

# AONB SETTING ANALYSIS REPORT

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Prepared for Tunbridge Wells Borough Council

By

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HDA Document Control and Quality Assurance Record

## 1. Introduction

1.1 This AONB setting analysis report has been commissioned by Tunbridge Wells Borough Council (TWBC) in order to provide an analysis of potential strategic sites outside the High Weald Area of Outstanding Natural Beauty (AONB) and any larger sites or group of sites that might give rise to concerns over the setting of the AONB. For the purposes of this assessment the following Regulation 18 proposed allocations considered include:

- Allocations at Paddock Wood, including land east of Capel Parish
- Tudeley Garden Village
- Allocations at Horsmonden;
- Benenden Hospital; and
- Sissinghurst

1.2 These areas are identified on Figure 1 and the key Diagram of the Tunbridge Wells Borough Draft Local Plan Regulation 18 Consultation Draft. This report does not specifically assess the potential effects of proposed major infrastructure schemes, which fall outside of the brief provided, but has considered likely effects of infrastructure associated with the development.

1.3 The aim of this study is to provide clear and concise advice concerning the potential issues pertaining to each potential settlement or allocation in relation to the setting of the AONB, as a result of the development proposed, in order to assist the council in discharging its statutory duty with regards the High Weald AONB and with its decision making in relation to the Regulation 19 iteration of the Draft Local Plan. Other landscape and visual effects that do not relate specifically to the setting of the AONB fall outside the scope of this report.

1.4 It should be noted that the vast majority of the borough (70%) lies within the AONB and that in order to minimise the adverse effects on the High Weald AONB and comply with paragraph 172 of the National Planning Policy Framework, the council should be seeking to maximise the development potential of the land outside the AONB. This has been the case with the regulation 18 draft Local Plan. As a result there are likely to be effects on the setting to the AONB, however this should not be confused with the potential direct effects of development within the AONB, which is given additional weight in both national and local planning policy.

## **2 Planning policy context**

### **2.1 Introduction**

2.1.1 The following narrative provides a summary of planning policies of relevance to the proposed allocations with respect to the AONB designation noting however that the sites that fall within this study do not lie within the AONB but adjacent or close to it. It should also be noted that decisions to take forward any of the proposed sites will be made in the light of the National Planning Policy Framework (NPPF) , taken as a whole, and national and local policies which will be considered in their entirety and not in the application of the landscape policies in isolation as set out below.

2.1.2 Section 85 of The Countryside and Rights of Way Act 2000 states that:

*'In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty.'*

The wording of the Act highlights the Council's responsibility to consider the wider context of potential effects of a development on a protected landscape, balanced with the requirement for sustainable patterns of development.

### **2.2 National Planning Policy Framework (NPPF):**

2.2.1 Paragraph 172 of the Framework states that:

*'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues...'* (Ref 1)

Paragraph 172 relates to land within National Parks and AONB's and does not refer to setting specifically but is relevant to the purposes for which the area has been designated as set out in the NPPG.

### **2.3 National Planning Practice Guidance (NPPG):**

2.3.1 Paragraph 039 (reference ID 8-039-20190721) considers *'How should development within the setting of National Parks, the Broads and Areas of Outstanding Natural Beauty be dealt with?'*. The guidance states that:

*'Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.'*

## **2.4 Local Policy**

2.4.1 The Tunbridge Wells Borough Draft Local Plan, Regulation 18 Consultation Draft (20 September to 1 November 2019 – Ref 2) sets out draft policies that would be relevant to the assessment sites within this report. 4.4.2 Of these, Policy EN21 is particularly relevant to this study, which states that:

*'All development within, or affecting the setting of, the High Weald AONB shall seek to conserve and enhance its landscape and scenic beauty, having particular regard to the impacts on its character components, as set out in the High Weald AONB Management Plan.'*

It should be noted that the above is a draft policy, which may be subject to change and review prior to submission for examination.

2.4.2 Adopted Local policy is set out within the Core Strategy, which was adopted in June 2010 (Ref 3). Core policy 4: Environment states that:

*The Borough's built and natural environments are rich in heritage assets, landscape value and biodiversity, which combine to create a unique and distinctive local character much prized by residents and visitors alike. This locally distinctive sense of place and character will be conserved and enhanced as follows:*

- 1. The Borough's urban and rural landscapes, including the designated High Weald Area of Outstanding Natural Beauty, will be conserved and enhanced*
- 2. The Borough Landscape Character Area Assessment 2002 will be utilised to manage, conserve and enhance the landscape as a whole*
- 3. A hierarchical approach to nature conservation and the protection of biodiversity and geodiversity will be applied across the sites and habitats of national, regional and local importance within the Borough. The objective will*

*be to avoid net loss of biodiversity and geodiversity across the Borough as a whole*

4. *Opportunities and locations for biodiversity enhancements will be identified and pursued by the creation, protection, enhancement, extension and management of green corridors and through the development of green infrastructure networks in urban and rural areas to improve connectivity between habitats*
5. *The Borough's heritage assets, including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, archaeological sites and Historic Parks and Gardens will be conserved and enhanced and special regard will be had to their settings*
6. *The positive management of heritage assets through partnership approaches and measures will be encouraged, including by the use of Conservation Area Management Plans.'*

### **3 Setting to the AONB**

#### **3.1 Introduction and definition**

3.1.1 This study seeks to provide information on the potential landscape and visual effects, on the setting of the AONB, resulting from the draft allocated sites considered within this study. Paragraph 037 of the NPPG (reference ID 8-037-20190721) recognises that Landscape and Visual Impact Assessment (LVIA) is an appropriate way to *'demonstrate the likely effects of a proposed development on the landscape'*. HDA have adapted and simplified our LVIA methodology to suit the high-level and setting-specific nature of the report.

3.1.2 The High Weald AONB Management Plan provides the following definition of setting:

*'The term 'setting' is used to refer to areas outside the AONB where development and other activities may affect land within an AONB. Its extent will vary depending upon the issues considered but some can be mapped, for example, the impact of development on views into and out of the AONB...*

*...Not all activities will be detrimental; conservation practices and economic ties outside the AONB can support AONB purpose.'*

3.1.3 In order to consider setting, it is important to understand what characteristics make the AONB special. These are set out within the 'statement of significance' within the AONB management plan.

## 3.2 Methodology for assessment of effects on setting

### Stage 1: Desk study and review

3.2.1 Desk study information was gathered and considered. This included National and Local Planning Policy, Landscape Character Assessments and relevant reports and information produced by the High Weald AONB Board, including the current High Weald AONB Management Plan. Baseline data for the borough was collated and mapped using GIS and other appropriate software. The data was analysed and reviewed along with current aerial photographs to form an initial appraisal of the character of each site, prior to verification by field work. Mapping has included:

- Geology and soils
- Topography
- Land use and landscape features (based initially on aerial photography and OS mapping)
- National, Regional and county / AONB landscape character types and areas, and associated guidelines
- Historic Landscape Characterisation
- Local Plan designations including local landscape, nature conservation, and heritage designation
- Extent of existing built development (Existing limits to built development)
- Listed buildings, Conservation Areas, Registered parks & gardens, Ancient Monuments and historic farmsteads
- Historic mapping
- Ancient Woodland
- Public rights of way (including long distance footpaths etc) and notable viewpoints
- Areas at risk of flooding
- Locally valued features e.g. landmarks
- Any known cultural associations

3.2.2 Responses to the regulation 18 planning consultation from key stakeholders, including the High Weald AONB and Natural England were reviewed along with all

relevant existing studies, available site surveys and any submitted development proposals or representations for each site.

- 3.2.3 The proposed allocations sites set out within this study have been grouped into geographical study areas, generally related to a specific settlement, which enabled potential cumulative effects to be identified. Landscape structure analysis has been undertaken for each study area to identify the main elements which contribute to the character, structure and setting of both the surrounding AONB landscape and the settlements themselves. This information was then 'ground truthed' through field work (Stage 2).

#### Stage 2: Site visits and field work

- 3.2.4 Field assessment has underpinned all subsequent project stages. Site visits were undertaken to identify the extent to which the sites contributed to the setting of the AONB. Notes were taken of the landscape and visual context of the AONB, with respect of the sites and a working photographic record was made.

#### Stage 3: Assessment and Reporting

- 3.2.5 For each settlement / study area, the following information was provided:
- i) A summary of the existing settlement pattern and context.
  - ii) Analysis of the landscape and visual relationship between the proposed settlement expansion / allocations and the High Weald AONB. The analysis considered proximity of the allocation to the AONB, existing landscape character including presence of AONB character components and evidence of special qualities. Key views out of and into the AONB were identified and a summary of the intervisibility between the AONB and the proposed allocation was provided.
  - iii) An outline description of the proposals suggested within the reg 18 Draft Local Plan.
  - iv) An assessment was made of the predicted effects on the setting to the AONB as a result of development of the proposed settlement expansion / allocation. This considered both potential landscape and visual effects, with and without mitigation; and

v) The predicted effects of the allocations within the study area were summarised and conclusions on potential harm to the setting of the AONB were reached. This included consideration of individual allocations which are likely to have the highest and lowest effects on the setting to the AONB;

3.2.6 For consistency, the assessment of effects has been considered in relation to the individual site-specific policies and associated site development maps as set out within the Regulation 18 Consultation Draft Local Plan. The maps set out the site boundary and proposed strategic Open Space and Landscape Buffers considered by TWBC as mitigation for the proposed development areas.

3.2.7 For the purposes of this study, the proposed development areas were initially considered in isolation, without the potential benefits of the strategic Open Space and Landscape Buffers, however only the land put forward for development was assessed at this stage. The introduction of the strategic Open Space and Landscape Buffers was considered to be inherent mitigation already carried out by the Council and is considered within the mitigation section of each site assessment.

3.2.8 The predicted landscape effects of the proposals on the setting of the AONB were assessed using the following considerations:

- Proximity of the settlement expansion / allocation to the AONB
- The extent to which the existing character of the landscape within the proposed allocation is complementary to the character of the AONB and whether the change proposed within the allocation is likely to affect the landscape character of the AONB landscape.
- Would the proposals affect any of perceptual qualities of the AONB, for example: Would there be any direct or indirect effects on tranquillity or rurality?

3.2.9 The predicted visual effects of the proposals on the setting of the AONB were assessed using the following considerations:

- The potential changes to views out of or into the AONB from key viewpoints as a consequence of development within the proposed allocations.
- Whether external lighting associated with development proposals within the potential allocation sites is likely to affect recorded dark skies within the AONB.

3.2.10 Mitigation is defined in the Landscape Institute Guidelines as:

*'Measures proposed to prevent/avoid, reduce and where possible remedy (or compensate for) any significant adverse landscape and visual effects...'* (GLVIA, page 57, para 4.21 – Ref 4).

- 3.2.11 For the purposes of this study, mitigation includes the proposals and strategies put forward by the council within the relevant draft allocation policies and any additional mitigation measures that are deemed to be appropriate in order to reduce the predicted effects on the setting of the High Weald.
- 3.2.12 The potential cumulative effects of different combinations of allocation sites have been discussed for each study area. This considered combinations of effects expected by the development of multiple sites, which are predicted to result in more significant or wider ranging effects than the individual sites in isolation.

## **4 Settlement / site evaluation**

### **4.1 Paddock Wood:**

#### *Settlement pattern and context*

- 4.1.1 Paddock Wood is a town located approximately 13km to the north-east of Royal Tunbridge Wells town centre, 11km to the east of Tonbridge centre and approximately 14km from the centre of Maidstone. The town is surrounded by scattered settlement, small villages and hamlets. The closest settlements are Five Oak Green, located approximately 1.2km to the west, Matfield, located approximately 1.8km to the south (at its nearest point) and East Peckham, located approximately 2.1km to the north (at its nearest point). Despite being a relatively small town, it is one of the largest settlements in Tunbridge Wells Borough and has been identified as a location for major growth – largely due to its location outside the High Weald AONB. This section looks at the potential effects of the major urban extension planned at Paddock Wood on the on the setting to the AONB.
- 4.1.2 Paddock Wood is a nucleated settlement located on the relatively flat and low-lying land of the Low Weald. The town is bisected by a railway line, which runs east-west and north through the settlement and there is a station at the town centre. The majority of the existing housing is located to the south of the railway line and a large employment area is located to the north. A second railway line branches north from the station, to the north-east of the town. The only 'A' road near the town is the A228,

which lies approximately 660m to the west of the town, mid-way between Paddock Wood and Five Oak Green. The B2160 runs north-south through the town and the B2017 runs along the existing south-western edge of the settlement.

4.1.3 Paddock Wood contains a number of facilities including:

- Educational establishments including a secondary and primary school;
- Health facilities including a doctor's surgery and dentist surgery;
- Shops including supermarkets, a post office and convenience stores;
- Employment, including the industrial estate to the north of the town;
- Recreational facilities including a sports centre, pitches and play areas; and
- Community facilities including community centres, churches, library and allotments;

4.1.4 Paddock Wood sits within the rural landscape of the Low Weald. The majority of the town is located on relatively flat low-lying land associated with the broad valley of the River Medway (located to the north-west of the town) and its tributaries including the River Teise (located to the north-east of the town). To the south the land slopes up steeply towards the more undulating uplands of the High Weald. The land to the south of Paddock Wood forms a transitional landscape between the High and Low Weald. Historically the town evolved around the production of hops, which was a major land-use within the local area. The architecture, including the oast houses within and around the town, provide links back to this historic land use.

4.1.5 The land to the west and north-west of Paddock Wood is dominated by arable production within large, irregular fields. This land is largely in the Parish of Capel. Large fields of arable agriculture are also located to the east of the town, between the railway line and Church Road. Fields to the north-west and south of the town are smaller in scale and contain a mixture of agricultural land uses including arable farmland, pasture and orchards. Water features, particularly streams / brooks and drainage channels are common landscape features. Drainage ditches are notable to the north-east of the town, where the fields are subject to flooding and waterlogging. Ponds are common to the south and north-west of the town. The landscape has severable notable blocks of woodland including Fox Hurst Wood, to the south-west, Whetstead Wood to the west and Gedges Wood to the south. Copses are more frequently occurring to the south of the town. Fields are generally bound by hedgerows, tree belts or watercourses.

4.1.6 Paddock Wood is located to the north of the High Weald AONB, approximately 1.1km from the boundary at its nearest point. The proposed urban expansion may affect the setting of the AONB.

4.1.7 Other constraints to development on the edge of Paddock Wood include:

- Green Belt (to the west of the town);
- Listed buildings within and around the settlement;
- Ancient Woodland;
- Ecological / wildlife designations including Local Wildlife Sites and Local Nature Reserves;
- Flood zones, particularly to the north of the railway line;
- Public rights of way linking to the wider rural landscape; and
- Local greenspace.

These designations and development constraints may affect the viability of the proposed allocations, however due to their distance from the AONB, are of limited relevance to the assessment of effect on the setting to the AONB.

4.1.8 Experiential qualities of the AONB that may be affected by the proposed urban expansion to Paddock Wood include:

- Scenic views experienced from the northern edge of the AONB, with particular reference to the mapped viewpoint at Brenchley; and
- Potential for the urban expansion to affect the perception of tranquility and rurality within the AONB. Due to the distance from the AONB boundary, this is unlikely to be a significant issue.

*Relationship between the proposed allocation sites and the High Weald AONB*

4.1.9 Paddock Wood is located to the north of the High Weald AONB. The nearest potential development allocation lies approximately 340m to the north of the AONB boundary, however the edge of the proposed development area within that site is a further 470m from the AONB boundary. As a consequence there would not be any direct effects on the landscape or character of the AONB as a result of the proposed expansion of Paddock Wood. The potential effects of the proposed allocations to the setting of the High Weald AONB would be limited to perceptual effects resulting from changes to views into or out of the AONB.

- 4.1.10 There are two proposed draft allocations associated with the settlement edge of Paddock Wood: AL/PW1 and AL/PW3. Policy AL/PW1 is an umbrella policy covering the urban expansion of Paddock Wood and contains 12 potential allocation parcels. Between them, the allocation sites would extend the settlement edge of Paddock Wood to the east, west, north-west and south. A further two allocation sites (PW2 and PW4) are located within the existing settlement edge of Paddock Wood. Rather than looking at allocation sites on an individual basis, this report will focus on viewpoint locations where one or more of the allocations may be visible from the AONB or might obstruct views back towards the AONB.
- 4.1.11 Much of the AONB boundary is located on high ground but set back from the north facing slopes that overlook Paddock Wood. The high level of tree cover, in addition to hedgerows and orchards, combine to limit views out over Paddock Wood and the surrounding landscape from publicly available viewpoints (see photographs P4-P7). Where views are possible, they are generally limited to distant glimpses of rooftops of the existing industrial buildings, set within a well treed landscape (see photograph P5).
- 4.1.12 The notable exception is from the mapped 'Millennium Viewing Point', on Crook Road to the north of Brenchley (photograph P3), which has panoramic views over the valley to the north, including the northern and eastern edges of Paddock Wood. There are distant open views of the eastern fields of the proposed urban extension, in particular sites PW1\_7, PW1\_8 and PW1\_9, with partial views of the remaining eastern sites and glimpses of the sites to the north-west of the town (photograph P3).
- 4.1.13 Views back towards the AONB are generally screened by landform and intervening trees. Where views are possible, the AONB forms part of a wooded skyline to the south of Paddock Wood. It is difficult to distinguish between the land within the AONB and the north facing slopes located between the edge of the AONB and the southern edge of Paddock Wood. Some of the potential allocation sites (for example PW1\_1 and PW1\_7, contain footpaths which have distant glimpses of the wooded skyline to the south, some of which falls within the High Weald AONB.

#### *Description of the proposals*

4.1.14 The proposals for each draft allocation associated with Paddock Wood are as follows:

Allocation site / draft policy	Draft allocation proposal
AL/PW1	Urban extension including approximately 4000 dwellings, along with employment, education, leisure and health facilities, developed through a comprehensive masterplan approach. See table 4 of Draft Local Plan for a breakdown of individual allocation parcels. Parcel PW1_8 is not proposed for built development.
AL/PW2	Town centre redevelopment.
AL/PW3	Residential development of approximately 425 dwellings with an open space and landscape buffer to the south.
AL/PW4	Provision of a community hub and retention of existing recreation provision.

Further details of the proposals are provided within the draft local plan under each policy heading.

*Predicted effects of the proposed allocation on the setting of the AONB*

- 4.1.15 At this stage the locations of proposed dwellings are unknown and this assessment is considered at a strategic level. This study will identify sites and locations within the sites that may affect the setting of the AONB and will put forward suggestions of appropriate measures that could mitigate for these predicted effects (see Figure P3). These mitigation measures are solely concerned with the protection of the setting of the AONB and do not address any other landscape or visual issues that may arise as a consequence of development within the allocation.
- 4.1.16 The proposed allocation sites correspond to parcels assessed as having a lower sensitivity to development within the Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells (Ref 5).
- 4.1.17 Views of the sensitivity parcels from the High Weald AONB were considered within the ‘visual character’ section for each parcel. With regards to the sensitivity

parcels (PW3, PW5 and PW6) located to the east of Paddock Wood (includes allocation parcels PW1\_7 – PW1\_12) the study states that:

*'The elevation of views from the High Weald creates a strong sense of separation between the AONB and Paddock Wood, which limits the harm to the AONB that would result from development on the valley floor, but extending this far east from the settlement edge would constitute a major expansion into the countryside.'*

4.1.18 The study goes on to state that:

*'Development on the sloping ground at the southern end of the sub-area would represent a more significant encroachment on the immediate setting of the AONB itself.'*

The sensitivity parcels to the west of Paddock Wood are recognised as having a low intervisibility with the High Weald.

4.1.19 These assessments are consistent with the findings of this report. The draft allocations / parcels located to the east of Paddock Wood have the strongest influence on the setting to the AONB. The views from the 'Millenium Viewing Point' are critical in establishing the acceptability of the future masterplan proposed within draft policy AL/PW1, particularly with regards to parcels PW1\_7-11. Development within these parcels would expand the settlement of Paddock Wood significantly from this viewpoint location. The existing settlement of Paddock Wood is largely screened from the High Weald AONB by a combination of flat landform and tree belts. It is possible that a strong landscape structure and carefully designed Green Infrastructure strategy, could substantially reduce the visibility of the proposals in the medium to long term. The location of open space and avoidance of development within parcels PW1\_8, PW1\_10 and PW1\_11 in line with the draft policy, would also reduce the potential for the allocation to have significant effects on the setting to the AONB.

4.1.20 Development within the following draft allocation sites / sub-parcels is unlikely to have adverse effects on the setting to the High Weald AONB:

- AL/PW1 – parcels PW1\_1-6
- AL/PW2
- AL/PW3; and
- AL/PW4

The provision of strong Green Infrastructure within these sites and maintaining vista's towards the AONB from the public rights of way within parcels 1 and 2 of AL/PW1, will further mitigate against any predicted effects.

4.1.21 Design measures that would reduce the predicted effects on the setting to the AONB include:

- Avoidance of development within parcels PW1\_8, PW1\_10 and PW1\_11 in line with the draft policy AL/PW1.
- Avoidance of development within the floodplain to the north-east of parcel PW1\_7
- Promote a landscape led approach to masterplanning that creates a structure to contain the allocation sites which is consistent with the character of the adjacent High Weald. It would be beneficial to include structural planting along Queen Street, Church Road and Mascalls Court Road. All structural planting should be consistent with existing landscape character.
- Test the visibility of proposed development from the 'Millenium Viewing Point', a critical viewpoint location, using wireframes or photomontages in order to fully assess the potential effects on the setting to the AONB. Any LVIA work associated with the proposed development to the east of Paddock Wood, should include this viewpoint location as part of the assessment.
- Any masterplan should adhere to relevant guidance including the National Design Guide and should take inspiration from the High Weald Design Guide and Management Plan.
- Give careful consideration to the views and rural setting of listed buildings and historic farmstead, which are visible within the landscape from the High Weald AONB.

4.1.22 There is the potential for the proposed development to the east of Paddock Wood to harm the setting of the High Weald AONB, however if the stipulations set out within the draft policy are adhered to and a strong and coherent masterplan is developed, with an appropriate landscape structure, the medium and long term effects of the draft allocation may not be significant. Development within the remaining draft allocations and parcels are unlikely to have significant adverse effects on the setting to the AONB.

## 4.2 Tudeley Garden Village:

### *Settlement pattern and context*

- 4.2.1 The proposed allocation site represents a new settlement centred on Bank Farm, mid-way between Tonbridge and Paddock Wood. The Somerhill estate is located on higher land to the west of the site and to the south-east of Tonbridge. The key road and rail transport routes generally run in an east - west direction rather than north - south.
- 4.2.2 The allocation boundary covers a predominantly rural landscape. There is scattered linear settlement associated with the B2017, which forms the southern boundary to the proposed allocation. Tudeley is a small hamlet located on the B2017, at the western edge of the allocation site. To the east of the site, the B2017 connects to Five Oak Green School and then to the village of Five Oak Green, approximately 400m further to the east. A railway line runs east-west across the site and a rural lane, Sherenden Road, crosses the site north-south. Several footpaths run through the site.
- 4.2.3 The allocation site is located on a north facing slope, which is steeper to the south and flattens out towards the north, where it meets the floodplain of the River Medway. Gravel extraction workings are associated with the flat river valley to the north of the site. The site is dominated by large, irregular arable fields, with an area of fields in pasture near the centre of the site, associated with Bank Farm. Field boundaries are predominantly hedgerows, which also line local roads and lanes. Orchards are located in the north-western corner of the site and a solar farm located just beyond the site to the north-east. A watercourse runs north from the south-western site boundary and the site contains ditches and numerous ponds. The site contains small copses, tree belts and small tree groupings associated with ponds. These features are more common to the south of the railway than to the north.
- 4.2.4 The High Weald AONB lies to the south of the B2017 and the northern boundary of the AONB abuts the southern and south-eastern boundary of the proposed allocation. There are numerous listed buildings associated with the B2017, which abut the site boundary. The most notable of these is the Grade I listed 'Church of All Saints' (noted for the stained glass windows by Chagall), located at the western site boundary. Three listed buildings are located within the site, with two at Bank Farm and one at Lilley Farm. A Registered Park and Garden is associated with the

'Schools at Summerhill', approximately 300m to the west of the site, at its nearest point. The proposed allocation contains three small blocks of Ancient Woodland.

4.2.5 A section of the B2017 defines the edge of the AONB and the stretch of this road adjacent to the southern boundary of the allocation is mapped as a historic routeway, as are three footpaths to the south of the site (within the AONB).

4.2.6 Experiential qualities of the AONB that are present within the existing landscape include:

- A sense of rurality and to some extent tranquillity, however the B2017 is a relatively busy Road; and
- Dark skies, however there is some existing influence from settlement at Tonbridge, Paddock Wood, Five Oak Green and to a limited extent, from the properties on the B2017 (England's Light Pollution and Dark Skies map - Ref 6)

#### *Relationship between the site and the High Weald AONB*

4.2.7 The site lies adjacent to the northern edge of the High Weald AONB. The landscape character of the proposed allocation is noticeably different to the land within the AONB, in terms of scale, land use and level of tree cover. This is particularly the case to the north of the railway line, where the flatter landform is more pronounced. The change in character is reflected in the Landscape Character Assessment for the borough, which has separated the land to the north (includes the allocation) and south (AONB) of the B2017 into two different character areas. The High Weald National Character Area has a slightly different boundary alignment and the land between the AONB and the railway line essentially forms a transitional landscape between the high and low weald.

4.2.8 The pattern of landform in this area has an effect on the relationship between the AONB and the site. The AONB land to the south-west of the site forms part of a west-facing valley side, with ghyll woodland located along the line of the watercourse. This part of the AONB is inward facing.

4.2.9 In contrast, the southern edge of the site forms part of a north-facing landscape that continues rising beyond the B2017 and within the AONB, to a high point at Old Furze field. The three arable fields located on the southern boundary of the proposed

allocation have some contribution to the landscape character and setting of this edge of the AONB.

- 4.2.10 Further to the north within the site, the land is both physically and visually separated from the AONB, and the character of the landscape becomes distinct from the High Weald.
- 4.2.11 The combination of landform and tree cover screen the proposed allocation from much of the AONB. Long-range views from high ground are contained by woodland and tree belts within the AONB and short-range views are generally screened by rising land, trees and hedgerows. There are no public viewpoints within the AONB that have views of the whole site. Where views are available, they consist of the southern-most fields within the site.
- 4.2.12 There are open views of the site from sections of the B2017, where it runs adjacent to the allocation boundary (Photograph T5). Generally views into the site are filtered and screened by existing houses and hedgerows lining the road, however a short section of road adjacent to the junction with Sherenden Road, has open views across the site. These views consist of the southern arable field, with the land falling away to a line of trees in the middle distance. A distant ridge forms the skyline to the view.
- 4.2.13 There are partial views of the proposed allocation site from the footpath to the south of the site opposite the junction with Sherenden Road (Photograph T6). Views consist of existing trees and dwellings lining the B2017, with partial views of the southern hedgerow boundary and southern edges of the site in the mid-ground of the view. The distant hills beyond the River Medway form the skyline to the view.
- 4.2.14 There are partial views of the houses, trees and hedgerows at the southern site boundary from the eastern stretch of the Tunbridge Wells Circular Walk, located to the west of the site, between Rushpit Wood and the B2017. The agricultural land within the site is not visible. There are only occasional glimpses of the site from the stretch of the walk to the west of Rushpit woods, including the part of the walk that crosses through the Registered Park and Garden. Views of the site are screened by intervening woodland and rising landform within the AONB.
- 4.2.15 There are intermittent, partial, views of the site from the stretch of the Tunbridge Wells Circular Walk to the south of the site between Old Furze Field and the B2017. This section of the path is lined by trees, which restrict outward visibility.

- 4.2.16 There are views back towards the AONB from sections of footpaths within the proposed allocation site and from stretches of Sherenden Road within and to the north of the site. The AONB landscape forms a wooded skyline to these views, however it is difficult to differentiate between tree cover within the site and that within the AONB beyond. There are long distance views from the greensand ridge, located approximately 7km to the north of the site. The site forms a small and distant part to the view and changes within the site would be difficult to perceive.

*Description of the proposals*

- 4.2.17 The proposed allocation is for a standalone garden village containing between 2500 and 2800 new homes, alongside appropriate employment and open space land uses, developed as part of a comprehensive masterplan. Further details of the proposals are provided within the draft local plan under policy AL/CA1. The proposal may also include a secondary school at the eastern edge of the site. The area of search is identified on Figure T1.

*Predicted effects of the proposed allocation on the setting of the AONB*

- 4.2.18 At this stage the locations of proposed dwellings are unknown and this assessment is considered at a strategic level. This study will identify broad areas of the site that are likely to have the highest effects on the setting of the AONB and will put forward suggestions of appropriate measures that could mitigate for these predicted effects (see Figure T3). These mitigation measures are solely concerned with the protection of the setting of the AONB and do not address any other landscape and visual issues that may arise as a consequence of development within the allocation.
- 4.2.19 The proposed allocation site is predicted to have lower landscape and visual effects on the setting to the AONB than might be expected, given the size of the proposed development, the close proximity of the site to the AONB and the general lack of existing settlement within the site. The strong landscape structure surrounding the site and the fall in landform away from the AONB contain much of the site from view, particularly when combined with the frequent clusters of existing dwellings along the B2017, which provide the impression of a settlement

edge. There are factors that are likely to harm the setting to the AONB and these are considered below.

4.2.20 The land within the proposed allocation site that contributes most to the setting of the AONB is located on the high ground to the south of the site, adjacent to the B2017. This area forms a transition between the AONB and the lower lying land to the north and has characteristics in common with the AONB landscape. This area also has the highest intervisibility with the AONB. Development within the southern areas of the site, without existing housing between the site and the AONB, or the implementation of appropriate mitigation, would create a noticeable change in character to views out of the AONB and may harm the rural character of the adjacent part of the AONB.

4.2.21 Development within the allocation that would block views of the wooded hills within the AONB, which form the skyline from public viewpoint locations within and to the north of the site may also have the potential to harm the setting to the AONB.

4.2.22 Additional factors that may harm the setting to the AONB include:

- A reliance on the B2017 as the main transport network could have substantial adverse effects on the character of the lane (which forms the boundary of the AONB), if significant engineering works were required and / or there were a significant increase in traffic volumes and associated noise.
- New infrastructure may also introduce activity, noise and lighting, which would be detrimental to the qualities of the AONB.
- The number of homes will give rise to increased lighting levels at night and would introduce activity and visitor pressure into this part of the AONB. It should be noted that the recreational opportunities and connectivity to the north, east and west of the site, including the Medway Valley Walk, are equal to those found within the area of AONB to the south of the site.

4.2.23 Design measures that would reduce the predicted effects on the setting to the AONB include:

- Minimise the extent of development within the southern parts of the site, particularly on the high ground that is open to view and is contiguous with the character of the adjacent AONB landscape. It may be possible to provide some development provided that it is appropriately mitigated, however this

would need to be carefully tested as part of the design process. For the purposes of this study, appropriate mitigation could include:

- Setting development back from the AONB edge, particularly at the junction between the B2017 and Sherenden Road to maintain view corridors across the landscape to the north of the AONB boundary;
  - The use of characteristic structure planting including hedgerows and tree belts to assimilate development in with the landscape; and
  - Where new development is proposed in association with existing housing along the B2017, ensure that the new built form has a positive vernacular taking cues from the existing buildings and High Weald Design Guide.
- Promote a landscape led approach to masterplanning that creates a structure to contain the garden village which is consistent with the character of the adjacent High Weald. Any masterplan should adhere to relevant guidance including the National Design Guide, and should take inspiration from the High Weald Design Guide and Management Plan.
  - Give careful consideration to the setting of listed buildings and historic farmsteads, with particular reference to All Saints Church, Tudeley.
  - Provide a design that enhances the character of the B2017 and minimises the potential harm to the character of this rural road. Measures that reduce traffic along the B2017 would be beneficial to the setting of the AONB.
  - Protect views and vistas back towards the AONB (see photographs T4 and T8-T10).

4.2.24 Opportunities exist to improve pedestrian and cycle access into the AONB and connect existing footpaths within the AONB through the site.

4.2.25 If these measures are undertaken it is possible that the proposed allocation could be achieved without significant harm to the setting of the High Weald AONB.

### 4.3 Horsmonden:

#### *Settlement pattern and context*

4.3.1 This section looks at the potential effects of the 3 proposed draft allocation sites at Horsmonden, on the setting to the AONB. Horsmonden is a village located approximately 11.5km to the east of Royal Tunbridge Wells, approximately 9km to

the north-east of Cranbrook and approximately 5km from Paddock Wood. The villages of Brenchley and Matfield are located approximately 2km to the north-west at the nearest point and Goudhurst is located approximately 3km to the south-east. The B2162 runs north-east to south-west through the village and the Brenchley Road and Goudhurst Road run along the southern edge of the village.

4.3.2 Horsmonden is a nucleated settlement with a historic core centred on the village Green and covered by a Conservation Area. The village is located in the rural landscape of the Weald and is surrounded by smaller settlements, farmsteads and scattered dwellings, many of which are also listed buildings. The village contains a number of facilities including a primary school, doctor's surgery, a shop and post office, village halls and recreational facilities.

4.3.3 The village is located on a south-facing valley side slope, with a stream marking the southern edge of the village. To the south of the stream, the land rises again to a high point near Coalbank Wood. The northern part of the village is located on higher ground, which falls away to the north-west to Furnace Pond – a link to the iron industry which formed an important part of the Horsmonden's medieval history. Beyond Furnace Pond, the land rises steeply to Brenchley in the north-west. The land also rises to the north-east of the village at Haymans Hill. Much of the landscape surrounding the village comprises orchards, subdivided by hedgerows and tree belts, which screen much of the village from public view. Small tree copses occur frequently with some larger areas of woodland at Shirrenden Wood to the west, and to the south including Coalbank Wood, Nine Acre Wood and Parsonage Wood. Most of these woodland areas are designated Ancient Woodland.

4.3.4 Watercourses and ponds are common landscape features, particularly within the valleys surrounding the village. Fields in pasture are present on the low-lying land, and there is some land in arable production on the higher ground to the north-west of the village. Two areas of parkland are located to the west of the village however these are not protected as heritage assets. The northern area of parkland forms part of a Local Wildlife Site, in combination with Shirrenden Wood. Field boundaries are predominantly formed by hedgerows or tree belts. Cuttings, tunnels and infrastructure from the former Paddock Wood to Hawkhurst Railway line remain visible cutting through the north and west of the village.

4.3.5 Horsmonden is excluded from the High Weald AONB, with the boundary offset from the village to the east, west and south. The western boundary lies closest to the

village and is approximately 100m from the western extent of the village at its nearest point.

4.3.6 The High Weald Landscape trail, a long-distance route, skirts the edge of the AONB to the south and west of the village. Other public rights of way link the southern and eastern edges of the village with the wider rural landscape.

4.3.7 Experiential qualities of the AONB that are present within the existing landscape include:

- Historic buildings and a strong local vernacular, particularly within the Conservation Area within the centre of the village;
- Tree belts and landscape features, including orchards, that extend from the AONB into the village landscape; and
- Strong connections to the rural landscape through public rights of way.

*Relationship between the proposed allocation sites and the High Weald AONB*

4.3.8 Horsmonden is surrounded on three sides by the High Weald AONB, however the AONB boundary is set back from the village edge. Draft allocation site HO2 is located on the western edge of the village with the northern corner of the allocation adjacent to the AONB boundary at Horsmonden / Brenchley Road. The edge to the AONB is defined by a tree belt, evergreen hedge and woodland. The site is located to the south of Brenchley Road, which is bound to either side by tall hedgerows (photograph H3). The strong containment at the edge of the AONB and site, screens views of the site from publicly accessible viewpoints within the AONB, which accentuates the physical separation between the site and the protected landscape (photographs H2 – H5). There are intermittent glimpses of existing housing to the north of the site from the stretch of the High Weald National Trail to the north-west of the site and partial views of existing settlement seen along Brenchley Road from the edge of the AONB.

4.3.9 Draft allocation site HO1 is located on high ground to the north-west of the village the site is approximately 300m from the nearest edge of the AONB and there is a line of existing buildings (associated with Furnace Lane and the northern end of Gibbet Lane), that sit between the site and the AONB. There is no physical relationship between the site and the AONB. Views out from the AONB boundary to the north-west are screened by trees and woodland, however there are some longer

distance views available from the stretch of the High Weald Landscape Trail on the higher ground associated with Hononton Farm (see photograph H1), within which the houses to the north-east of the site (at Willard Place) are visible. There are distant glimpses of the site, however the site is seen in the context of existing housing.

4.3.10 The draft allocation site HO3 is located to the east of the village and is the furthest removed from the AONB boundary. It is located on rising ground, currently in use as orchard.

4.3.11 As part of the field work for the study, local high points within the AONB were visited, including:

1. The intersection between a footpath and the High Weald Landscape Trail on the AONB boundary to the south of Horsmonden (photograph H4); and
2. Views out from public rights of way from the high ground to the west of Goudhurst (photograph H6).

Orchard trees screened views of the village from viewpoint 1, when the field survey was undertaken (summer months). The visibility of the village is likely to increase in winter, when the trees are not in leaf, however these will remain glimpsed or partial views of the village set within a treed landscape.

4.3.12 One footpath at the edge of Goudhurst had panoramic views over the landscape to the north-east, including distant open views of site HO3. The High Weald Landscape Trail is enclosed by trees and hedgerows to the west of Goudhurst and there were no views of Horsmonden from this visual receptor location.

*Description of the proposals*

4.3.13 The proposals for each draft allocation associated with Horsmonden are as follows:

Allocation site / draft policy	Draft allocation proposal
AL/HO1	Residential development of approximately 45-55 dwellings
AL/ HO2	Residential development of approximately 80-100 dwellings, with an open space and landscape buffer along the western boundary.

AL/ HO3	Residential development of between 100-150 dwellings, with a new health centre / doctor's surgery and safeguarded land for expansion of the primary school. Provision has been made for open space and landscape buffers within the site.
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Further details of the proposals are provided within the draft local plan under each policy heading.

*Predicted effects of the proposed allocation on the setting of the AONB*

- 4.3.14 This assessment is considered at a strategic level and as such this study will identify sites and locations within the sites that may affect the setting of the AONB and will put forward suggestions of appropriate measures that could mitigate for these predicted effects. These mitigation measures are solely concerned with the protection of the setting of the AONB and do not address any other landscape or visual issues that may arise as a consequence of development within the draft allocations.
- 4.3.15 All three draft allocation sites are physically separated from the AONB, such that changes within the sites are unlikely to harm the landscape character of the AONB. Site HO2 is relatively close to the AONB boundary but is separated from the wider AONB by woodland and tree belts. The proposed Open Space and Landscape Buffer proposed to the west of the site is likely to re-enforce this separation. The trees and woodland also screen the site from the majority of the AONB. There would only be glimpses of the proposals seen from isolated viewpoints on the edge of the AONB. The proposed housing would be seen in the context of existing dwellings. It is considered that this draft allocation site would not significantly harm the setting to the AONB.
- 4.3.16 Draft allocation site HO1 is well contained by existing dwellings, despite its elevated location. The site sits well within the existing settlement and where development within the site would be visible from the AONB, it would be seen in the distance, beyond existing housing. The allocation would not visibly expand Horsmonden in views from the AONB and would not obscure any views of the AONB from within Horsmonden.

- 4.3.17 Site HO3 lies furthest from the AONB boundary and the predicted effects of the proposed development on the setting to the AONB would be limited to perceptual effects resulting from changes to views into or out of the AONB. The site is visible within distant views from the high ground within the AONB at Goudhurst. Within these views the development of the site would form a noticeable, if distant expansion to Horsmonden. The prescriptions for the proposed Open Space and Landscape Buffer within the draft local plan policy AL/HO3, would reduce the extent to which the development would appear to expand beyond the existing settlement edge.
- 4.3.18 These findings are consistent with the Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells (Ref 5), which considered the land surrounding Horsmonden. Where discrepancies arise these are due to differences in parcel size and the focus of the sensitivity study on broad landscape and visual issues, whereas this report is specific to the potential effects on the setting to the AONB.
- 4.3.18 Additional factors that may harm the setting to the AONB include:
- The additional housing is likely to increase traffic volumes and associated noise along local roads, which pass through the AONB.
  - The proposed development could give rise to increased lighting levels at night, however the existing size and extent of the village means there is a degree of skyglow. The woodland and tree belts containing the village would also limit the effects of additional lighting on the wider landscape.
- 4.3.19 Design measures that would reduce the predicted effects on the setting to the AONB include:
- Site HO1 – Inclusion of landscape structure planting along the north-eastern edge of the site, adjacent to Gibbet Lane. This would assist in screening both the proposals and existing development from the High Weald Landscape Trail to the north-west of the site.
  - Site HO2 – Create additional woodland at the western edge of the site and north-western corner of the site. Retain the northern boundary hedgerow on the northern boundary along Brenchley Road. If the site access is taken from Brenchley road, it should be located as close to the existing village as

possible (to the east) and any hedgerow loss should be replaced along the road frontage.

- Site HO3 – in addition to conforming to the Green Infrastructure provision set out within the draft policy, test the visibility of proposed development within site HO3 from prominent viewpoint locations at Goudhurst (e.g. photograph H6), using wireframes or photomontages in order to fully assess the potential effects on the setting to the AONB.
- Promote a landscape led approach to masterplanning that creates a structure to contain the allocation sites which is consistent with the character of the adjacent High Weald. Any masterplan should adhere to relevant guidance including the National Design Guide and should take inspiration from the High Weald Design Guide and Management Plan.
- Give careful consideration to the setting of listed buildings, which lie adjacent to the AONB and are protected in their own right.

4.3.20 If these measures are undertaken it is possible that the proposed draft allocations within Horsmonden could be achieved without significant harm to the setting of the High Weald AONB.

#### **4.4 Benenden Hospital:**

##### *Settlement pattern and context*

4.4.1 Benenden Hospital is located approximately 5km to the east of Cranbrook and approximately 3km to the north-east of Benenden. Hemsted Forest is located to the west of the hospital and is a significant feature within the local landscape. Further woodlands are located to the north, east and south-west. Benenden School is located to the south-west of the site, north of Benenden, and is set within a parkland landscape. A 'B' road; Goddard's Green Road, runs south-west to north-east through the site and is the main transport link to the site. There are bus stops on the road within the site. Two rural lanes, Mockbeggar Lane and Green Lane connect the site to the north and south respectively. The landscape surrounding the proposed allocation site is predominantly rural with scattered settlement and farmsteads.

4.4.2 A substantial proportion of the site comprises previously developed land, with associated hardstanding and amenity landscapes forming the remainder of the site.

The site comprises 4 distinct areas. The main hospital complex lies to the south-west. To the north-west is additional parking and large industrial style buildings with hardstanding storage areas and polytunnels. The north-eastern section contains existing housing and a recreation area with grass pitches, tennis courts and car parking. The housing is suburban in character and dominated by semi-detached brick houses. This area is contained to the north and west by Mockbeggar Lane, which is contained to the north by low density dwellings set within substantial landscaped gardens. The south-eastern portion of the site lies to the east of Green Lane and comprises an assortment of buildings, most of which are now disused. Some of these include high-density housing set within a parkland landscape, which extends out to the field in pasture to the west of the site. The buildings have a high massing and display an unusual architectural style which is at odds with the built form within the surrounding countryside and villages.

- 4.4.3 The allocation site is located on the relatively flat ground of a low ridge, which falls away to the north and south. The surrounding landform is undulating and incised by valleys associated with small watercourses. Streams, springs and ponds are frequently occurring landscape features. Land uses surrounding the site include fields in pasture, woodland and some arable agriculture. Fields are irregular, mixed in size and are bound by tree belts or hedgerows with hedgerow trees.
- 4.4.4 The boundary of the High Weald AONB surrounds the site to the east, west and south, from the western side of Mockbeggar Lane to the southern edge of Goddard's Green Road, to the east of the site. The roads and footpaths surrounding the site are mapped as historic routeways on the High Weald AONB database and the field pattern surrounding the site is also mapped as historic. The site has a distinctly different character to the surrounding rural landscape.
- 4.4.5 Other designations pertaining to the site include a listed building within the hospital complex (Lister Wing) to the south-west of the site, parts of site (to the north, south and within the central area) are designated as a Local Wildlife Site and the recreation ground is designated Local greenspace. The woodland surrounding the site to the north, east and west comprise Ancient Woodland and Hemsted Forest comprises Ancient Woodland, which is also Open Access Land and a Local Wildlife Site.
- 4.4.6 Experiential qualities of the AONB that are present within the existing landscape include:

- Mature trees and a connection to the wider wooded landscape;
- A historic building; and
- Parts of the site have attractive views out towards the AONB landscape, particularly to the south and west.

*Relationship between the site and the High Weald AONB*

- 4.4.7 The site lies outside the AONB, however is surrounded by the AONB landscape to the east, west and south. The landscape character of the proposed allocation is noticeably different to the land within the AONB, as it already contains a considerable amount of development, including the hospital complex, which has a different building style, massing and height to surrounding village settlements. The site straddles two borough character areas and is described as having '*an unusual and unique character that is a combination of the village and medical facility*' (Tunbridge Wells Borough Landscape Character Assessment, p77).
- 4.4.8 The north-eastern portion of the site is contained from the AONB by hedgerows, trees and existing built form. The housing within this parcel has some consistency with dwellings in the adjacent areas of AONB. In contrast, the existing built form to the west has a hard edge to the AONB (see photograph 6). Tree belts located to the south of the site break up some of the views of existing buildings from the south, however the height of the existing buildings and elevated topography of the southern part of the site, mean that the site remains prominent in some views from within the AONB.
- 4.4.9 There are open views of the site and existing built form from the footpath to the east of the site (photograph 3). There are intermittent views of the tall buildings within the site from Green Lane and Halden Lane, to the south of the site, through gaps in the roadside hedgerows (photograph 2). Views of the site from Frogs Hole Lane and the footpaths to the south-east of the site are screened by a combination of tree belts, hedgerows and the undulating land form.
- 4.4.10 There are open views of the site from the section of Goddard's Green Road located within the site boundary and outside of the AONB. The site has a limited contribution to the sense of arrival into the AONB to the east and west, although there is a clear distinction between the settlement and the surrounding landscape.

### *Description of the proposals*

- 4.4.11 The proposed allocation is for residential development to provide approximately 66-72 additional dwellings (on top of those already existing within the site), alongside additional facilities, open space and enhancements to the local wildlife site.

### *Predicted effects of the proposed allocation on the setting of the AONB*

- 4.4.12 At this stage the locations of proposed dwellings are unknown, however, given the developed nature of the site, and the protection of the existing sports field and open space to the north of the site, it is likely that the proposed dwellings would involve the intensification or re-development of existing built form within the site, including development in the south eastern corner. As such it is unlikely that there would be a significant departure from the baseline situation, providing that the design of the proposals follow local policy and relevant design guidance (including that produced by the High Weald AONB).
- 4.4.13 The land within the proposed allocation site that contributes most to the setting of the AONB is located at the eastern edge of the site and on the high ground to the south of the site. Both of these areas contain existing built form. Insensitive development may harm the setting to the AONB, however it is likely that new and well-designed dwellings will have beneficial effects on the setting to the AONB in comparison to the existing situation. There is potential to improve the landscaped edge to the site, and tree / woodland connectivity through the site, which would be beneficial to the AONB.
- 4.4.14 Further tree planting to soften views into the site from the footpath (also a historic routeway) to the west of the site, would also be beneficial.
- 4.4.15 Additional factors that may harm the setting to the AONB include:
- The additional housing is likely to increase traffic volumes and associated noise along Goddard's Green Road and other local roads, however the limited number of dwellings proposed indicates that this increase would not be substantial.
  - The proposed development could give rise to increased lighting levels at night, however the site already contains external lighting and the change in night-time light levels may not be noticeable from the AONB. There is the potential

that replacement / upgrade of existing lighting could reduce light emissions from within the site, which would be beneficial.

4.4.16 Design measures that would reduce the predicted effects on the setting to the AONB include:

- Maintain the Open Space and landscape buffer set out within map 74 within the draft policy for the site (AL/BE4).
- Maintain and enhance the soft landscaped edges to the site and provide additional planting to the west of the site.
- Any development proposals should adhere to relevant guidance including the National Design Guide and should take inspiration from the High Weald Design Guide and Management Plan.
- Give careful consideration to the setting of the listed buildings within the site.
- Seek opportunities to reduce the existing light emissions of the site, using more efficient and directional external lighting.

4.4.17 Opportunities exist to improve pedestrian access into the AONB and connect existing footpaths within the AONB through the site.

4.4.18 In conclusion the potential for the proposals to harm the setting of the AONB is lower than the potential for the proposals to improve upon the existing situation. It is unlikely that the proposals would have a significant adverse effect of the setting to the High Weald AONB.

## 4.5 Sissinghurst:

### *Settlement pattern and context*

4.5.1 This section looks at the potential effects of the 6 proposed draft allocation sites at Sissinghurst, on the setting to the AONB. Sissinghurst is a small village located approximately 2.2km to the north-east of Cranbrook town centre. The A262 runs east-west along the southern edge of the village, connecting to Biddenden in the east and the hamlet of Wilsley Pound, located approximately 600m to the west. This road forms one of the main connections to Royal Tunbridge Wells, which is located approximately 20.9km to the west of Sissinghurst. The A229 runs north-south along the western edge of the village, connecting to Cranbrook in the south and

Maidstone, approximately 18km to the north. The village has relatively good transport connections for such a rural location.

- 4.5.2 The historic core of the village centres on the A262. The settlement has expanded north along Common Road and west, in close proximity to the hamlet of Wilsley Pound (located at the crossroads of the A229 and the A262). The village and adjacent hamlet form a loose triangle shape of settlement between the three roads (A262, A229 and Common Road). Sissinghurst contains a primary school and facilities including a village hall (located within site CRS14), shop and pub. The village also has a playing field, to the west of the village hall and a cricket club, to the west of the village. Sissinghurst Castle is located to the north-east of the village, which contains historic buildings and is a Registered Park and Garden. The Castle Garden is a popular National Trust destination.
- 4.5.3 The village and adjoining land between Sissinghurst and Wilsley Pound, is located on a relatively flat plateau of high ground, which falls away to steep valley features located to the south, east and west. The valleys contain streams, and lakes are a common landscape feature. The land continues rises to the north, to a high point adjacent to Hillywood House. The landform reflects the undulating landform that is a characteristic of the High Weald. There are large areas of woodland in the landscape surrounding both settlements and there is a high level of tree cover within and between the two settlements. The wider rural landscape is in agricultural use, dominated by fields in pasture, with orchards located to the east of Sissinghurst and west of Wilsley Pound. Some of the land to the south of the A262 is in arable production. Fields vary in size but are generally geometric in shape. Field boundaries vary, but are generally hedgerows or tree belts, with fields subdivided by fencing.
- 4.5.4 Sissinghurst is located to the north of the High Weald AONB. Part of the AONB boundary runs along the A262 to the south-west of the village, before running south and east along a footpath to the south of the village. The boundary then follows the line of Chapel Lane, which runs south from the south-eastern corner of the village. None of the draft allocation sites lie within the AONB, however two abut the boundary to the AONB and the remaining three lie within 560m of the AONB boundary. The historic core of the village is designated as a Conservation Area, as is the hamlet of Wilsley Pound. Sissinghurst Court is a Registered Park and Garden,

located to the south of the village, to the south-east of site CRS13. The historic park includes listed buildings.

- 4.5.5 The village contains a number of listed buildings, located within the Conservation Area and associated with the three roads at the periphery of the two settlements. The two sports grounds and a small rectangular area (located between Mill Lane and Cleavers) are designated Local Greenspace.
- 4.5.6 Public rights of way connect the village and hamlet to the wider rural landscape, including the AONB to the south. Beyond the settlement edge, areas of the wider landscape are covered by designations, including tracts of Ancient Woodland to the north-east and west. Sissinghurst Park Wood (located to the north-east of the village) is a SSSI and Ancient Woodland. The woodland to the east of the village and Roundshill Wood (both associated with Sissinghurst Castle are designated as Local Wildlife sites, Ancient Woodland and are open access land. The parkland between these two areas of woodland is included within the Local Wildlife Site designation and forms part of the Registered Park and Garden associated with Sissinghurst Castle.
- 4.5.7 Experiential qualities of the AONB that are present within the existing landscape include:
- Historic buildings and a strong local vernacular, particularly within the two Conservation Areas;
  - Tree belts and landscape features, including orchards, that extend from the AONB into the village landscape; and
  - Strong connections to the rural landscape through public rights of way.

*Relationship between the proposed allocation sites and the High Weald AONB*

- 4.5.8 Sissinghurst village lies adjacent to the northern edge of the High Weald AONB and the AONB boundary runs through the hamlet of Wilsley Pound, along the alignment of the A262. The AONB boundary follows the line of the A262 to the south-west of Sissinghurst, before turning south opposite Mill Lane and following a footpath east to Chapel Lane, at the south-east of the village. The A262 forms the boundary between two Borough Landscape Character Areas, with Sissinghurst Wooded Farmland Character Area to the north of the road and the Cranbrook Fruit Belt to the south. Both Sissinghurst and Wilsley Pound are well treed, with soft edges to

settlement. The settlements are surrounded by small scale fields, which are different in scale and land-use to the larger arable fields within the AONB and adjacent to the southern edge of the village. The flat, plateau landscape between the two settlements is distinct from the wider rural landscape, both in terms of landform and conformity to an evolving settlement pattern of infill housing between the A262, A229 and Common Road.

- 4.5.9 The pattern of landform in this area has an effect on the relationship between the High Weald and the village. The AONB land to the south of Sissinghurst forms part of a south-facing valley side, with blocks of woodland located along the valley floor and parts of the northern slopes. This part of the AONB is inward facing
- 4.5.10 There are 6 proposed draft allocation sites associated with the settlements of Sissinghurst and Wilsley Pound. Of these, the two that are closest to the AONB are CRS13 and CRS14. Both of these sites are located on the south-western edge of the village, adjacent to the northern edge of the AONB. Site CRS13 is located to the north of the A262, which forms the boundary to the AONB. The hedgerow and tree belt on the southern boundary of the site lines the road, screening the site from view. The site is bound to the east by Mill Lane, with a line of existing dwellings, located to the east of the lane. The existing land use within the site is consistent with the AONB to the south, however the site is surrounded by housing on three sides and development of the site would be consistent with the emerging settlement pattern. Views into the site from the wider AONB are screened by the trees and hedgerows lining the A262 (photograph xx).
- 4.5.11 Site CRS14 is located to the south of the A262, beyond a line of existing dwellings. Sissinghurst Village Hall (St George's Hall) is located within the north-western corner of the site, with the recreation ground and tennis courts to the west. The eastern boundary is shared with properties lining the A262 and The Street. The site abuts the Sissinghurst Conservation Area. The southern boundary is formed by a mature hedgerow, beyond which is a public right of way and the northern edge of the AONB. The hedge screens views into the site from the south. To the south-west, gaps in the tree belt afford views into the field to the west of the site, including views of the tennis court and existing properties lining the A262 (photograph 1). To the south-west of the site the AONB boundary abuts the existing settlement edge. Aside from glimpsed views into the site from the section of footpath adjacent to the

southern site boundary, the site is not visible from the AONB. Views from the footpath are already influenced by the existing settlement edge.

4.5.12 Sites CRS12 and CRS17 are located to the north-west and north of the village respectively and are both physically and visually separated from the High Weald AONB. There are no views into the AONB from either site, including from the public right of way which passes through site CRS17.

4.5.13 Sites CRS 15 and CRS16 lie adjacent to each other on the western edge of the village, to the west of the A229. The alignment of the sites is consistent with the north-western edge of the settlement. The visibility of these sites from within the AONB is extremely limited and any views of the sites from the AONB would be seen in the context of existing settlement.

4.5.14 As part of the field work for the study, local high points within the AONB were visited, including:

- The footpath east of Wilsley Green, through the parkland of Oak Hill Manor (photograph 4);
- Golford Road; and
- The footpath leading north on the high ground to the south-west of Golford (photograph 5).

While viewpoints had attractive and sometimes long-ranging views, the settlement of Sissinghurst and the potential allocation sites, were either not visible or were difficult to perceive.

4.5.15 Views back towards the AONB are limited by landform and tree cover. There are intermittent long ranging views towards the AONB from the bridleway between Cranbrook Common and Hillywood House, to the north-west of Sissinghurst (photograph 8). Views consist of a rural and well wooded landscape. Both Sissinghurst and the associated sites considered within this study were screened from view.

#### *Description of the proposals*

4.5.16 The proposals for each draft allocation associated with Sissinghurst are as follows:

Allocation site / draft policy	Draft allocation proposal
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AL/CRS12	Residential development between 5-10 dwellings
AL/CRS13	Residential development of approximately 40 dwellings.
AL/CRS14	Residential development of approximately 20 dwellings and a replacement community hall.
AL/CRS15	Residential development between 15-20 dwellings and two gypsy pitches.
AL/CRS16	Residential development between 20-25 dwellings
AL/CRS17	Safeguarded land for future school expansion

Further details of the proposals are provided within the draft local plan under each policy heading.

*Predicted effects of the proposed allocation on the setting of the AONB*

- 4.5.17 At this stage the locations of proposed dwellings are unknown and this assessment is considered at a strategic level. This study will identify sites and locations within the sites that may affect the setting of the AONB and will put forward suggestions of appropriate measures that could mitigate for these predicted effects (see figure S3). These mitigation measures are solely concerned with the protection of the setting of the AONB and do not address any other landscape, visual or coalescence issues that may arise as a consequence of development within the draft allocations.
- 4.5.18 Sites CRS12, CRS15, CRS16 and CRS17 are all physically and visually separated from the AONB. The development proposed within the draft allocations would not harm the perceived character of the AONB or views into or out of the AONB. It is unlikely that development within the sites would harm the setting of the AONB, providing that it conforms to the draft allocation policies and other relevant guidance documents.
- 4.5.19 Sites CRS 13 and CRS 14 abut the AONB boundary. Both sites are part of the village landscape and are currently screened from viewpoint locations within the AONB. The removal of trees or vegetation on the southern boundaries of these sites, combined with new development on the southern parts of the sites, could lead to adverse effects on the setting to the AONB. The A262 has a well treed and sylvan character between Wilsley Pound and Mill Lane (the AONB boundary). The southern boundary of site CRS13 is formed by a tree belt and hedgerow that

contributes to this character. Replacement of this treed frontage would affect the character of the road. If the tree belt is retained and enhanced, the proposed allocation site is unlikely to adversely affect the setting to the AONB.

- 4.5.20 The southern hedgerow boundary of site CRS14 separates the site from a public right of way and the edge of the AONB. The site itself is already influenced by existing settlement and there are views of dwellings from stretches of the footpath to the south. The change in character within the site is unlikely to harm the character of the High Weald AONB, however any removal of the southern boundary vegetation or development along the southern edge of the site, may adversely affect the character and visual amenity of the adjacent AONB. It is recommended that the hedgerow is retained and enhanced with additional tree planting and that the proposed housing is set back from the southern boundary, such that the views of the proposals from the footpath to the south are minimised.
- 4.5.21 These findings are consistent with the Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells (Ref 5), which considered the land surrounding Sissinghurst in association with the landscape sensitivity of Cranbrook. The sensitivity study considers large tracts of land, with a focus on large scale development, whereas the sites considered as part of this study are relatively small and discrete. The study also focuses on wider landscape and visual issues, whereas this report is specific to the potential effects on the setting to the AONB.
- 4.5.22 Design measures that would reduce the predicted effects on the setting to the AONB include:
- Retain and enhance the southern boundary trees and vegetation within sites CRS13 and CRS14.
  - Promote a landscape led approach to the development proposals, which create a structure to contain the allocation sites that is consistent with the character of the adjacent High Weald. Any design or layout proposals should adhere to relevant guidance including the National Design Guide and should take inspiration from the High Weald Design Guide and Management Plan.
  - Give careful consideration to the setting of Conservation Areas, listed buildings and registered Parks and Gardens, which lie adjacent to the AONB and are protected in their own right.

4.5.23 If these measures are undertaken it is possible that the proposed draft allocations within Sissinghurst could be achieved without significant harm to the setting of the High Weald AONB.

## 5 Potential cumulative effects on the High Weald AONB

5.1 The potential site allocations assessed within this study are well spaced along the northern edge of the High Weald AONB. The desk study and field work has identified no locations within the AONB where the proposals at more than one settlement would be experienced. Paddock Wood and Tudeley Garden village are the closest study sites and the largest proposed developments, however the combination of landform and extensive tree cover mean that the proposals associated with these two settlements would not have cumulative effects on the setting to the AONB.

## 6 Summary and Conclusions

6.1 The majority of sites considered within this study were assessed as having limited potential to significantly affect the setting to the High Weald AONB. Of the draft allocations assessed, the following have the potential to adversely affect the setting to the AONB – if no mitigation is put forward:

- Paddock Wood - sites PW1\_7-11 (located to the east of Paddock Wood);
- Tudeley Garden Village – development on the high ground to the south of the site, adjacent to the B2017;
- Horsmonden – site HO3 in distant views from Goudhurst; and
- Sissinghurst – poor design and loss of existing features at sites CRS13 and CRS14 could affect the landscape character and visual amenity associated with the adjacent edge of the AONB.

6.2 The measures set out within the relevant draft policies for each site, along with additional measures put forward within this report would address the concerns raised regarding each of these sites, such that there would be no long term significant adverse effects on setting to the High Weald AONB in the long term.

- 6.3 The setting to the AONB should be considered in further detail by site promoters as the design proposals for each site evolve. This report includes recommendations for additional testing of future development designs, through the production of appropriate visualisations, for draft allocations sites AL/PW 1 (in particular) and AL/HO3 in order to provide development proposals that respond positively to views out of the AONB.
- 6.3 One site: the draft allocation at Benenden Hospital, has the potential to improve the setting to the AONB through a more sensitive redevelopment of existing buildings.

## REFERENCES

1. Department for Communities and Local Government (launched March 2014 and subsequent updates), '*National Planning Practice Guidance*'.
2. Tunbridge Wells Borough Council (20 September to 1 November 2019), '*The Tunbridge Wells Borough Draft Local Plan, Regulation 18 Consultation Draft*'.
3. Tunbridge Wells Borough Council (June 2010), '*Tunbridge Wells Borough Local Development Framework, Core Strategy Development Plan Document*'.
4. The Landscape Institute with the Institute of Environmental Management and Assessment, (2013), "*Guidelines for Landscape and Visual Impact Assessment*" (third edition).
5. LUC on behalf of Tunbridge Wells Borough Council (July 2018), '*Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells*'.
6. LUC on behalf of CPRE, '*England's Light Pollution and Dark Skies map*', website: <https://www.nightblight.cpre.org.uk/maps/>