

Tunbridge Wells and Rusthall Commons Management Plan Update Draft Report, December 2016

Report structure and outline

Contents

1. Executive summary
2. Introduction – the Commons, the Conservators, purpose of plan
3. Rocks
4. Ponds
5. Grassland and wood pasture
6. Heathland
7. Woodland edges, glades and rides
8. Trees
9. Public amenity – grass mowing, paths, ditches, seats and litter bins
10. Dealing with problems – littering and damage, encroachment, danger to the public
11. Summary of maintenance recommendations
12. Summary of monitoring recommendations
13. Summary of project recommendations
14. Sources of support – volunteers, funding opportunities, expert bodies
15. Appendices, references and further information

1. Executive summary

Background

1.1 The current Commons management plan was adopted in 2005. At the Conservators' December 2015 meeting it was agreed that the Freehold Tenants should work with the Warden toward a new ten-year management plan, beginning by commissioning expert advice on: habitats and species conservation; ponds and wetlands; rock outcrops; and trees and woodland preservation and management. A series of expert reviews was carried out over the summer of 2016, as follows:

- Habitat management, focusing on grassland and heathland – the Kent High Weald Partnership
- Trees - The Living Forest
- Rocks – Freehold Tenants with guidance from Natural England
- Ponds – Calumma Ecological Services

1.2 The experts commented favourably from a conservation/ecological perspective on the Commons management regime, and did not suggest any radical change to current practice. They offered several improvement recommendations for consideration, most of which have resource implications. These were summarised in our interim report to the Conservators in September. Since September, the Freehold Tenants have worked with the Warden to prioritise the experts' recommendations, also considering public amenity needs and other demands. This report sets out an outline for the 2017-27 Management Plan, together with a summary of the projects the Freehold Tenants propose funding in 2017, for discussion at the December Conservators' meeting.

1.3 The Freehold Tenants and the Warden will consult further with the Clerk, Conservators and other key stakeholders and advisors (including Kent Wildlife Trust, TWBC, the Friends and others suggested by the Conservators) to develop the final Plan and implementation steps for adoption by the Conservators in March 2017.

Key recommendations

1.4 Our general recommendations are as follows:

- To continue the current management approach, with some enhancements. To that end, the prescriptions of the 1992 and 2005 management plans are still valid except where specific changes are recommended in this document.
- To agree, publish and implement multi-year rolling plans for management and maintenance (trees, rock outcrops, clearings/scrub reduction, ponds, ditches etc).
- To introduce regular monitoring and recording of key sites, features and habitats.
- Where possible, to increase reliance on (skilled) volunteers and look for more funding opportunities.

1.5 Specific habitat management recommendations, based on the expert advice, include:

- A phased programme of rock management, removing grass, shrubs and small trees and maintaining sightlines.
- A phased pond maintenance and clearance schedule.
- To focus heathland management in a small number of key heathland/heathy grassland areas. These will receive labour-intensive treatment.
- To introduce a second (early spring) cut in some grassland areas to reduce fertility.
- To ask contractors to vary the cut of grassland and wood pasture areas and leave random unmown patches to promote biodiversity. (this will require additional supervision, at least at first).
- To focus woodland edge management on south-facing woodland edges, rides and glades, aiming for a graduated structure by scalloping edges and rotational coppicing.
- Bespoke treatment to preserve specimen trees, depending on species.

- Clearing holly, sycamore and scrub around selected specimen trees.
- A phased programme to remove cherry laurel and rhododendron.

1.6 Specific recommendations to enhance the amenity value of the Commons include:

- A multi-year rotational programme of ditch clearance.
- Bringing forward the summer cut of some popular grassland areas which are not of high floristic value.
- Ensuring cut width is sufficient near paths, including potentially changing the width specifications for key paths.

1.7 There are no specific recommendations to change practices related to dealing with risks and nuisances, but we note the following pressures on the time and resources available:

- Litter collection – increased number of litter bins.
- Increasing requirement to install and renew posts and other barriers to prevent verge damage, parking, fly tipping, travellers' camps and other encroachments.
- Continuing requirement for reviews and work on roadside trees and to maintain sightlines.
- Demand for additional clearance near major paths for personal safety reasons.

1.8 To the extent possible within the resources available or through project funding, the Conservators should also consider the following longer term projects:

- selective thinning and pollarding in some areas of dense shade
- opportunities to expand acid grassland by cutting into the secondary woodland.
- additional reptile refugia/hibernacula.
- Creation of additional ponds.
- Clearance of additional rock outcrops.

Proposed 2017 projects

1.9 The Warden has commissioned work to scallop south-facing sections of the Tunbridge Wells Common racecourse, supported by Section 106 funding.

1.10A list of improvement projects proposed for implementation with funding from the Freehold Tenants will be presented separately to the Conservators following approval at the Freehold Tenants' AGM. In addition, the Freehold Tenants will commission further expert advice as required from Kent High Weald Partnership to assist the Warden to implement some of the detailed recommendations in this plan.

1.11The Friends are also proposing to support projects within the framework of the Management Plan, beginning with clearance work around the Cheesewring rock formation in Happy Valley.

2. Introduction – the Commons, the Conservators, purpose of plan

The Commons

- 2.1 Tunbridge Wells and Rusthall Commons extend over an area of 104 hectares to the south west of Tunbridge Wells town centre, presenting an excellent mosaic of valuable habitats in the heart of an urban area. The Commons are known for their sandstone outcrops such as the Toad Rock and the Wellington Rocks and have played an important part in the history and development of Tunbridge Wells.
- 2.2 Historically, the Commons developed as lowland heath. In the early 20th century the grazing that had maintained the landscape for many centuries died out, leaving scrub woodland to develop, replacing the heather and gorse that sustained the many specialised insects and animals that lived there. Since 1992, management of the Commons has sought to preserve the variety of habitats, maintain and extend the remaining open areas and improve access to promote biodiversity and enhance public amenity.
- 2.3 The freehold of the Commons is privately owned by the Manor of Rusthall, but their management is vested by Act of Parliament in the Commons Conservators.

The Conservators

- 2.4 Tunbridge Wells and Rusthall Commons are administered by the Commons Conservators. The Conservators were established by the Tunbridge Wells Improvement Act of 1890, when the town was incorporated and the borough wished to secure the preservation and management of the Commons for the benefit of the inhabitants of Tunbridge Wells. Their constitution, appointment and powers were re-defined under the County of Kent Act of 1981.
- 2.5 There are twelve Conservators in all. Four are appointed by the Manor of Rusthall, four are appointed from currently elected Borough Councillors and four are appointed by the Freehold Tenants of the Manor of Rusthall. The Conservators are supported by a part-time Clerk and Treasurer. Day to day management is the responsibility of a full-time Warden and a part-time Administrator.
- 2.6 The Conservators' duties under the 1981 Act are as follows:
 - To maintain and preserve the Commons; and
 - To maintain the Commons free from all encroachments.
- 2.7 The Conservators have powers to commission and carry out works to maintain and preserve the Commons, to permit temporary enclosures and encroachments, to set aside areas of the Commons for playing sports and games, to approve roads and paths, to appoint officers and to make byelaws.
- 2.8 Funding for the work of the Commons Conservators comes from an annual precept paid by Tunbridge Wells Borough Council. For the year of 2016/17 the precept is £145,000. Apart from salary and office costs, this money is mainly used to pay the contractors employed to cut the grass, clear litter and deal with fallen or dangerous trees. Where possible, habitat improvement projects such as pond restoration, clearance of rock outcrops and the creation of new grassland and heathland areas on both commons are undertaken, but in practice these projects are largely reliant on funding from donations and grants. The most important sources for such support are the Freehold Tenants and the Friends of the Commons. A small annual grant is made by Natural England in respect of the Rusthall Common SSSI and there are also regular individual donations for benches. A significant one-off source of funding in 2015-16 was a Section 106 mitigation payment in respect of a nearby housing development.
- 2.9 The Conservators have agreed a vision statement: "To manage Tunbridge Wells and Rusthall Commons as active Historic Commons using proven management methods to enhance the

biodiversity of the Commons and their role in promoting the well-being of local residents and the wider community.”

Management Plans

- 2.10 Following the damage to the Commons caused by the 1987 hurricane, the Conservators re-examined their approach to management of the Commons. A comprehensive ten- year Management Plan was commissioned from the Kent Wildlife Trust, and adopted in 1992. A further ten-year plan was adopted by the Conservators at the end of 2005. This is still being followed. (Annexes A2.1 and A2.2 provide links to the 1992 and 2005 management plans).
- 2.11 The original intention of the Conservators in drawing up the 1992 management plan was to return the Commons as far as possible to the open heathland that existed for hundreds of years, but had been lost in the twentieth century with the demise of grazing, and to encourage further biodiversity by creating appropriate habitats.
- 2.12 Overall the management of the Commons since 1992 has been successful in achieving the primary goal of preserving habitats and encouraging biodiversity (see the expert reports in the appendices for details). However, restoring the Commons to open heathland has proved more of a challenge. In such an urban area, it has not proved practicable to introduce the grazing regime required to restore large tracts of heathland, and this is no longer considered a viable management option. The existing relict heathland areas are under threat from scrub invasion.

2017 Management Plan update

- 2.13 At the Conservators’ December 2015 meeting it was agreed that the Freehold Tenants should work with the Warden toward a new ten-year management plan, beginning by commissioning expert advice on: habitats and species conservation; ponds and wetlands; rock outcrops; and trees and woodland preservation and management. A series of expert reviews was carried out over the summer of 2016, as follows:
- Habitat management, focusing on grassland and heathland – the Kent High Weald Partnership
 - Trees - The Living Forest
 - Rocks – the Freehold Tenants with guidance from Natural England
 - Ponds – Calumma Ecological Services
- 2.14 The experts’ recommendations were summarised in an interim report to the Conservators in September. Since that discussion, the Freehold Tenants have worked with the Warden to consolidate the experts’ recommendations into an actionable plan for the next ten years, also considering public amenity needs and other demands on time and resources. This draft 2017-27 Management Plan is now being tabled for further discussion at the December 2016 Conservators’ meeting.
- 2.15 After incorporating input from the Conservators on 1st December, the Freehold Tenants and Warden will continue consultation with the Clerk, Conservators and other key stakeholders and advisors (including Kent Wildlife Trust, the TWBC biodiversity officer and others at TWBC, the Friends and others) to develop a final version of the Plan and detailed implementation steps for adoption by the Conservators in March 2017.

Purpose of the 2017 Plan

- 2.16 The purpose of the 2017 Plan is to guide long-term decision-making and resource allocation in the absence of grazing and to serve as a basis for engaging stakeholders in the future of the Commons.

2.17 The plan continues to focus on habitat and biodiversity goals, in keeping with the Conservators' vision, but has also taken public amenity goals into consideration, as well as the requirement to maintain and preserve the Commons and ensure public safety.

2.18 In drawing up the plan, the authors were mindful of the Conservators' budget constraints. Most of the recommendations have relatively minor budget implications, although this will need to be assessed and confirmed over the coming months before the plan is finalised. We have indicated where goals are aspirational future projects requiring (external) funding.

3. Rocks

Summary/background

- 3.1 The recommendations in this section are based on a survey of rock formations on the Commons by the Freehold Tenants, drawing on advice from Natural England. They have been reviewed and agreed with the Natural England project officer responsible for the Rusthall SSSI. The principle underlying the recommendations is to keep the key rock formations in good condition and visible enough to be able to be enjoyed fully, whether aesthetically or for recreation.
- 3.2 Rock formations are key features on both Commons contributing to both habitat diversity and public enjoyment.
- 3.3 The rocks in the Toad Rock and Bulls Hollow area of Rusthall Common are designated as a Site of Special Scientific Interest (SSSI) under Section 28 of the Wildlife and Countryside Act 1981, requiring management in accordance with Natural England's guidelines and attracting a limited amount of grant funding. The SSSI citation describes them as: "a key site for sandstone weathering features, complementing the interest at High Rocks and Chiddingly Wood. Rusthall Common is best noted for the spectacular Toad Rock, a classic landform of SE England comprising an isolated block of rock standing on a narrow pedestal formed by periglacial wind erosion. The site also possesses more intensive cambering; better developed rock platforms or pavements, and much deeper weathering pits than other similar sites."
- 3.4 The current programme of rocks management and maintenance includes annual hand-strimming of some key sites and periodic clearance of vegetation on/around other rock formations, much of which is supported by project funding from the Freehold Tenants, the Friends and the grant from Natural England. Some clearance work is undertaken by volunteers from the Friends and a local mountaineering club, working under the supervision of the Warden.
- 3.5 Best practice management to keep the rocks in good condition and visible requires prioritisation of clearance and maintenance tasks as well as decisions on what to leave (e.g. mature significant trees). To minimise the perpetual work of managing vegetation it is important to prevent regrowth as much as possible. Therefore, treatment to prevent regrowth should be considered at the same time as vegetation is cut back.

Recommendations

- 3.6 A rolling multi-year schedule for the maintenance of significant rocks should be developed, with the following prescriptions:
 - Shrubs and smaller trees on rocks to be removed and treated to prevent regrowth where necessary (e.g. around Toad Rock). More mature trees growing out of rocks to remain where they are significant features of the rocks
 - Grass growing on cracks in designated rocks to be removed, grass growing on the surface of such rocks to be removed (e.g. Wellington Rocks) or could remain (e.g. opposite the Mount Edgcumbe), depending on the circumstances (in line with advice received from Natural England);
 - Sight lines to be created / maintained to keep views around some rock formations and to enhance the views of rocks. To be achieved by cutting back undergrowth, branches and trees where appropriate;
- 3.7 Some of the above work (involving chemical treatment or machine tools) must be carried out by the Warden or contractors. Some elements can be achieved on a prioritised basis by volunteers.

Prioritisation

3.8 The rock formations on the Commons have been categorised by prominence and status and assigned priorities based on that categorisation, as follows:

- *Prominence: – a measure of how important the rocks are:*
 - High known landmarks of the Commons
 - Medium significant footfall or significant rock formations
 - Low all other rocks
- *Condition: – a measure of how overgrown they are with grass / brambles / scrubs / trees etc. - simplified to a coding of:*
 - Red work required to bring to good condition
 - Green regular maintenance required
- *Priority: - a function of prominence and condition*
Priority rating from 1 (most urgent) to 5 (least important).

3.9 A detailed categorisation of all the rock areas, including maps and photographs, is provided in Appendices A3. 1-x. The proposed categorisation is influenced by whether formations fall into the SSSI. Once agreed, this listing should form the basis for a rolling multi-year work schedule, including volunteer work, for each area.

3.10 The highest priorities for immediate remedial attention are:

- Toad Rock;
- Bishops Rock, Dog’s Head, Fox’s Hole and surrounds;
- Table, Water rock, Elephant and surrounds; and
- Wellington Rocks.

Monitoring and recording the condition of rocks over time

3.11 A photographic audit of the significant rock formations is recommended every 2-3 years and for other formations every 3-5 years to monitor their status and any deterioration in their condition. Photographs of all significant rocks have been made over the summer of 2016, however it is suggested also to photograph them in the winter when there is less vegetation obscuring the rocks.

3.12 Following each audit, the updated condition would be noted on the rock management schedule and maintenance priorities adjusted as required.

Best practice maintenance prescription

3.13 Grass growing in cracks in between rocks should be removed. Grass growing on the surface of rocks may be acceptable. This should be considered on a case by case basis. Grass should be killed through chemical treatment, and can be pulled out at a later date. This approach minimises the risk of damage to surrounding rocks. Natural England suggests: “By applying glyphosate in the active growing season, the grass will wither back to the roots and can then be easily removed. The important thing is to keep an eye on it taking hold.”

3.14 Scrub vegetation growing out of or over rocks should be removed by cutting back and/or chemical treatment. Small trees should be removed. More mature or significant trees growing out of rocks should remain as features of the rocks. Examples of mature trees are given in appendix xx.

	What to do	Frequency and timing	Who
Managing grass growth	Apply chemical treatment. Follow up with removal of dead grass and subsequent weeding by hand	Spring or early summer (active growing season) Frequency based on maintenance schedule: every 2-3 years for high priority rocks, every 3-5 years for other rocks	Chemical treatment by professional contractors. Removal of dead grass by contractors or volunteers. Subsequent hand weeding by volunteers

Scrub – shrubs, brambles, gorse etc	Cut back or chemically spray in the growing season	As for grass	Chemical spraying by professional contractors Could be supplemented by cutting back in autumn by volunteers
Trees	Cut close to the ground and treat immediately with chemicals (within 10 minutes)	As required based on maintenance schedule	Professional contractors

Managing growth around rocks

3.15 To preserve the views around some rock formations and to enhance the views of rocks, it is recommended to create sight lines by cutting back undergrowth, low hanging branches and trees where appropriate.

3.16 The areas around Toad Rock, Bishop’s Head, the Loaf, Ship and Little Toad are good examples where their view and views of and around them are being obscured. The rocks north of Gibraltar Cottage which are visible from the path between Gibraltar Cottage and St Helena is also a good example of rocks which are becoming obscured.

3.17 This type of clearance could be undertaken on a 3-5 year cycle. For less significant rocks, it is suggested to review this on a 7-10 year basis.

Potential rocks projects, subject to funding

3.18 Projects already approved for support by the Friends include a clearance between the Cheesewring rock formation and Nevill Park in Happy Valley on Rusthall Common.

3.19 Projects under consideration for support by the Freehold Tenants include further work near the Cheesewring formation to remove nearby fallen trees and expose rock surfaces.

3.20 Further projects might include clearance at the west end of Bulls Hollow (by the badger’s sett) or clearance around the Ship and Little Toad near Toad Rock on Rusthall Common.

4. Ponds

Summary/background

- 4.1 This section draws on the advice contained in a report prepared by Dr Lee Brady of Calumma Ecological Services dated 10 May 2016. (See Appendix A4.1). The report was based on a survey of native and invasive plants, tree cover and marginal vegetation and a review of amphibian populations and any threats from other wildlife resident in the ponds. Dr Brady was also asked to assess the viability and desirability of creating new ponds.
- 4.2 Including Brighton Lake there are four ponds on Tunbridge Wells Common and five on Rusthall Common. The ponds were used in former times by grazing animals. Many were filled in during the second half of the 19th century. Most of the existing ponds retain their water throughout the year but (two) are seasonal which improves their attractiveness for newts. Several ponds sustain a newt population and there is evidence of Great Crested Newts in the larger Marlpit Pond on Rusthall Common.
- 4.3 The current programme of maintenance for ponds is monitoring and intervention on an as-needed basis. Annual vegetation clearance is undertaken by volunteers (for example on Fir Tree Pond). Major de-silting or equivalent restoration projects are generally funded by donations from the Freehold Tenants.
- 4.4 Dr Brady was pleased with the progress made on managing the ponds since his earlier report of completed for the 2004-05 Management Plan, in conjunction with a colleague from The Kent Wildlife Trust.

Recommendations

- 4.5 It is recommended that an annual audit to monitor the condition of all ponds be conducted. A template for conducting an audit is given in appendix A4.3. The audit report should include photographs, evaluate previous work and list and cost any maintenance requirements. Work types likely to come within such programmed maintenance are clearance of marginal vegetation and overhanging trees, removal of invasive plant species, selective removal or thinning of other plants and clearing blocked ditches and pipes.
- 4.6 On a more frequent basis (quarterly) all the ponds should be checked for rubbish and all litter removed. The edges and drainage ditches should also be checked for damage or silting. Any required actions should be added to the most recent audit report.
- 4.7 In the event of leakage, early remedial action should be taken to restore the integrity on the pond. There is a leak in Bracken Cottage Pond, though it has retained sufficient water for wildlife. It was noted that this required immediate attention and remedial work is planned.
- 4.8 The process of silting up over time is inevitable. It is a matter of judgment when to remove excess silt and how much at one time. As a rule of thumb, it is likely that around one third of the surface area should be subject to desilting at a time. The spoil should be piled adjacent to the pond to allow as much as possible of the wildlife to make its way back to the water. The date of the action should be noted on the most recent audit report for the pond. Scheduled dates for the second and third phases of desilting should also be noted on the audit report.

4.9 There should be regular identification and removal of invasive and alien species. This work may possibly be carried out at the same time as desilting, however these plants should be removed from site immediately.

4.10 When clearance work is carried out in and around the ponds, the opportunity should be taken to provide habitats for reptiles by creating partially-covered log piles in the vicinity (perhaps using the spoil from de-silting): the partial cover will reduce the chances that the reptiles are disturbed.

Potential pond projects, subject to funding

4.11 Two sites have been identified for consideration of potential new ponds in the future. These are located to the north of Romanoff Lodge on Castle Road on Tunbridge Wells Common and north of the cricket pavilion on Rusthall Common. The Rusthall option would offer the best prospect for preserving and spreading the population of Great Crested Newts. The Marlpit pond in which the Great Crested Newts are currently present has invasive Australian Swamp Stonecrop which might eventually threaten other species in the pond. To help preserve the newt population, our expert recommended that consideration be given to siting a new pond within 100 yards to allow the newts to transfer.

4.12 Several of the ponds on the Commons will require de-silting during the course of the Plan, and this is likely to require funding support as in the past.

5. Grassland and wood pasture

Summary/background

- 5.1 The commentary and recommendations in the section are based on a report from Kent High Weald Partnership, dated July 2016. Detailed recommendations for specific areas reviewed are contained in Appendices A5.1-x
- 5.2 The Commons host a number of areas of acid and neutral grassland and wood pasture with varying conditions of diversity and structure. The current programme of maintenance these areas involves annual cutting by flail in August (formerly July), with all arisings removed. Sensitive areas where anthills are present are hand-strimmed and weeded.
- 5.3 An area of xx m² adjacent to London Road on Tunbridge Wells Common has been established as a wildflower meadow. *(Steve to add status comment).*
- 5.4 Acid grassland is typically associated with nutrient-poor and thin, free-draining soils and species richness can vary. Unless fertility increases or scrub encroaches minimal management is usually required. However, many of the acid grassland sites are showing signs of both increased fertility and encroachment, so intervention through management techniques will be required to prevent succession to woodland and scrub.

Recommendations - Grassland

- 5.5 On all grassland sites cutting should continue to be carried out annually (late summer, after seeds have set) with all arisings removed as soon as possible (ideally within a week to avoid nutrient enrichment). For structural diversity it is recommended to leave unmown patches or strips randomly and rotationally, and around the edges of the site *(KHWP will provide detailed advice and examples of this approach to management)*. On acid grassland areas with thin soil heavy machinery can have a damaging effect and so more sensitive management will be required, especially where there are anthills present.
- 5.6 On sites where fertility needs reducing (grass-dominated sites) it is suggested to introduce a spring cut in addition to the late summer cut. All arisings must be removed as soon as possible. *(This will have budget implications so it is initially proposed to restrict spring cuts to a limited number of sites to be proposed by the Warden based on advice from Kent High Weald Partnership.)*
- 5.7 There should not be much need to sow seeds as most of the grassland areas show signs that there is an existing seed bank. Patches of bare ground should be maintained where possible (and existing) as these are valuable to invertebrates, especially on south facing slopes. This is particularly important in the sandpit area near Wellington Rocks as this is a very important site for the specialist mining bee, *Panurgus banksianus* (Ian Beavis, pers. comm. 2016).
- 5.8 Scrub encroachment must be managed where bramble and bracken are becoming dominant in grassland areas. It does not need to be completely eradicated as it has some value and makes up part of the mosaic, particularly in edge habitat. Dominant species such as creeping thistle also require control. The bracken may be best managed by spraying with Asulox. Bracken will diminish with annual cutting. Creeping thistle and tree saplings are best pulled or dug out using specialist tools, such as Lazy Dogs.
- 5.9 Any opportunity to expand areas of acid grassland by cutting into the secondary woodland should be explored as longer term projects.

Recommendations - Wood pasture

5.10 The areas of wood pasture should be managed similarly to grassland with annual and rotational cut and clear. Cutting should be carried out annually (late summer, after seeds have set) and all arisings removed as soon as possible to avoid nutrient enrichment. For structural diversity the cutting should rotationally leave unmown patches or strips around the edges of the site. On sites where fertility needs reducing (grass dominated sites) a spring cut (and cuttings removed) can be carried out in addition to the late summer cut. *(As above, this has budget implications and will be restricted to a few sites proposed by the Warden based on advice from Kent High Weald Partnership).*

5.11 The shade provided by the dense tree canopy in some areas will restrict floristic diversity so it may be favourable to carry out some selective thinning of standards and pollarding, subject to guidance from a veteran tree expert for any trees of value. Any standing or fallen deadwood should be retained (unless it presents a safety issue).

Additional recommendations

5.12 As noted in section 8 below, cherry laurel is a problem that requires addressing on both Commons, including in the areas of wood pasture. Himalayan balsam is also present on both Commons –this can easily be hand pulled by volunteers before the seed has set (and repeated annually as required). Despite having some value to bees, the plant is non-native and will spread rapidly if not controlled.

5.13 Many of the habitats on the Commons are suitable for reptiles and to provide additional resources for these species the creation of well-sited refugia/hibernacula could be considered.

5.14 A regular monitoring programme should be introduced for key areas of grassland and wood pasture, including a photographic audit of key sites (See Appendix A5.x for Rapid Assessment approach and a sample monitoring form). Mapping and monitoring of invasive non-native species should also be carried out annually.

5.15 (Recommendations for wildflower meadow areas? Ask KHWP?)

Potential grassland improvement projects

5.16 Projects under consideration for support by the Freehold Tenants in 2017 include clearing holly to allow more light into the glade near the Bat Cave on Tunbridge Wells Common and extension of the clearing between Romanoff Lodge and Mount Edgumbe.

5.17 Further projects for future consideration might include.

6. Heathland

Summary/background

- 6.1 The commentary and recommendations in the section are based on a report from Kent High Weald Partnership, dated July 2016. Detailed recommendations for specific areas and a sample monitoring form are contained in Appendices A6.1-x
- 6.2 Lowland heathland is a UK priority habitat and is historically a key habitat of the commons. The intentions of the Conservators at the time of the 1992 management plan were to return the Commons as far as possible to the open heathland that existed for centuries, but was lost in the twentieth century as grazing died out.
- 6.3 However, maintaining the heathland on the site has proved to be a challenging task. Traditional methods of management such as grazing are not viable and alternative methods require high levels of manpower and resources. Current management involves *(Steve to complete)* Because of the manpower required, much of the work of the most sensitive sites is undertaken by volunteers.
- 6.4 Over the past 20 years the landscape near Tunbridge Wells has changed with the creation and restoration of heathland areas at Broadwater Warren RSPB reserve and xxx so that restoring the heathland on the Commons has reduced in priority from a regional biodiversity perspective.
- 6.5 It is recommended that, rather than attempt large-scale restoration, future efforts be focused on maintaining the small number of key heathland/heathy grassland areas. The most important site is the one remaining area of relict heath just north of Victoria Grove. This will require greater resources (such as volunteer hours) than are currently applied.

Recommended management

- 6.6 Management by cutting should ideally mimic grazing as closely as possible – so rather than uniform cutting across the site, there should be rotational cutting at differing levels to create a mosaic of structure and heather age. This is best carried out with brush cutters and hand tools to allow for greater control and varying cutting heights. No more than 25% of the heather should be cut at one time and cutting should be done as late as possible (autumn/winter) to allow seed to set. Arisings must eventually be removed, but cuttings may be used to help spread seed to other areas. In the relict heathland area the dominant brambles and bracken should be cleared by hand to avoid cutting the heather.
- 6.7 Scrub must be controlled on heathland sites with bracken accounting for not more than 5% of the site. Spraying of bracken may be necessary and cutting or pulling of other dominant species such as birch and bramble. Again hand tools will be needed to avoid negative impact on heather and other heathland flora.
- 6.8 Patches of bare ground should be maintained.
- 6.9 The key heathland sites should be monitored annually, recording % cover and age categories. (See Appendix A6.1 for a sample heathland monitoring form).
- 6.10 The Kent High Weald Partnership also recommended that the Conservators consider the option of grazing a couple of the key sites, using temporary fencing in contained areas, however they recognised that logistical and risk management challenges were likely to make this unfeasible.

7. Woodland edges, glades and rides

Summary/background

- 7.1 This section is based on a report from Kent High Weald Partnership, dated July 2016. The commentary and recommendations are focused on preserving and increasing habitat diversity. Recommendations for maintaining and preserving the trees on the Commons are given in Section 8 below. Detailed recommendations for specific areas reviewed are contained in Appendices A7-x.
- 7.2 The woodland in the commons is predominantly secondary mixed broadleaf and would not be a national or regional priority habitat compared with heathland or grassland. The most valuable areas from a habitat perspective are the woodland edges, rides and glades. South-facing woodland rides running east-west across the site present the greatest opportunity to increase biodiversity.

Recommendations

- 7.3 *Rides* – main tracks and paths should be zonally managed to provide graduating tiers of vegetation from the ground up to the woodland. These should be cut and coppiced on rotational basis with rotationally scalloped sections, focussing on south facing rides in particular. East-west rides should take priority over north-south as these provide the greatest value for wildlife. Guidance on zonal management and scalloping can be found in The English Woodland Grant Scheme Operations Note 11.
- 7.4 *Glades* – Open spaces and glades should be maintained throughout the woodlands with rotational cut and clear.
- 7.5 *Thinning/Coppicing* – any opportunities to carry out coppicing or to thin dense areas of woodland should be explored as these can enhance the biodiversity value of the woods. (*Kent High Weald Partnership will provide more detailed recommendations*)
- 7.6 *Deadwood* – standing and fallen deadwood are a key element of the woodland habitat mosaic and should be encouraged.

Edge Habitats

- 7.7 Most of the habitat sites reviewed adjoin other habitats and the edge habitats that interface between them are just as valuable (often more so) for biodiversity. Management of these areas should therefore be incorporated into the habitat management to promote structural diversity. (*KHWP will provide detailed examples and guidance*).
- 7.8 Management should promote a graduating structure from grassland or heathland to woodland/scrub by taking edges out of the annual mowing regime and cutting sections less frequently. Edges should be scallop cut on a rotational basis, particularly where they are south facing. There should be rotational coppicing of trees and scrub.

Coralroot bittercress

- 7.9 Coralroot bittercress (*Cardamine bulbifera*) is known to be present on two sites, one in Tunbridge Wells Common and one in Rusthall Common. The plants should be surveyed during the spring flowering season and mapped with GPS co-ordinates. It should then be monitored every one- to two years. Coralroot bittercress likes damp woodland and, other than monitoring, management is effectively to maintain favourable conditions – low light levels and damp ground.

Monitoring

7.10 While it would not be practicable to monitor all the woodland edges and glades, there should be annual monitoring with photographic records of selected priority sites and areas where recent clearance work has been carried out.

Potential woodland edge projects, subject to funding

7.11 Scalping work has been commissioned on the east-west section of the old racecourse on Tunbridge Wells Common between Hungershall Park and Major Yorks Road. This is supported by Section 106 funding.

7.12 Further projects might include additional scalping of sections of the racecourse and ...

8. Trees and Woodland

Summary/background

- 8.1 Our review of trees drew on the input from two experts from the “Living Forest” offered during a walk over Tunbridge Wells Common 24 August 2016. Their opinions and recommendations are summarised below.
- 8.2 While the woodland on the Commons is not a priority habitat from a national or regional perspective, it is very important to the amenity value of the Commons as well as for our wildlife. From a local perspective, it is a priority to preserve and increase the stock of veteran and specimen trees and encourage diversity of native species.
- 8.3 To assist the process of documenting a plan for trees and woodland a survey was conducted by the Freehold Tenants during summer 2016. The output from that survey is illustrated on six plans (two covering Rusthall Common and four covering Tunbridge Wells Common). Using a numeric reference the trees are identified on the accompanying spreadsheet. (See appendices A8. 4-11)
- 8.4 The trees on the Commons are a mix of self-seeded, boundary trees (typically oak) and commemorative plantings which lacked the benefit of a Lancelot “Capability” Brown or Humphrey Repton, working with a blank canvas to bring visual harmony to the apparent randomness visible today.
- 8.5 Most of the current management of trees is based on the need to ensure the safety the public walking, horse riders and drivers on roads across over the commons through a programme of preventative felling and branch removal; and to keep roadsides, paths and tracks clear by removal of felled or fallen trees and branches. There has also been selective thinning and crown-lifting for visual effect, to allow light onto paths to help them dry out, or on public safety grounds (near MYR footpath). Epicormic growth on the limes in Victoria Grove and along Eridge Road is removed annually.

Recommendations

- 8.6 The planning timescale for the management of trees must encompass a vision covering at least 25 years. Within that overall vision there should be a detailed plan of activities covering a period of one to five years, including provision for maintenance of recently planted trees and work identified through an annual survey of priority trees.

Annual tree survey

- 8.7 The purpose of the annual tree survey is to identify any issues requiring tree work before they pose a threat either to the tree itself or to users of the common. (Note: this survey would be conducted by the Warden and is a separate activity from the professional arborists’ survey of roadside trees for insurance/liability purposes).
- 8.8 A prioritised assessment of the trees on both Commons should be made to determine the frequency that each area should be surveyed and the importance of any work required. Trees will be categorised using a Red/Amber/Green scheme according to their location and remedial action required (similar to the approach recommended for rock formations in Section 3). So, for example:
 - Specimen or veteran trees should be inspected annually.
 - Trees adjacent to the main paths and roads across the Commons should be inspected annually.

- Trees within woodland dissected by minor pathways may require inspection every two or three years.
- All other trees may be monitored on an ad hoc basis as users of the Commons may, from time to time, report.

Maintenance regime

8.9 In addition to work identified by the annual tree surveys, there should be a regular “good housekeeping” maintenance regime. Harking back to the planning of “Capability” Brown at Petworth Park, keeping deer to browse the base of the tree canopy allows walkers and horse riders to pass safely under the branches. (This would clearly not be feasible/desirable on the Commons at the scale required). The Forestry Commission recommends that trees near to paths and rides should have a fixed clearance beneath the canopy. Similarly, any woodland edges coming within a “scalloping” regime should comply to a regular pruning schedule (see section 7). As suggested below, rare or veteran trees should be the subject of specific care programs.

8.10 Clearance of invasive species and planned felling should be accompanied by appropriate disposal of the timber and brush wood, being mindful of fire risk. It is recommended that some timber stacks be retained to help insects and invertebrates but that brush wood should be burnt or shredded and stumps ground out.

Specimen and veteran trees

8.11 There are several trees on both Commons that should be categorised as specimen or veteran and receive additional management protection. Examples of each are identified in Appendices A8.4-11. There are two small leaved limes, a single elm, a holm oak as well as mature beeches, hornbeams, oaks, pines, cherries, chestnuts, poplars, field maples and lime trees that should be monitored annually. Any maintenance work should be the subject of professional advice to avoid “shock” to the trees. Trimming dead branches should not necessarily be taken back to the trunk. It is recommended that ivy and nearby saplings should be cut back around these trees.

8.12 New tree plantings should be planned and undertaken within the proposed 25-year vision. After planting the supporting stakes and ties should be removed when the trees become established or to avoid damage. The newly planted trees should be pruned at appropriate intervals in the first ten years after planting to ensure that well-balanced mature trees result.

Invasive and Non-Native Species

8.13 As noted by Kent High Weald Partnership, cherry laurel is present in many of the woodland areas, especially on Rusthall Common. Cherry laurel will spread and outcompete all other ground and sub-canopy woodland species if not controlled. It is recommended that a rolling plan be prepared to eradicate the cherry laurel as far as possible, starting with the most sensitive sites (near Victoria Grove or close to specimen trees) and areas where infestation is greatest. Small plants should be pulled and removed and larger specimens cut and treated with herbicide. Regrowth should also be sprayed. Arisings should be removed, stacked or burned.

8.14 There are several other invasive species on both commons. These include rhododendron, holly, sycamore and silver birch saplings. The location and frequency of these species should be identified and a costed program of control and, where necessary, eradication devised. It is recommended to select priority areas to cut and remove the saplings over winter with a chemical spray to any regrowth the following spring.

Potential tree projects, subject to funding

8.15 Potential improvement projects under consideration for funding by the Freehold Tenants in 2017 include:

- Clear areas around specimen trees, following expert guidance. Early examples might include the Queen Anne Oak and the Holm Oak near Cabbage Stalk Lane.
- Test clearances of scrub/saplings, holly and cherry laurel in sensitive sites.

8.16 Additional projects over the course of the plan period might include

9. Public Amenity – paths, grass mowing, ditches, seats and litter bins

Summary/background

- 9.1 Although the primary goals of the Conservators are related to habitat and biodiversity, most of the work undertaken on the Commons is to maintain and improve public access and the public amenity value of the Commons. This includes:
- Mowing certain areas for sport and leisure use (see maps in Appendices A9/)
 - Mowing/flailing road and footpath verges and certain tracks (see Appendices)
 - Maintaining surfaced paths (some surfaced paths are the responsibility of KCC)
 - Maintaining drainage ditches adjacent to paths and tracks
 - Creation of new paths and tracks and improvement of existing paths and tracks.
 - Creation of new sightlines and vistas.
 - Provision of seats and litter bins and regular collection of litter.
- 9.2 Some of these activities, such as flail mowing open areas, tracks and rides, also have a direct habitat value. All work is carried out with the Conservators' biodiversity goals in mind (for example, the annual cut of open areas is scheduled in late summer and tree work in winter).
- 9.3 Regular maintenance activities are funded by the annual precept, while most improvement projects have been initiated and funded by the Freehold Tenants, the Friends and individual donations. An additional recent source of funding has been Section 106 mitigation payments associated with new construction near the Commons.
- 9.4 Contracts for regular grass-cutting and litter collection are due to expire and the Conservators wish to ensure that the work specification for new contracts commencing in 2017 and 2018 respectively are consistent with the recommendations of the Management Plan.

Recommendations

- 9.5 All work on the Commons should be consistent with the habitat and biodiversity principles in the Management Plan. Work descriptions should continue to be drawn up for Conservators' approval with this objective in mind.
- 9.6 For each improvement project, longer term maintenance (and risk) implications should be assessed and quantified before its submission to the Conservators for approval. Standard specification criteria should be applied that will minimise future maintenance costs (for example Gripclad for steps).
- 9.7 Immediate priorities and longer-term aspirations for enhancing public amenity should be agreed by the Conservators and a register should be maintained of the highest improvement priorities for implementation as (windfall) funding becomes available. This should be reviewed and updated annually.

Mowing and flail contracts

- 9.8 The specifications for new contracts for mowing and flail work on the Commons will need to take into consideration:
- Whether changes are required to areas for amenity mowing and, if so, whether any increase can be offset elsewhere;
 - Whether the number of amenity cuts per year is sufficient and, if more are needed in some areas, whether there is scope to offset this by reducing frequency elsewhere;

- Areas to be included in the regular flail cutting regime, including recent clearances and areas where there are public safety concerns near roadsides or paths (see section 10);
- Relative costs and benefits of multi-year contracts versus annual contracts or piecework for annual (or more frequent) flail work;
- Proposed grassland areas requiring an additional Spring cut to reduce fertility, with associated costs;
- Feasibility, costs and benefits of increasing specified width of cut for certain path verges from 1 metre to 1.5 or 2 metres;
- Impact of recommendations for varying the mowing regime as recommended by Kent High Weald Partnership; (examples supplied by Kent High Weald Partnership to be included in specification documents)
- Impact of flail machinery on ditches and drainage, with appropriate remediation measures;
- Desired timing for the flail cutting (including consideration of bringing forward the annual cut of some heavily used grassland with relatively low floristic value or early-flowering species to July (before the holidays) rather than mid-August.

Litter contract

9.9 The specification for the new litter contract will need to take into consideration:

- The impact on time requirement of additional litter bins funded by the Section 106 payment for the former hospital site;
- Whether there is any case for installing additional litter bins within the contract period;
- Whether any changes should be made to frequency of litter-picking at key sites. This will be facilitated if there is information on the number of bags of rubbish collected over time;
- Method and cost of disposal of rubbish bags.

Surfaced paths

9.10 It is recommended to inspect all surfaced paths annually as part of the broader monitoring regime, and maintain a prioritised schedule of maintenance/restoration requirements. Regular communication to KCC regarding the state of paths which fall within their responsibility,

Ditches

9.11 All ditches should be inspected annually and a rolling programme of re-digging implemented. Some of the ditches and culverts on the Commons are currently in need of re-digging. Advice should be sought on whether adding traps at culverts would reduce silting and blockage.

9.12 It is recommended to assess the impact of use of flail and mowing machinery on ditches and consider whether there should be a regular scheduled ditch clearance programme following flail work in that area.

Potential projects, subject to funding

9.13 Where funds allow, further footpaths could be created or upgraded on many sites in both Commons. Potential early improvement projects include:

- Raise and upgrade the surfaced path at St Pauls on Rusthall Common to improve drainage.
- Extension of footpath from Common View to the Marlpit Pond on Rusthall Common
- Improvements to new path from Tarry Path to Rusthall Road
- Replacement and/or resurfacing of steps on both Commons (Fir Tree Pond, 39 steps).
- (Add further project suggestions?)

9.14 Some of these are under consideration for funding by the Freehold Tenants in 2017, others may be considered in future years. Other longer-term projects for consideration, subject to funding, might include extension of the all-ability access network with a path from St Pauls to Happy Valley on Rusthall Common

9.15 Priorities for future seat locations?

9.16 Information provision regarding features and habitat on the Commons, for example:

- Ponds are attractive sites and offer an opportunity to view wildlife, consideration should be given to providing “information packs” on the Conservators’ web site and to scheduling regular accompanied walks to see specific pond species – for example nocturnal newt spotting.
- Habitat information – updates on flora and fauna and how to identify them
-

10. Dealing with problems – litter, encroachment, danger to the public

Summary/background

10.1 A growing share of the Conservators' resources is spent preventing, responding to and mitigating problems arising on the Commons. These include:

- Installing and replacing posts and other barriers to prevent verge damage, parking, fly tipping, travellers' camps and other encroachments and to make good damage caused.
- Continuing requirement for work on roadside trees and to maintain sightlines.
- Demand for additional tree and scrub clearance near major paths for public safety reasons.
- Insurance, legal and related charges

10.2 Over the life of the plan these costs are likely to increase further, constraining the resources available for habitat enhancement and public amenity.

10.3 Prevention and pro-active management is most effective approach to managing these new risks. The new Risk Register introduced by the Conservators should facilitate this.

Recommendations

10.4 Keep policies and response plans updated to minimise Warden and Administrator time in responding to issues. The Risk register should facilitate this.

10.5 Apply standard specifications for installations (posts etc) that minimise subsequent maintenance/maximise their life expectancy. Investigate costs/benefits of anti-rot treatment, also whether bunds and ditches might be more cost-effective than posts in certain areas.

10.6 Engage the public.

11. Summary of maintenance recommendations (to complete)

11.1 This section of the final report will bring together key management and maintenance recommendations from all the earlier sections, once agreed.

12. Summary of monitoring recommendations (to complete)

Summary/background

12.1 One of the key recommendations from our expert advisors was to introduce a regular monitoring regime for key sites, features and species:

- It is recommended to survey rocks every 2-5 years.
- An annual pond audit is recommended, supplemented by a less detailed quarterly survey.
- It is recommended that key habitat sites are monitored annually or every two years to assess the impact of management. It would be impractical to monitor all areas so key sites should be identified, including new clearances and sites undergoing dominant species control.
- An annual tree survey is recommended.
- An annual survey of invasive non-native species is recommended, as is a survey of the remaining coralroot bittercress.
- A regular biodiversity survey is recommended. There are species of butterflies and reptiles, for example, which would be good indicators of favourable conditions.
- Paths and ditches would also benefit from an annual survey to assess maintenance requirements.

12.2 Some monitoring might be conducted by the Warden, some by volunteers and some requires experts. Our experts made detailed suggestions on monitoring techniques, including fixed point photography, and sample survey forms. A baseline photographic database has also been compiled.

12.3 This section of the final report will summarise all the monitoring recommendations, including recommended techniques, frequency and who might carry out the surveys.

13. Summary of project recommendations

Summary/background

- 13.1 This section of the final report will summarise all the project recommendations, including those from consultation on the draft plan.

14. Sources of support – volunteers, funding opportunities, expert bodies

Summary/background

14.1 This section of the final report will summarise all recommendations received for potential sources of further funding and support. These include volunteers – Kent High Weald Partnership suggested that we contact Hadlow College and other nearby colleges offering degrees in environment-related subjects, whose students might welcome work experience on the Commons.

15. Appendices, references and further information

These will be attached/linked to the final report.

Appendices

A1.1 Expert advisors

A2.1 Link to 1992 Management Plan

A2.2 Link to 2005 Management Plan

A3.1 Detailed Rocks Report including Categorisation of Rocks

A3.2 Examples of vegetation growth on rocks

A3.3 Maps of Rocks and SSSI

A4.1 Ponds Review Terms of Reference

A4.2 Ponds Report Dr L Brady

A4.3 Ponds Audit Template

A5.1 Habitat Report Kent High Weald Trust

A5.2 Habitat Survey – key grassland and wood pasture site notes and maps

A5.3 Habitat Survey Rapid Assessment and Neutral Grassland Monitoring Form

A5.4 (Acid grassland monitoring form to be commissioned from KHWP)

A6.1 Key heathland site notes and maps

A6.2 Heathland monitoring form

A7.1 Link to EWGS Rides Management

[http://www.forestry.gov.uk/pdf/ewgs-on011-ride-mangt.pdf/\\$FILE/ewgs-on011-ride-mangt.pdf](http://www.forestry.gov.uk/pdf/ewgs-on011-ride-mangt.pdf/$FILE/ewgs-on011-ride-mangt.pdf)

A7.2 Maps of key sites for monitoring and maintenance/improvement

A8.1 Link to Veteran Tree Management Guide:

<http://ancienttreeforum.co.uk/wp-content/uploads/2015/03/Veteran-Trees-A-Guide-to-Good-Management-almost-complete.pdf>

A8.2 Link to EWGS Rides Management (as above)

A8.3 Tree Schedule

A8.4 Tree Plan Rusthall Common C1, C2, C3 & C4

A8.5 Tree Plan Rusthall Common C4, C5 & C6

A8.6 Tree Plan TW Common C1, C2, C3 and C4

A8.7 Tree Plan TW Common C5

A8.8 Tree Plan TW Common C6

A8.9 Tree Plan TW Common C7

A8.10 Tree Plan TW Common C8 & C9

A9.1 Footpath maps and mowing/flail prescriptions

A9.2 Ditch maps

A9.3