

Tunbridge Wells - Landscape and Visual Impact Assessment of Proposed Allocation Sites within the High Weald AONB



6.9: Lamberhurst

Revision B

6.9 Lamberhurst

Lamberhurst site considered:

LA 2 - Misty Meadow, Furnace Lane

See Figure L1 for site locations. The High Weald AONB is shown as a green wash.

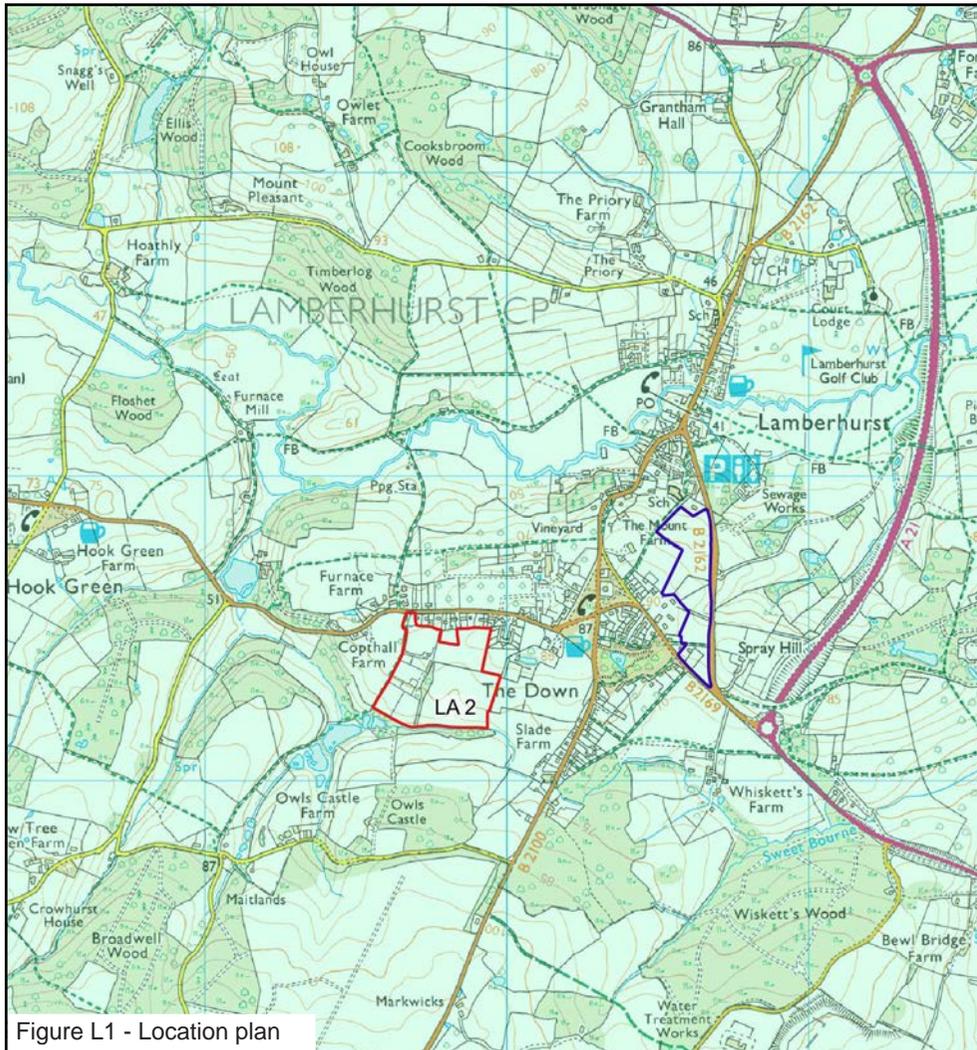


Figure L1 - Location plan

6.9.1 Settlement Context

6.9.1.1 Lamberhurst is a village and civil parish located approximately 8km to the south-east of Royal Tunbridge Wells and approximately 4km to the north-east of Wadhurst. Bewl Water, a large reservoir, lies approximately 1.8km to the south of the village. The A21 bypasses the village to the east, but connects to minor roads at the north and south of the village. The Down (also referred to as Lamberhurst Down) is a hamlet located approximately 200m to the south of the main village at its nearest point. A further hamlet, Hook Green is located within the parish, approximately 1km to the west of the western edge of The Down.

6.9.1.2 The village and associated hamlets are set within a typical High Weald landscape of high ground intersected with watercourses set within steep-sided valleys. Lamberhurst village is a linear settlement centred on the River Teise, a key landmark in the parish. The majority of the village is located within the valley and on the valley side slopes to either side of the river.

6.9.1.3 In contrast, The Down is located on a knoll of high ground and is centred on the crossroads of the B2100 (which runs north-south) and the B2169 (which runs east-west). The crossroads themselves run through an area of common land, which gives the hamlet a distinctive dispersed settlement pattern, particularly in the centre. Ribbon development extends west and south from the centre of the hamlet, along Furnace Lane (B2169) and the B2100 respectively. The high ground on which the hamlet is situated is contained to the north, west and south by watercourses within steep-sided valleys.

6.9.1.4 Hook Green is located on high ground to the west of The Down. The two hamlets are separated by a watercourse and associated valley feature. A large pond is located at the base of the valley, which is associated with Peppermills Lodge. Hook Green itself is a dispersed settlement centred on a collection of farmsteads.

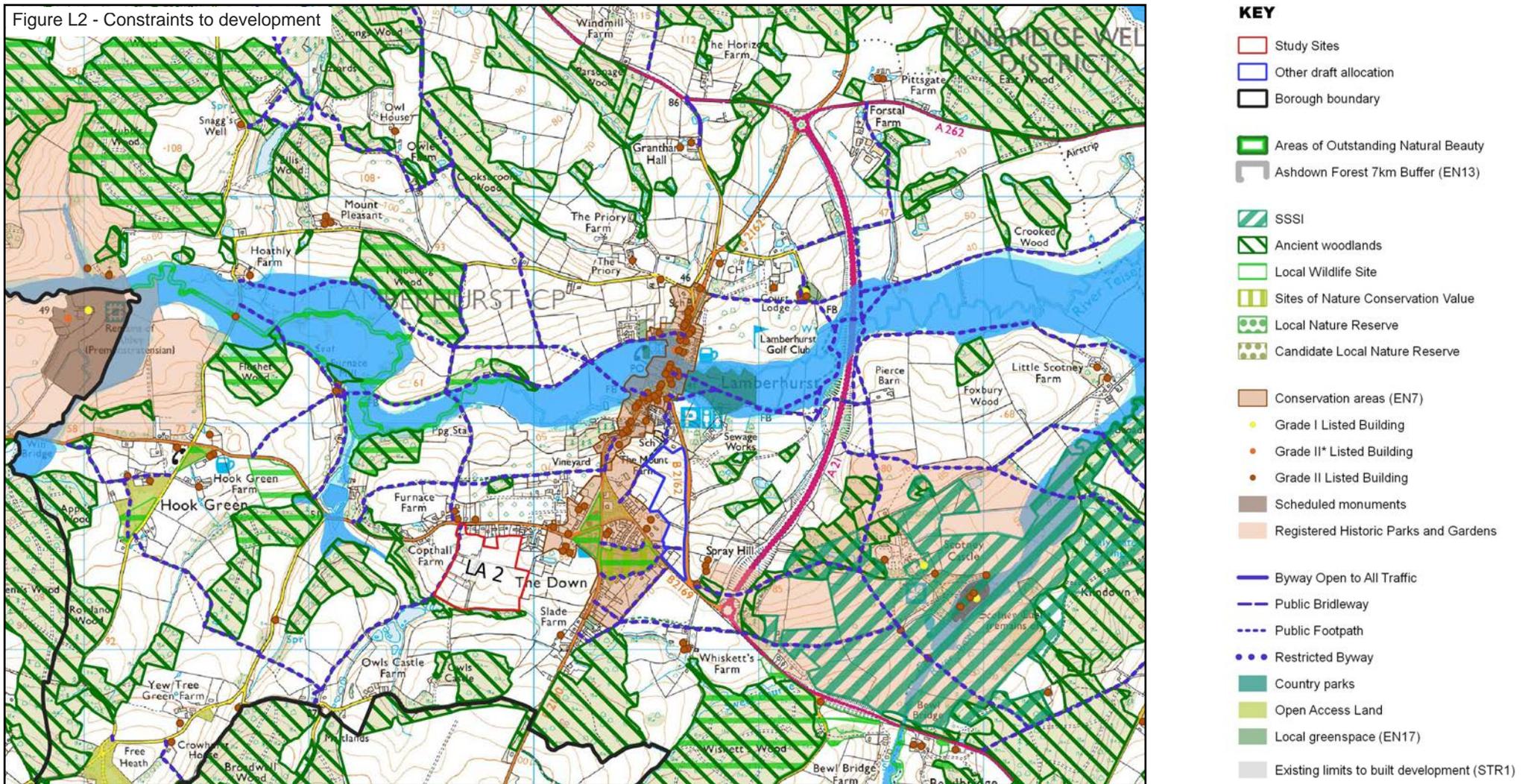
6.9.1.5 The whole parish lies within the High Weald AONB and the settlements have strong historic associations. The centres of both Lamberhurst village and The Down are designated Conservation Areas. The two Conservation Areas join along the B2100. There are numerous listed buildings, both located within the settlement and in the surrounding rural landscape. There are two registered parks and gardens within the study area. One is associated with Scotney Castle, to the east of Lamberhurst and the other is associated with Bayham Abbey, located to the north-west of Hook Green.

6.9.1.6 A large part of the Scotney Castle site is designated as a SSSI. The large open grassland of The Down and the adjacent wooded landscape of The Gravel Pit, are both designated as wildlife sites and are designated as open access land and Local greenspace. The rural landscape surrounding the settlements contains numerous

woodland copses, the majority of which are designated Ancient Woodland.

6.9.1.7 Other constraints to development within the study area include the floodplains associated with local watercourses, most notably the River Teise. The study area is well served by public rights of way.

6.9.1.8 The parish has a draft Neighbourhood Plan, published for consultation in July 2019. The package of documents prepared in support of the Neighbourhood Plan includes a Parish Character Assessment and a document setting out an assessment of locally important views for the parish.



6.9.2 Settlement Evolution

6.9.2.1 Lamberhurst is a historic settlement which developed along an iron-age trackway that crosses the River Teise. Site LA2 is associated with the hamlet of The Down, which has a historic core to the east of the site. Figures L3 and L4 illustrate how ribbon development has gradually increased along Furnace Lane, located to the north of the site and that infill development has occurred at the centre of the hamlet. The field pattern within the site has been relatively consistent over the last 100 years, however the farm and associated outbuildings have been introduced within the centre of the site within the last 50 years.

Figure L3 - OS Map 1897-1900

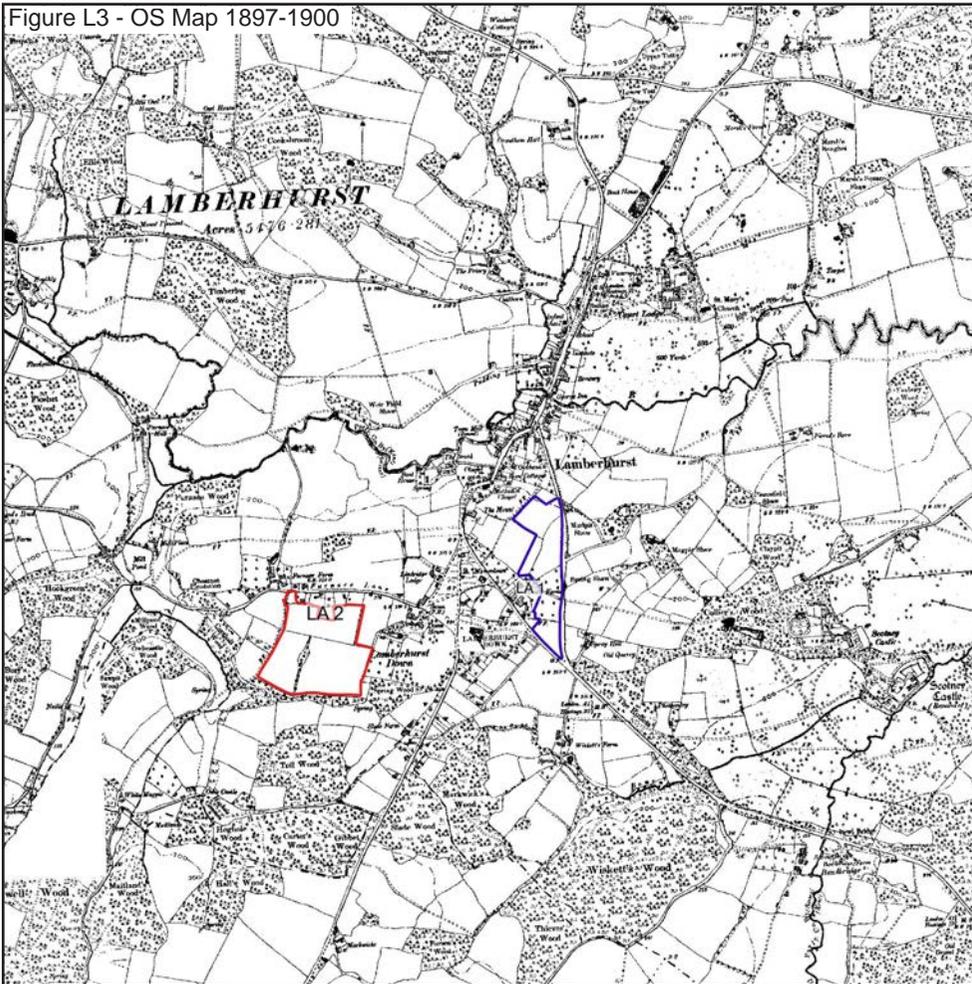
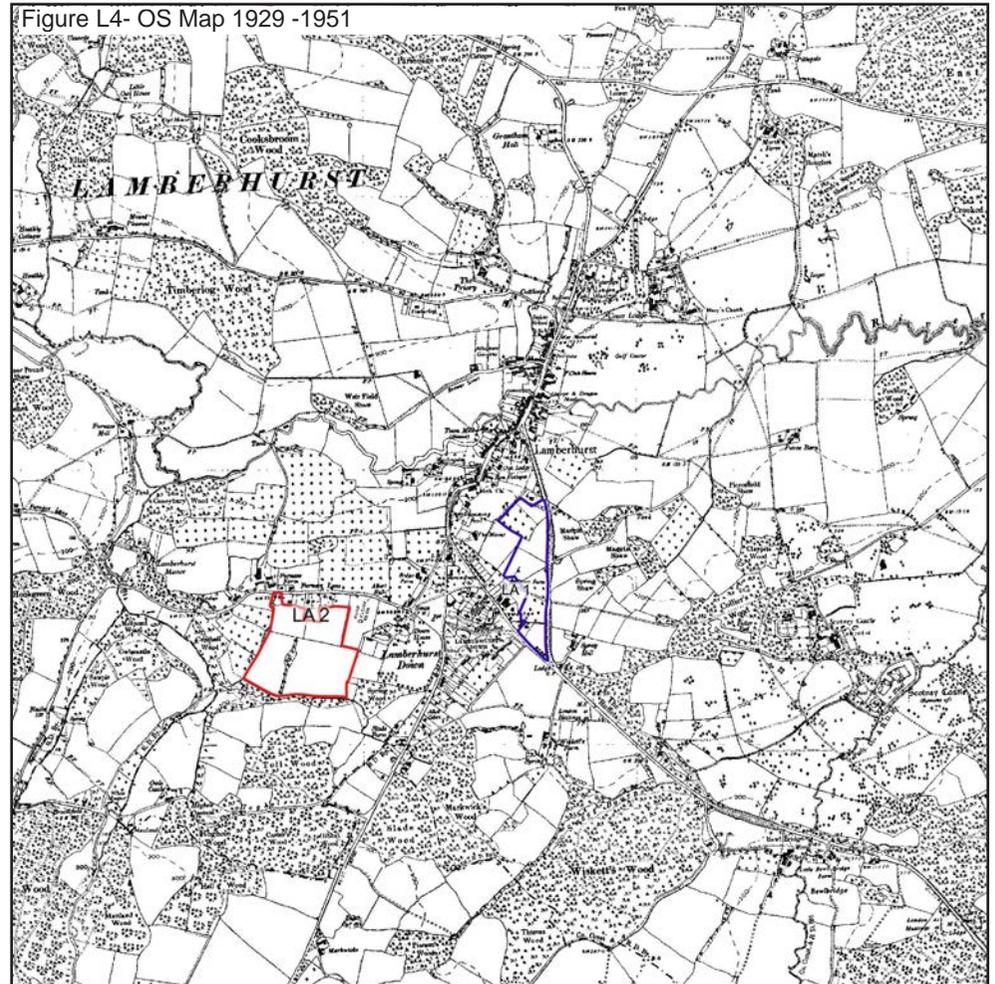


Figure L4- OS Map 1929 -1951



6.9.3 Historic Landscape Character

6.9.3.1 The Kent Historic Landscape Characterisation was updated for Tunbridge Wells Borough in 2017. Extracts from the study, relevant to the Lamberhurst allocation site, are shown on the table opposite.

6.9.3.2 This data has been used to gauge the historic context of the landscape within the study area, which has then been tested through field work in order to analyse which elements are reflected in the current landscape setting.

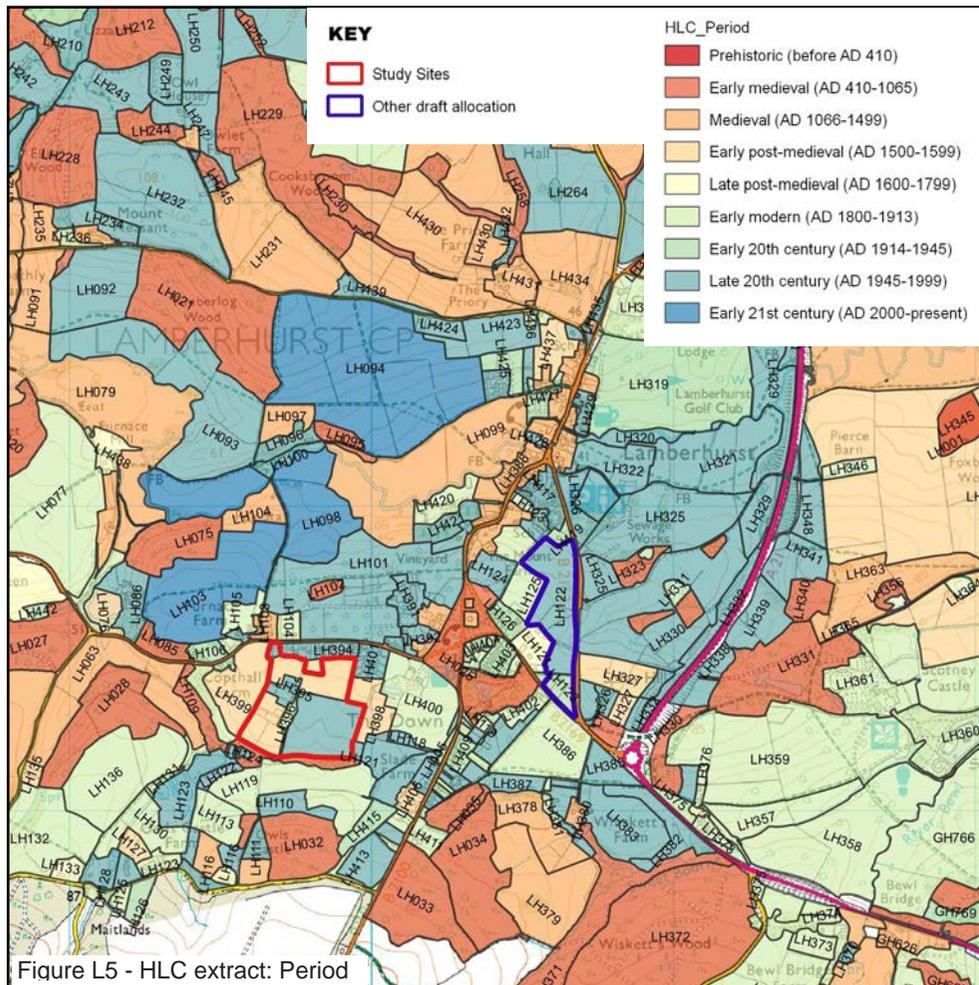


Figure L5 - HLC extract: Period

Site	HLC ID	Type	Period	Additional information
LA2	LH118	Woodpasture	Late 20th century	Small regular fields with straight boundaries
	LH121	Modern field amalgamation	Late 20th century	Small regular fields with straight boundaries
	LH394	Ribbon settlement	Late 20th century	Post-1801 scattered settlement
	LH395	Large farmstead	Late 20th century	Post-1801 scattered settlement
	LH396	Shaws	Early modern	Small regular fields with straight boundaries
	LH398	Formal planned fields	Early post-medieval	Small regular fields with straight boundaries
	LH399	Formal planned fields	Early post-medieval	Post 1801 scattered settlement

6.9.4 Landscape Character

6.9.4.1 The Lamberhurst study site is located within the 'Wooded Farmland' Character Type, which is described as:

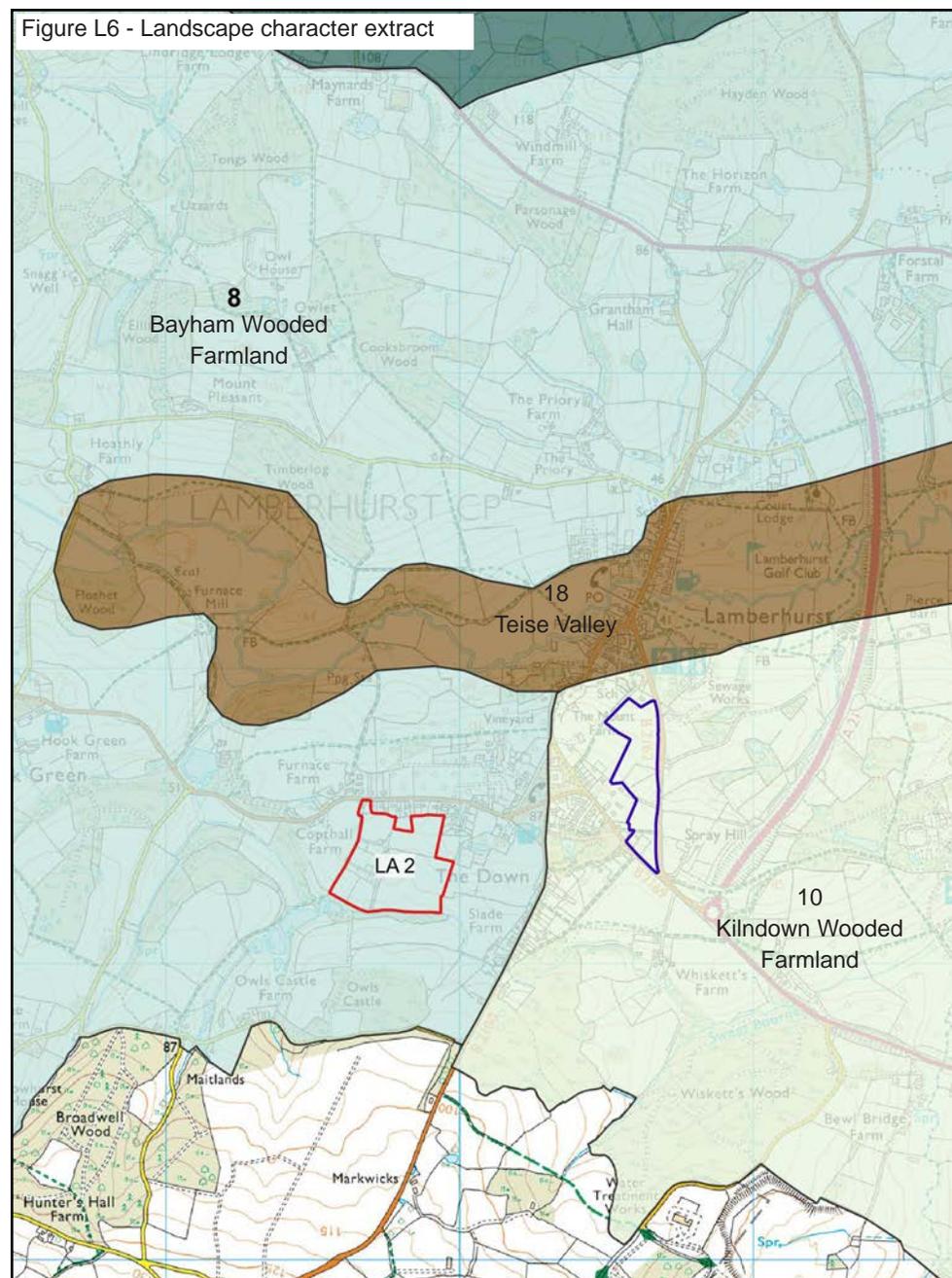
'Extremely varied and complex landscape. Distinct, high ridges with weathered sandstone outcrops intersected by ravine woodland, beech and holly hedges and sunken lanes. These contrast with unimproved pasture and common land. Other characteristics include rolling upland areas, incised by valleys, with small settlements and pastures hidden within a framework of deciduous, ghyll and shaw woodlands.'

6.9.4.2 The landscape character type has been broken down into Landscape Character Areas and the sites lie within Character Area 'Bayham Wooded Farmland'.

Key characteristics of the Character Area include:

- 1) *'Part of the rolling upland plateau of the High Weald, incised by tributaries of the Teise.'*
- 2) *A traditional pattern of land uses with large blocks of deciduous woodland interlinked by thick shaws and narrow ghyll woodlands surrounding sheep grazed pastures and vineyards, although arable land is now increasingly common.*
- 3) *Bayham Abbey, both house and ruins, is a distinctive feature with one of Repton's finest surviving landscapes.*
- 4) *A sparse network of secretive green lanes, overhung by thick woodland hedges. Holly and beech hedges along sunken sandy lanes are a locally distinctive feature.*
- 5) *A dispersed settlement pattern of isolated historic farmsteads, rural dwellings and converted oasts.*
- 6) *Extensive woodland cover, comprising broad swathes of ancient woodland in ghylls, and on hillsides linked by thin strips of shaw woodland. Small copse woodlands are an important feature within the valley west of Lamberhurst.*
- 7) *A sense of rural 'remoteness' and tranquility, with relatively dark skies across much of the area, particularly the south and west.*
- 8) *Commons at Hook Green, Free Heath and The Down, Lamberhurst.'*

6.9.4.3 Appendix 4 of the LCA includes a list of consultee comments on 'Values and Cultural Associations', which lists Bayham Abbey as a locally valued landscape feature. Valued features and qualities noted for the character area within the main assessment document include: Attractive views, strong natural character, sense of tranquillity and historic remnants of former industries.



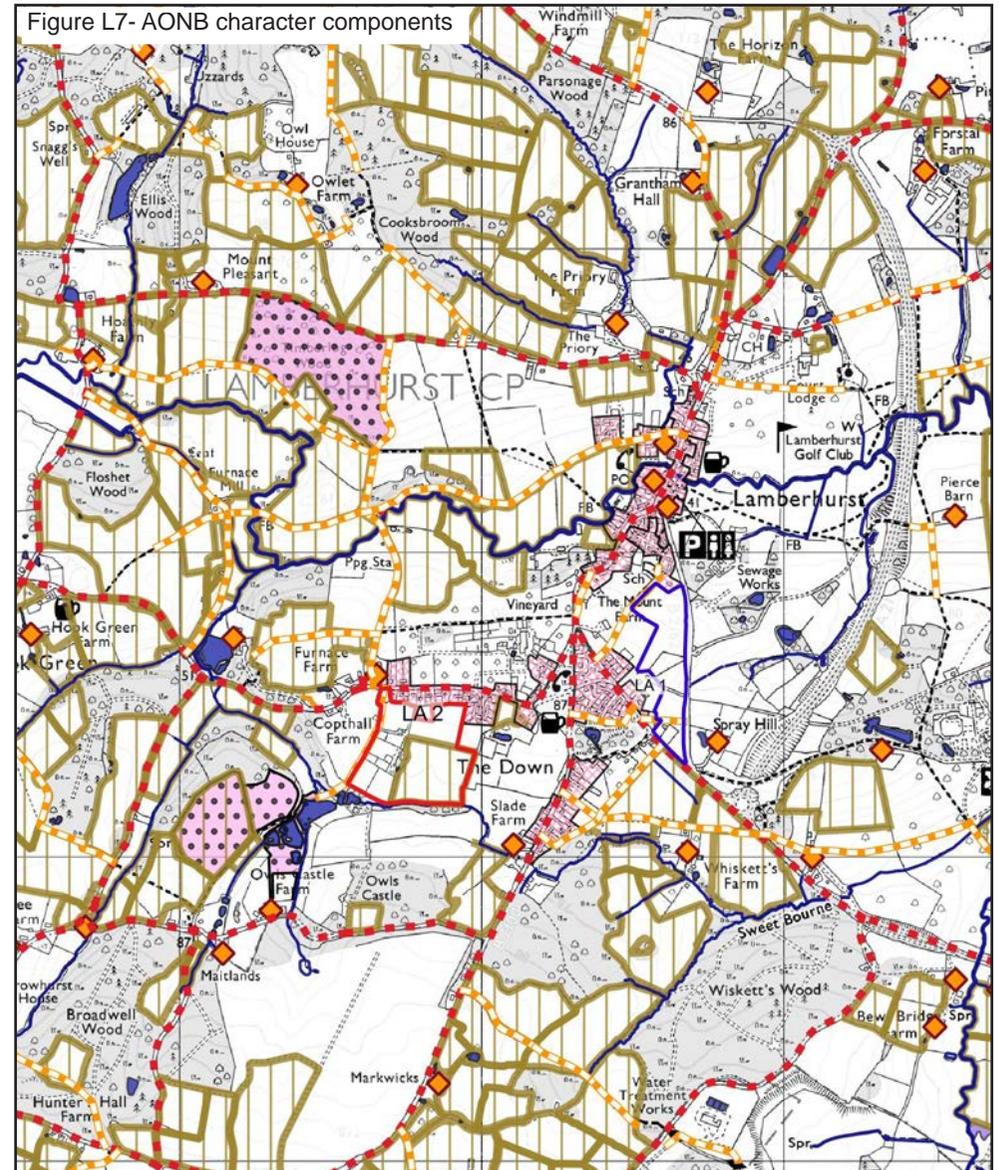
6.9.5 AONB Landscape Character Plans

6.9.5.1 The High Weald AONB Management Plan contains a 'Statement of Significance' which defines the qualities that make the High Weald special at a national level. This statement sets out 5 key 'character components' that contribute to the unique natural beauty of the area and make the High Weald distinctive. For each of these components the High Weald Management Plan lists out key characteristics, issues and objectives. This information has been used within this report to analyse the potential effects of development on the High Weald AONB.

6.9.5.2 The five defining components of character defined for the High Weald include:

1. Geology, landform and water systems – a deeply incised, ridged and faulted landform of clays and sandstone with numerous gill streams.
2. Settlement – dispersed historic settlement including high densities of isolated farmsteads and late Medieval villages founded on trade and non-agricultural rural industries.
3. Routeways – a dense network of historic routeways (now roads, tracks and paths).
4. Woodland – abundance of Ancient Woodland, highly interconnected and in smallholdings.
5. Field and Heath – small, irregular and productive fields, bounded by hedgerows and woods, and typically used for livestock grazing; with distinctive zones of lowland heaths, and inned river valleys.

6.9.5.3 The characteristic components for this study area have been mapped within figure L6. The Ancient woodland has not been included as this information is has been identified on figure L2 and discussed within section 6.9.1.



KEY

Study sites

Other draft allocation

High Weald AONB boundary

Geology, landform, water systems & climate

Water - ponds, reservoir, etc (G1)

Watercourses (G1)

Sandstone outcrops (G2)

Historic routeways

PROW (R1)

Roads (R1)

Field and heath

Historic field boundary

Heathland

Known wildflower meadows

Settlement

◆ Historic farmsteads (S2)

Historic settlement extent c.1860 (S2)

Site : LA 2 - Misty Meadow, Furnace Lane;

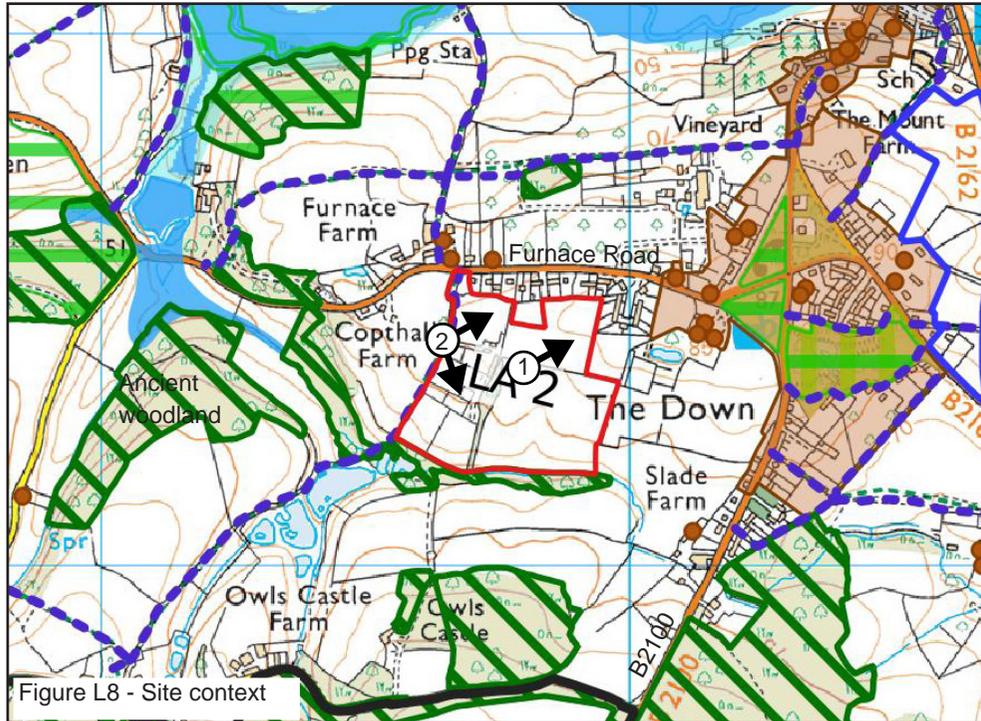


Figure L8 - Site context

Site location and context:

The site is located on the edge of settlement, to the south-west of The Down and south of the B2169 Furnace Road. A line of low density ribbon development runs along the southern edge of Furnace Road, and sits between the site and the road. The village of Lamberhurst lies to the north-east.

The site consists of a farmhouse with associated stables and barn surrounded by four small fields in pasture. The fields are currently subdivided into paddocks, grazed by horses. A ménage is located to the south of the farm complex. The two northern fields are smaller in size and are located on the flat ground of the plateau. The farmstead is located to the south-east of the north-western field. The two southern fields are larger and are located on a south-facing slope. These fields are separated by a north-south tree belt. A woodland lies adjacent to the southern boundary and a stream runs through east-west through the centre of the woodland.

Designations and development considerations:

The site lies within the AONB and the woodland to the south of the site is designated Ancient Woodland. There are listed buildings to the north-west opposite the site entrance. The Down Conservation Area is located to the north-east and east. A footpath runs alongside the western site boundary. Locally valued features and qualities which have the potential to be affected by development within the site include: attractive views from the high ground of the footpath, and the rural character of the countryside, particularly to the south of the site.



Photograph 1: View north-east across the north-eastern field of the site.



Photograph 2: Looking north-east from the footpath to the west of the site.



Photograph 2 (continued): Looking south-east from the footpath to the west of the site.

<p>Landscape baseline and key features</p>	<p>Visual baseline and key viewpoints</p>	<p>Perceptual and experiential qualities</p>	<p>Representativeness of AONB Qualities (with reference to the relevant character components and objectives of the High Weald AONB Management Plan)</p>
<p>The site is relatively typical of the ‘Bayham Wooded Farmland’. It consists of small fields in pasture on a sloping topography, which are contained by blocks of woodland. Adjacent settlement is low density and is limited in extent. There are few locations where settlement is more than one dwelling deep.</p> <p>The two northern fields have a stronger relationship to the settlement edge, with housing to the north and the farmstead to the south-west. The fields are relatively contained from the wider landscape. The north-western field is further enclosed by two Leylandii hedges. These are an atypical feature within the landscape but are intact have some value in terms of screening.</p> <p>The two southern fields have a rural character and a strong association with the wider landscape. These fields have an intrinsic landscape value and contribution to the character and scenic beauty AONB.</p> <p>Key landscape features within the site (ordered from higher to lower sensitivity) include:</p> <ul style="list-style-type: none"> • Ancient Woodland to the south of the site; • North-south native tree belt; • Intact native hedgerows; • Individual mature trees; • Fields in pasture; and • Leylandii hedges. <p>Landscape features within the site are generally intact, however there are opportunities to re-instate boundary features, particularly hedgerows (photograph 1).</p> <p>There is no public access within the site, however there is a footpath adjacent to the western site boundary. The site contributes to the visual amenity of this recreational route.</p>	<p>Public viewpoint locations with open views of the site are limited, however visual receptors are likely to have a high sensitivity to changes within the view.</p> <p>There are open views of the western part of the site from the footpath adjacent to the western boundary. To the north, the footpath follows the access drive into the site, before turning south to the stream. A Leylandii hedge is located at the north-western site boundary and screens views into the site. Visibility opens up again to the south of the hedge (Photograph 2). The eastern half of the site is screened from view by the farm, Leylandii hedges and central tree belt.</p> <p>There are open views of the site access from Furnace Road, however remaining views of the site from this road are restricted to occasional glimpses, seen through gaps between the existing properties and gardens. There are occasional glimpses of the site from the B2100 located to the east of the site.</p> <p>There are distant views of the site from high ground on Hoghole Lane to the south and south-west of the site, as well as from the footpath to the north of Maitlands.</p> <p>There are private views of the site from local properties including dwellings off Furnace Road, Furnace Avenue and the B2100.</p> <p>Visual receptors (public views) to be considered (ordered from higher to lower sensitivity) include:</p> <ul style="list-style-type: none"> • Walkers on the public footpath to the west of the site; • Walkers on distant footpaths to the south of the site; and • Pedestrians and motorists on local roads including Furnace Road and the B2100; 	<p>The two northern fields are small scale, relatively enclosed and intimate. They have an association with the existing edge of settlement and are relatively flat, in contrast to the southern fields, which are more sloping.</p> <p>The character of the northern fields is slightly unkempt and unremarkable. They have boundary features (including garden boundaries and Leylandii hedges) that are more domestic in character than the rural boundary fences and hedges of the southern fields.</p> <p>The southern fields are more typical of the wider landscape. They are located on a south-facing slope and there are long views south from the higher ground. These views are attractive, long ranging and rural in character. The southern fields are very much a part of the wider AONB landscape.</p> <p>The subdivision of the site using post and wire and electric fencing detracts from the overall aesthetic.</p> <p>The site as a whole has a relatively simple pattern and texture, with visual interest ‘borrowed’ from the wider landscape. The site is generally peaceful and rural in character, with a pleasant quality. The site would be more attractive if the fencing subdividing the paddocks was removed or replaced with a more characteristic boundary treatment.</p> <p>There are no known associations with people, places, events, art or literature.</p>	<p>Geology, landform, water systems and climate: The site is located on a plateau of high ground and associated south-facing side-slopes. There are no water features within the site, however a stream is located in the woodland beyond the southern site boundary.</p> <p>Settlement: The site is located to the south of a low density ribbon development spread along Furnace Road. The existing houses have some connection to the rural landscape through the site. Development of the whole site would be inconsistent with the existing settlement pattern.</p> <p>Routeways: Both the footpath to the west of the site and Furnace Lane are mapped as historic routeways. There are opportunities to enhance the ecological function of the footpath to the west of the site.</p> <p>Woodland: The site does not contain any woodland, however there is a shaw of Ancient Woodland to the south of the site and the central tree belt within the site, contributes to woodland connectivity.</p> <p>Field and Heath: The site consists of fields in pasture, although they are currently grazed by horses rather than livestock. The south-eastern field is mapped as having historic field boundaries (see figure L6).</p> <p>Other qualities: The site has some contribution to the land based economy. The site does not contribute to the valued views mapped within the Lamberhurst Neighbourhood Plan. The hedgerows and trees are valued elements set out within the Neighbourhood Plan character assessment.</p> <p>Summary: The site contributes to the small scale pastoral landscape of the AONB. The northern fields are more enclosed and have a stronger relationship to settlement than the southern fields, which are wholly rural in character.</p>

Figure L9: Allocation proposal (from policy)

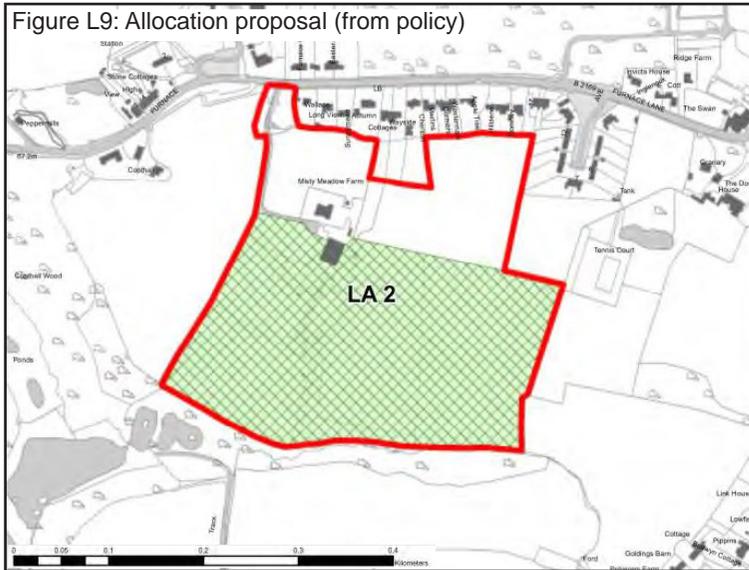
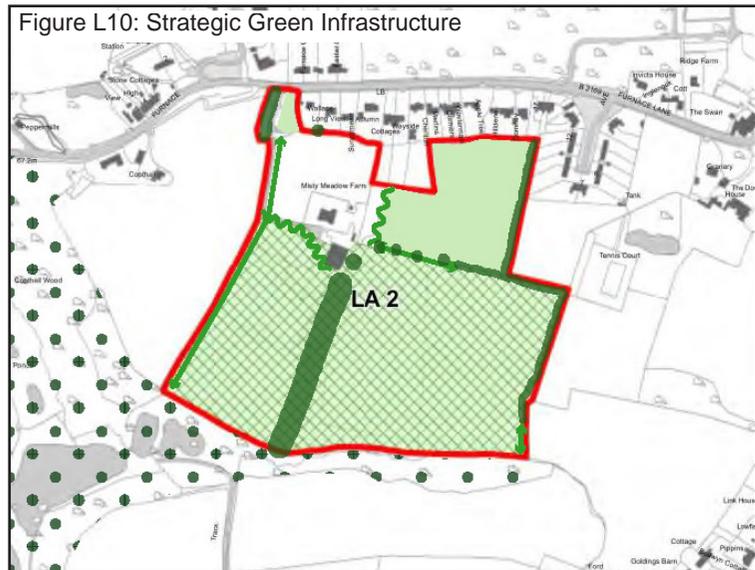


Figure L10: Strategic Green Infrastructure



KEY

	Existing GI retained
	Proposed public open space
	Proposed landscape buffer
	Existing / proposed parkland / woodland
	Proposed landscape feature / connection

Description of proposed development:

A residential development for up to 30 dwellings, with the green hatched land to the south of the site to be retained in agricultural use.

Proposed mitigation measures:

Mitigation relating to reg 18 Allocation policy AL/LA 2.	Additional mitigation measures proposed within this study
The two southern fields to be retained in agricultural use (Allocation Plan).	A reduction of the number of proposed houses within the allocation;
The existing barns, hardstanding and ménage within the southern part of the site to be removed and converted back to agricultural land (Policy).	Restrict development to the north-western field, however allow replacement of southern barn, with appropriate barn-style dwelling/s;
Proposals to protect and enhance the amenity of the footpath to the west of the site (Policy).	Retention and protection of key landscape features within the site, including hedgerows and tree belts;
Provision of a single access, utilising the existing access track (Policy).	Explore long-term opportunity to replace the Leylandii hedges with more characteristic landscape features.
The design of the scheme to give consideration to it's edge of settlement location and to be set back from the eastern and western boundaries. The design and layout is to be informed by an LVIA (Policy).	Promote a soft edge to the south of the settlement.
The development should provide amenity and natural green space (Policy).	
Proposals to contribute positively to Biodiversity Opportunity Area targets (Policy).	

Landscape and recreational opportunities:

Opportunities within the site to improve recreational facilities and enhance landscape character include:

- Diversification of agricultural land within the southern fields, including improved management and use of existing landscape features;
- Improvements to biodiversity, including improved habitat connectivity via the introduction of new hedgerow boundaries and tree belts, and the creation of new complementary grassland habitats; and
- Opportunities for new informal routes and improvements to the existing footpath to the west of the site;

<p>Potential Landscape effects (Assuming no mitigation)</p>	<p>Potential effects on Visibility (Assuming no mitigation)</p>	<p>Assessment of effects against the landscape character components of the High Weald AONB Management Plan (assuming no mitigation)</p>	<p>Potential to avoid or reduce adverse effects (draft policy AL/LA 2, the site analysis plan for the site and the text on mitigation measures opposite, set out the proposed mitigation for the site)</p>
<p>The quantum of development proposed within the draft allocation is likely to give rise to adverse effects on settlement character as it would create a backland development that is at odds with the existing pattern of development within The Down.</p> <p>The retention of the sensitive southern fields within agricultural use, would, in part, moderate the effects of the development within the site, particularly on the wider rural landscape.</p> <p>Due to the relatively enclosed nature of the northern fields within the site, development within the proposed allocation would have limited effects on the 'Bayham Wooded Farmland' Character Area. If no mitigation planting is assumed, development within the north-eastern part of the site may have some influence on adjacent landscape character.</p> <p>Within the site the change in character would be more pronounced; with pasture being replaced by development and open space.</p> <p>Predicted effects on landscape features:</p> <ul style="list-style-type: none"> • Ancient Woodland to the south of the site - potential for no adverse effects; • North-south native tree belt - potential for no adverse effects; • Intact native hedgerows - potential for no adverse effects; • Individual mature trees- potential for no adverse effects; • Fields in pasture - loss of the two northern fields; and • Leylandii hedges - potential for retention, loss or replacement. <p>The effects on recreation within the site would be positive as there are currently no recreational opportunities within the site.</p>	<p>The existing containment of the proposed development area would restrict the visibility of the proposed development, particularly if the existing boundary vegetation and farmstead are retained.</p> <p>There would be open views of the western part of the proposed development site from the footpath adjacent to the western boundary. The proposed dwellings would be located in a part of the site where housing is part of the existing view (photograph 2). The magnitude of change would depend upon the retention of the existing Leylandii hedgerows and the consistency of the housing design with the existing view. The long views to the south would be maintained.</p> <p>The open views of the site access from Furnace Road would change from views of a track to views of a road junction. There would be occasional partial views of the proposed dwellings, seen behind the existing housing lining the road. There would also be occasional glimpses of the proposed development from the B2100 located to the east of the site, however the majority of the site would remain consistent with the baseline view.</p> <p>There would be distant views of the rooftops of the proposed housing from Hoghole Lane to the south and south-west of the site, and from the footpath to the north of Maitlands. The housing would comprise a small part of the overall view and would be seen in the context of existing housing. The development of the site may be visibly at odds with the settlement pattern of The Down from these locations, however this is likely to be dependent on design.</p> <p>Private views: The proposed development would be visible from local properties notably the dwellings off Furnace Road, and to some degree the properties on Furnace Avenue and the B2100.</p>	<p>Geology, landform, water systems and climate: No water features, or sandstone outcrops would be affected by the proposed development. It is unlikely that the development would have adverse effects on existing landform.</p> <p>Settlement: Development of this quantum within the site is likely to adversely effect the settlement pattern of The Down and would limit the connection to the countryside for a small number of properties.</p> <p>Routeways: The proposals may have some adverse effects on the routeway to the west of the site, particularly if the Leylandii hedgerow is removed without replacement. There are opportunities to improve the southern section of the routeway. The proposed site access may have some effects on Furnace Road, however it is likely to be limited in extent, if sensitively designed.</p> <p>Woodland: The proposed allocation would not result in the loss of Ancient Woodland or mapped woodland. There is the potential for improved management within the central tree belt.</p> <p>Field and Heath: The proposals involve the loss of agricultural land, however the field with the greatest time-depth and mapped historic field pattern, would be retained within agricultural use. There is potential for the fields within the southern part of the site to be enhanced, both in terms of character and biodiversity.</p> <p>Other qualities: The rural fields to the south of the site are proposed for retention, which would protect the most sensitive area of the site. Development within the northern fields has the potential to adversely affect settlement pattern and to introduce settlement into a rural landscape. The development could increase light pollution and noise within the local area.</p>	<p>A reduction in the quantum of development and confining the new dwellings the north-western corner of the site would be more in keeping with the existing settlement pattern of The Down. It would also restrict built development to the most contained part of the site, which would minimise the adverse effects on the wider landscape and would protect the character of the majority of the site.</p> <p>The retention of existing features would be possible within the retained open space and there are opportunities to enhance the landscape within the rest of the site. Potential enhancements include; improving the species diversity of the grassland, planting new hedges and tree belts.</p> <p>There are opportunities to replace the Leylandii hedges in the long term with more characteristic landscape buffer planting. This would improve the amenity and biodiversity of the footpath to the west of the site, which is mapped as a historic routeway. Further enhancements could be implemented along the southern section of the footpath, however these would need to be balanced against the existing attractive character and outlook from the path.</p> <p>The large area of the site that would be left undeveloped provides opportunities for informal recreation, particularly in the north-eastern field or around the perimeter of the site.</p> <p>These measures would protect areas which contribute to the character and appearance of the AONB, and would create beneficial new landscape features.</p>

Conclusions:

The site is characteristic of the AONB landscape and the southern fields in particular have strong links to the wider rural landscape. The northern fields (particularly the north-western field) are more contained and have a stronger relationship with existing settlement.

While the northern part of the site is relatively well contained, and the retention of the southern part of the site provides opportunity for localised enhancements, the scale of development proposed within the draft allocation is at odds with the existing settlement pattern of the hamlet. The Down is a low- density settlement and the site sits on the edge of that settlement to the south of a ribbon development that is generally one dwelling deep. It has been assessed that the proposed allocation of ~30 new homes is likely to harm to the character of the hamlet.

If development is to be brought forward within the site, it is recommended that it should be restricted to the north-western field and should be implemented as a low-density cluster, which reflects the farmstead character or settlement cluster to the north-west of the site. The number of dwellings proposed should be reduced by at least 50%. This would be more consistent with the emerging Neighbourhood Plan.

The development of the site does offer opportunities for enhancements, which could enhance the landscape of the AONB within the areas of the site allocated for agriculture and open space land uses.

Policy recommendations for the Regulation 19 version of the Draft Local Plan include:

- Reduce the proposed allocation within the site or remove the site as an allocation.
- Restrict development within the site to the north-western field.
- Include wording to protect trees within the site as well as hedgerows.

6.9.6 Cumulative effects of development proposed at Lamberhurst

6.9.6.1 There are two sites within Lamberhurst that have been put forward as allocations for development. Site LA 2 has been discussed within this study, whereas Site LA 1 (identified in blue) falls outside the scope of this assessment. Both sites include relatively low numbers of proposed dwellings, with the majority of both sites being retained as either agricultural land, open space or safeguarded land for a school.

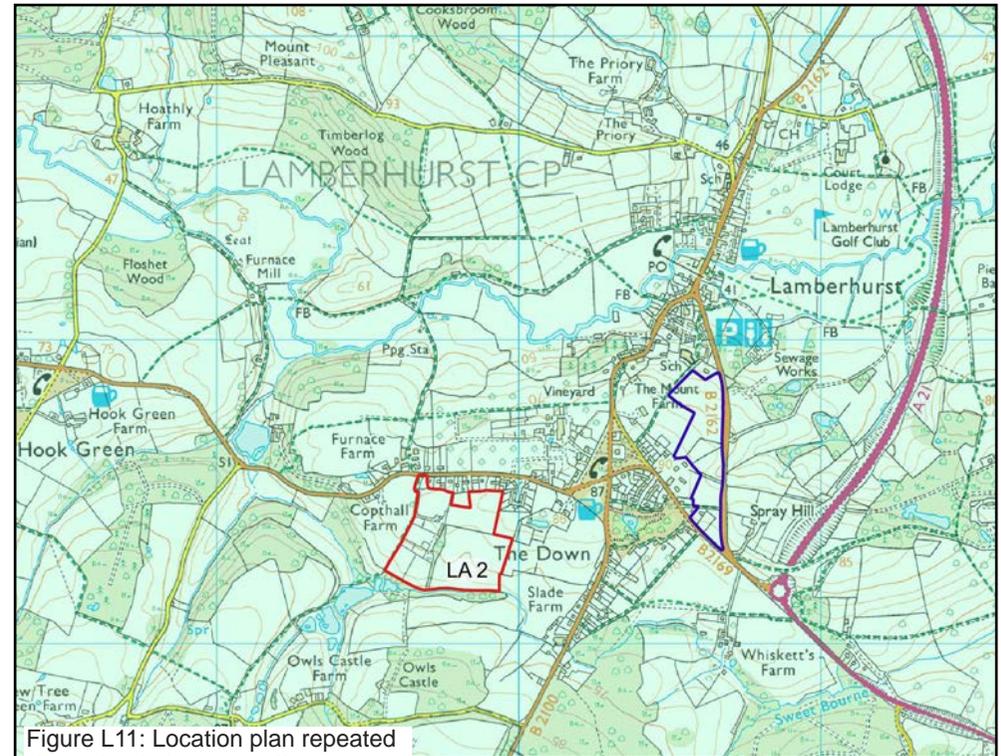
6.9.6.2 Both sites propose new housing adjacent to the hamlet 'The Down', which has the potential for cumulative effects with respect to settlement pattern and size. The proposals are located on different sides of the hamlet, and there are unlikely to be any cumulative visual effects. The draft allocations also lie in different character areas, so the cumulative effects on the wider landscape character are likely to be limited.

6.9.6.3 Both draft allocations propose a significant amount of space to be retained as undeveloped land, which offers opportunities for enhancement. There is therefore the potential for cumulative benefits in terms of biodiversity and the creation of new characteristic landscape features.

6.9.6.4 There are unlikely to be cumulative effects between these sites and other development proposed within the AONB.

6.9.6.5 The likelihood of potential cumulative effects on the landscape and character of the High Weald AONB could be reduced by:

- Reduction in the volume of development proposed within draft allocation LA 2 or the removal of LA 2 as an allocation;
- Sensitive location of development within each site, following the recommendations set out for each site within the site specific policies and within this report;
- Retention of key landscape features; and
- Maximisation of mitigation measures and enhancements proposed within each site.



6.9.7 Summary and conclusions

6.9.7.1 The quantum of development proposed within draft allocation LA 2 is likely to give rise to adverse effects on the settlement pattern of The Down and consequently the AONB. It is possible that a sensitively designed scheme with reduced numbers, confined to the north-western part of the site, would reduce the predicted adverse effects. If the allocation is put forward within the regulation 19 draft plan, it should be supported by enhancements within the remainder of the site.