

Examination of the Tunbridge Wells  
Borough Local Plan

**Tunbridge Wells Borough Council**  
**Hearing Statement**

**Matter 13: Landscape, Local Green  
Space and Open Space, Sport and  
Recreation (Policies STR8, EN8,  
EN15, EN16, EN17, EN18, EN19,  
OSSR1 and OSSR2)**

**Issue 1: Landscape within the Built  
Environment**

**Issue 2: Arcadian Areas**

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# **Matter 13 – Landscape, Local Green Space and Open Space, Sport and Recreation (Policies STR8, EN8, EN15, EN16, EN17, EN18, EN19, OSSR1 and OSSR2)**

## **Issue 1 – Landscape within the Built Environment**

**Inspector’s Issue 1 Question 1: [re. Areas of Important Open Space, Areas of Landscape Importance and Important Landscape Approaches]**

*What are Areas of Important Open Space, Areas of Landscape Importance and Important Landscape Approaches? How have they been defined and are they appropriate and justified?*

1. The response to this question is combined with the response to question 2 below.

## **Issue 2 – Arcadian Areas**

**Inspector’s Issue 2 Question 1: [re. Arcadian Areas]**

*How have the Arcadian Areas been defined and are they justified, appropriate and effective land use designations?*

### **TWBC response to both Issue 1 and Issue 2 questions**

#### **Introduction**

2. These areas were first identified in the adopted Local Plan, March 2006 under Policies EN21, EN22, EN23 and EN24 (pages 4-29 to 4-35) under the heading of ‘*The Environment within the Limits to Built Development*’ and are now set out in the Submission Local Plan (SLP) under the heading ‘*Landscape within the Built*

*Environment* on pages 368 to 374 under Policies EN16 Landscape within the Built Environment and EN17 Arcadian Areas.

3. The areas to which these policies apply were identified through desktop and field surveys conducted by Council officers from around 2000/2001 using the criteria set out in the Local Plan 2006 and are summarised individually below, but collectively these areas have been identified because they “*contribute to the character and appearance of built up areas*” (SLP paragraph 6.188) in a positive way through the spaces and vegetation that they contain and the contribution they make to local character and visual amenity.
4. In summary, the designations may be described as follows:

### **Areas of Important Open Space**

5. An open space may be important visually for a number of sometimes overlapping reasons, which include:
  - Historic Importance
  - Local Visual Amenity Value
  - Open Spaces of Strategic Importance (e.g. long views or part of setting/character of settlement)

### **Areas of Landscape Importance**

6. Where spaces within a built-up area have a large degree of tree or vegetation cover, they are particularly important for their visual amenity value and the contribution they make to local character, air quality, and flood mitigation, but may be designated for a number of sometimes overlapping reasons:
  - Landscape of Historic Importance
  - Neighbourhood Edges (e.g. providing visual or physical separation between separate communities)
  - Landscaped Skylines

- Wider Landscape Significance (e.g. contribution to wider character and setting, wildlife or green infrastructure).

### **Important Landscape Approaches**

7. Important Landscape Approaches are stretches of landscape areas that are along access routes leading to settlements that are principally lined with mature hedges and native trees that partly conceal built development. They give the impression of the countryside extending well into the built-up area.
8. Such landscaped approaches have been identified in Royal Tunbridge Wells, Southborough, Cranbrook, Benenden, Brenchley, Pembury, and Speldhurst, and are defined on the Policies Map.

### **Arcadian Areas**

9. Arcadian Areas are defined as areas of significance for their strong and dominant visual element of landscaping, in which buildings are low density, of a large domestic scale, generally two storeys in height, and set well apart, with substantial, normally landscaped, gaps between.
10. In such areas, there are a large proportion of trees, often specimen trees and exotic species, and most boundaries, including road frontages, are formed by dense hedges and trees. Access openings to properties are normally narrow and do not expose views of the principal building. Car parking is generally low key and well screened.
11. Buildings are also frequently located some distance from front and rear boundaries, and many areas are also characterised by uniform front and rear building lines. Plot layout is often along a gently curved road that lacks formal kerbs.

### **Consideration**

12. The first three of the above designations have been combined into a single policy, EN16, as the objectives for each policy previously were almost identical in that they did not prohibit development but sought to maintain the contribution they made to character and appearance.

13. The previous policy for Arcadian Areas, whilst again not prohibiting development, had more prescriptive criteria. The wording and meaning for these policies have essentially been retained for the proposed Policies EN16 and EN17 in the SLP.
14. Whilst there has been considerable change in national policy since the consideration of the policies within the adopted Local Plan 2006, there is nothing to suggest that highlighting the importance of such areas and features of the borough in a Local Plan is no longer supported. In fact, the contrary may be said in that national and local policies acknowledge the importance of urban green spaces and features as part of green infrastructure in relation to climate change, air quality, good design, and mental health and wellbeing.
15. Support for this approach can be found in the NPPF in the ‘environmental objective’ (paragraph 8) which includes “*protect and enhance our natural, built and historic environment*” and “*mitigating and adapting to climate change*”. The requirements of its paragraph 130 are also promoted by these policies:

*“130. Planning policies and decisions should ensure that developments:*

- (a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- (b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- (c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);”*

16. As noted above, these designations contribute to the green infrastructure of the borough and the Planning Practice Guidance notes that green infrastructure can help with:

***“Building a strong, competitive economy***

*Green infrastructure can drive economic growth and regeneration, helping to create high quality environments which are attractive to businesses and investors.*

***Achieving well-designed places***

*The built environment can be enhanced by features such as green roofs, street trees,*

*proximity to woodland, public gardens and recreational and open spaces. More broadly, green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place and natural beauty.*

### ***Promoting healthy and safe communities***

*Green infrastructure can improve the wellbeing of a neighbourhood with opportunities for recreation, exercise, social interaction, experiencing and caring for nature, community food-growing and gardening, all of which can bring mental and physical health benefits. Outdoor Recreation Value (ORVal) is a useful online tool that can be used to quantify the recreational values provided by greenspace. Green infrastructure can help to reduce health inequalities in areas of socio-economic deprivation and meet the needs of families and an ageing population. It can also help to reduce air pollution and noise.*

### ***Mitigating climate change, flooding and coastal change***

*Green infrastructure can contribute to carbon storage, cooling and shading, opportunities for species migration to more suitable habitats and the protection of water quality and other natural resources. It can also be an integral part of multifunctional sustainable drainage and natural flood risk management.*

### ***Conserving and enhancing the natural environment***

*High-quality networks of multifunctional green infrastructure contribute a range of benefits, including ecological connectivity, facilitating biodiversity net gain and nature recovery networks and opportunities for communities to undertake conservation work.”*

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17. As such, it is felt that these designations, which have endured and been valued since 2006, are justified and should be retained. It is, however, recognised in the supporting text for these policies (paragraph 6.191) that the policies are at risk of becoming dated and that measures in this Plan, including new designations such as local green space or neighbourhood plans may have an effect on these designations. In addition, new and emerging considerations, including emerging legislation and guidance covering green infrastructure, climate change, carbon and biodiversity may lead to a different policy

approach. Under these circumstances, and mindful of the resource implication in preparing a new Plan, the Council has decided that the most appropriate course of action is to carry forward these designations but to review them as part of the first revision of the Local Plan and/or have them reviewed through neighbourhood planning.

18. It is notable that there were no objections to these policies at Regulation 19 stage, but there was strong support from CPRE (PSLP\_612), Royal Tunbridge Wells Town Forum (PSLP\_741), and Culverden Residents Association (PSLP\_757).

## **Conclusion**

19. In summary, Policies EN16 Landscape within the Built Environment and EN17 Arcadian Areas identify key features and characteristics of the urban area that make a positive contribution to character and appearance and green infrastructure and have value in terms of climate change, air quality, good design, and mental health and wellbeing. The Council seeks to retain these designations but has also set out an intention to review them to take account of emerging guidance and legislation as well as any changes in circumstances following adoption of the Local Plan.