regarding the feasibility of establishing a Goudhurst Community Land Trust and actively seek a site to deliver new affordable housing.</p>	N	<p>This aspect of the plan describes preparatory work and has no pathway or link to the Ashdown Forest.</p> <p>Reason C</p>
P2	Traffic, parking and road safety	<p>The parish will describe traffic issues and threats to road safety, research and campaign to implement solutions.</p>	N	<p>This aspect of the plan describes preparatory work and has no pathway or link to the Ashdown Forest.</p> <p>Reason C</p>

P3	Improving parish facilities	The parish will regenerate the community hall, explore wider community use and establish the need to care of the young and elderly.	N	This aspect of the plan describes preparatory work and has no pathway or link to the Ashdown Forest. Reason C
P4	Improving parish communication	The parish will provide a common communication tool.	N	This aspect of the plan describes preparatory work and has no pathway or link to the Ashdown Forest. Reason C
P5	Making use of developer contribution	The parish will identify ways in which activities identified for monetary support from Section 106 or CIL can be delivered.	N	This aspect of the plan describes preparatory work and has no pathway or link to the Ashdown Forest. Reason C

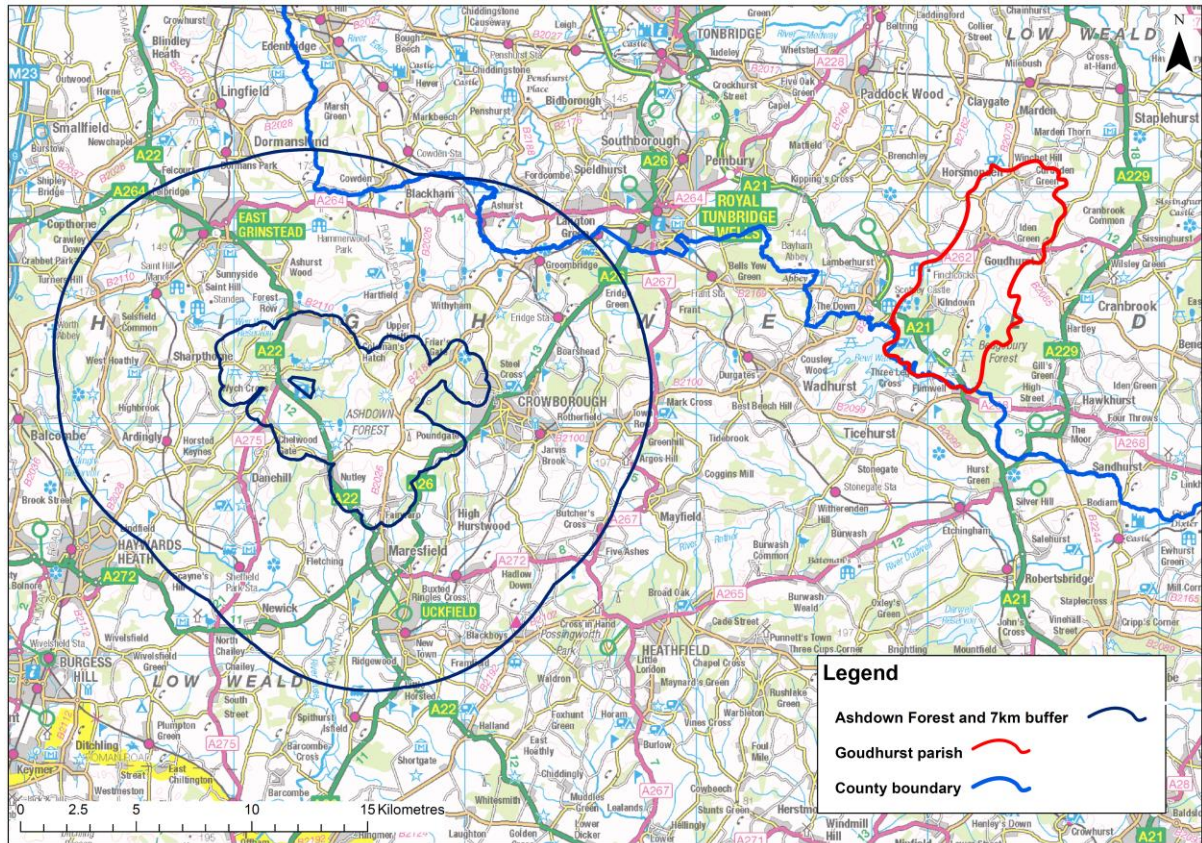
3.2.3 As can be seen in Table 2, no policies in the Goudhurst Neighbourhood Plan were found to have a likely significant effect alone on the Ashdown Forest SPA and SAC.

5 Conclusion

- 5.1.1 As a result of the assessment in Section 4, it is unlikely there will be any significant environmental effects arising from the Goudhurst Neighbourhood Plan. As such, the 'appropriate assessment' stage of the HRA process that ascertains the effect on integrity of the European Site) does not need to be undertaken. This conclusion was sent to Natural England for consideration and their response is included in Appendix C.

Appendix A

Ashdown Forest Protection Zone Map



Appendix B

HRA Practice Note (2018)

See Item - FC83/17 at following link:

<http://democracy.tunbridgewells.gov.uk/meetings/ieListDocuments.aspx?CId=134&MId=3920&Ver=4>

Appendix C

Consultation Response from Natural England

Date: 30 November 2018
Our ref: 264577



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BY EMAIL ONLY

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Dear Katie,

Thank you for consulting Natural England for comments on the Habitats Regulations Assessment (HRA) screening report for the Goudhurst Neighbourhood Plan.

I note that the submitted "Neighbourhood Plan shows preference for the type and form of development at a local level but does not allocate land for a specific purpose." Therefore, in terms of national and international habitats, we accept your conclusion that there are not likely to be significant effects, based on the current understanding of the possible location of proposed development in the context of the location and sensitivities of designated habitats (and landscapes).

If the Neighbourhood Plan changes (such as by the addition of site allocations) and there is the potential for environmental impacts, Strategic Environment Assessment and HRA screening exercises may need to be undertaken.

I hope you find these comments helpful. If there are issues I have not covered, please let me know and I will respond as quickly as possible.

Yours sincerely

Nicky Britton-Williams

