



Planning Department
Tunbridge Wells Borough Council
Mount Pleasant Road
Royal Tunbridge Wells
Kent
TN1 1RS

Our ref: JB/33072

26 February 2024

Dear Sir/Madam,

COMMENTS ON THE COUNCIL'S RESPONSE TO THE INSPECTOR'S INITIAL FINDINGS LETTER ON THE EXAMINATION OF THE BOROUGH LOCAL PLAN

I write on behalf of my client, Caenwood Estates Ltd, to provide comments on Tunbridge Wells Borough Council's response to the Inspector's Initial Findings on the Local Plan Examination. The Council is seeking comments on their response until Monday 26 February 2024.

Background

Caenwood Estates has been promoting the land at Caenwood Farm and Whitegates Farm located on the western edge of Royal Tunbridge Wells, close to Southborough town centre throughout the current Local Plan process.

Part of the site has been included in the Submission Draft Local Plan as a new housing allocation under Policy AL/RTW 5. The site is referred to as "land to the south of Speldhurst Road and west of Reynolds Lane at Caenwood Farm, Speldhurst Road" and the allocation envisages the provision of 100 new dwellings, of which 40% will be affordable and a minimum of 5% delivered as serviced self build and custom housebuilding plots. The policy expects access into the site to be provided from Speldhurst Road to the north, with enhanced footpath links, public open space and extensive green infrastructure. It is also expected that the site would be designed as a Low Traffic Neighbourhood.

Our client is actively supportive of the proposed policy for a sensitively design urban extension in this location and is pleased to see that the merits of the site have been acknowledged, without any concerns raised by the Inspector to date, in light of the need to release select areas of the Green Belt to deliver the objectives of the Local Plan.

Changes to the Local Plan Strategy

Tunbridge Wells Borough Council has proposed the following changes to the Local Plan strategy in response to the Inspector's Initial Findings letter published in November 2022. Those changes can be summarised as follows:



- Proposed removal of the strategic policy STR/SS 3: The Strategy for Tudeley Village from the Local Plan;
- Revision of the strategic policy STR/SS 1: The Strategy for Paddock Wood and land at east Capel, including a reduction in the amount of residential housing growth by approximately 1,000 dwellings, with all housing being on Flood Zone 1 and employment land on Flood Zone 2, along with a reduction of employment provision, and reconfigured sport and recreation provision and secondary school education provision (as set out at Appendix D of the Development Strategy Topic Paper Addendum);
- At Hawkhurst it is proposed to revise site allocation policy number AL/HA 5: Land to the north of Birchfield Grove, to include housing, and land safeguarded for primary school expansion (in accordance with a planning committee resolution on application reference 22/02664/HYBRID);
- Also at Hawkhurst, the Council proposes the removal of site allocation policy number AL/HA 8: Limes Grove (March's Field) from the Local Plan. This site was proposed for employment use in the Submission Local Plan; and
- Progression of a 10 year housing land supply position including the requirement for an immediate review of the plan.

We agree that it is important that the Council gets a Local Plan in place as soon as possible to ensure that Tunbridge Wells Borough Council is able to meet its housing needs over the next ten years. Caenwood Estates therefore **supports** the proposed changes to the Local Plan strategy, and considers the resulting proposed Local Plan to be sound.

Additional land at Caenwood Farm

Whilst our client fully supports the proposed approach, if the Inspector disagrees and considers that additional sites need to be allocated in the current Local Plan in order for it to be sound, the Council will need to further reconsider alternative sites.

In that scenario, we consider that additional land should be considered for allocation at Caenwood Farm for the reasons set out below.

The entire 150-acre Caenwood Farm site has long since been promoted as a natural extension to Tunbridge Wells. The 2009 SHELAA recognised that part of the site was suitable for development, as set out at **Annex 1** and extracted below. The remainder of the Caenwood Farm was excluded from further consideration in that SHELAA by virtue of the criteria that applied at the time, which looked at land immediately adjacent to the built-up area only.

The 2009 SHELAA noted that *"this part of the site is considered to be more appropriate for limited development, particularly in the northern and north eastern part of the site which is adjacent to existing residential development and due to the topography and landscape [which] is well screened and could be suitable for residential development."*

The site was in the Green Belt as it is currently and there have been no changes to the site which would have altered these conclusions.



Various scales of residential-led mixed-use development across the wider site have since been promoted as a natural extension to Tunbridge Wells. In particular, it has been promoted through the Regulation 18 and 19 stage consultations on the emerging Local Plan, with the submissions accompanied by an illustrative masterplan package which was provided to demonstrate how the site could be developed for residential use and extensive open space provision through the creation of a new community park.

The following plans were submitted and are provided at **Annex 2**:

- DHA/14948/03: A proposed Land Use Plan, showing the two main areas (residential and park area) within the site, together with the wider land ownership.
- DHA/14948/04A: An illustrative Concept Plan showing the whole of the Caenwood Farm site in the context with its surroundings.
- DHA/14948/04B: A further version of the Illustrative Concept Plan focusing on the proposed residential parcel.
- DHA/14948/06: A Local Connections Plan, showing how the proposed routes through the site will connect into the wider local footpath network.

As per the draft allocation, the north-eastern part of the site was proposed for residential development, but we would request that consideration is given to the extension of the residential area further west so that the new development continues to abut the existing

residential area to the north and terminates before the landscape becomes more open in the fields beyond, as shown below.



It is noted that the Green Belt Stage 3 Addendum report provided as part of the revised evidence base shows the proposed extension to the allocation as falling within an area with 'High' landscape sensitivity, as shown at **Annex 3**. However, this does not accurately reflect the conditions of the landscape on the ground. The Landscape and Visual Impact Assessment enclosed at **Annex 4** demonstrates how the extended residential area (see photos 1, 2 and 5) would fall within the boundaries of well-established boundary vegetation which would screen future development from the wider landscape (see photo 6), as shown in the extracts provided overleaf. As such, it is considered that the proposed extension to the draft allocation has a Low-Moderate landscape sensitivity and the impact of development would be comparable to the existing draft allocation and other proposed sites as acknowledged in paragraph 2.25 of the Council's response.

Further, for similar reasons, we would consider the level of harm to the Green Belt to be comparable to draft allocation – low to moderate – and we would request that the Council reconsiders their assessment of the site in the revised SHELAA in reflection of the further details provided below. This would be consistent with the conclusions made for this part of the site in the 2009 SHELAA referred to previously.



With this in mind, the illustrative masterplan shows that the extended area could deliver around 280 units at a density of 35 dwellings per hectare, resulting in an increase of 180 new homes compared to the existing draft allocation. This would result in a meaningful increase in the supply of housing land within the emerging Local Plan prior to the proposed review within 5 years. The layout retains various areas of woodland within the site, some of which are protected as ancient woodland, with a minimum 20m buffer provided.

In line with the draft Policy AL/RTW 5, the residential area would be accessed from two priority junctions from Speldhurst Road, the detailed designs of which are included at Appendix A of the submitted Transport Technical Note contained at **Annex 5**. There would also be emergency, pedestrian and cycle access to Reynolds Lane, providing connections to the local secondary schools, bus stops and other facilities on St John's Road¹. New pockets of public open space are provided within the residential zone to provide play space and allotments² as required by the existing draft policy.

Paths would also link to a proposed 21 hectare country park ('Caenwood Community Park')³, which would cover an area of land running through the centre of the Caenwood

¹ Point 3 on plan DHA/14948/04A

² Point 6 on plan DHA/14948/04A

³ Point 7 on plan DHA/14948/04A

Farm site. This would provide a significant area of amenity for existing and new residents, as well as those working at Salomons. The park provides a buffer both to the adjacent National Landscape and also to the heritage assets on the Salomons Estate, thereby continuing to protect its rural setting.

An existing public right of way runs across the development parcel in the north eastern part of the site⁴. This public right of way will be retained and the layout designed around it. It currently links to the east into a further footpath on the eastern side of Reynolds Lane providing direct pedestrian access to St Gregory's Catholic School, Tunbridge Wells Grammar School for Boys, Tunbridge Wells Sports Centre and the St John's Road corridor⁵.

As set out in further detail below, the park would provide a significant compensatory improvement to help justify the removal of the residential parcel from the Green Belt. Other than the short section of footpath in the north-east corner, the site is not currently accessible to the public. The proposed park will open up a larger new area of public open space, and more importantly, make a significant contribution to the local footpath network.

In particular, as shown on plans DHA/14948/04A and DHA/14948/06, footpaths would be created within the site which will link into the existing public rights of way network to the south of the site⁶ and also to the west⁷. Paths are also proposed to the south east of the site in order to provide a connection through to the existing footway network through St John's Meadow, which in turn leads through to St John's Recreation Ground, and on towards the Tunbridge Wells Grammar School for Girls, The Skinner's School and the A26 corridor in general, as well as the large residential areas to the east of the A26, and to the south of Culverden Down⁸. This would be an attractive and no doubt popular walking route in daylight hours.

Connections could also be created to link in with the existing access to the Salomons Estate itself, whilst the residential areas in Southborough could also be accessed via the proposed residential development and footpath WB1.

Overall, as shown on drawing reference DHA/14948/04A, the proposed extension to the draft site allocation and the extensive open space provision proposed would be consistent with the existing landscape characteristics of the site and both elements of the indicative proposal would sit comfortably within the existing and emerging context.

Compensatory improvements to the Green Belt

NPPF paragraph 147 states that:

"... Where it has been concluded that it is necessary to release Green Belt land for development, plans should... set out ways in which the impact

⁴ WB1 on plan DHA/14948/06

⁵ WB2 on plan DHA/14948/06

⁶ WB3, WB5 and WT73 on plan DHA/14948/06

⁷ WT72 on plan DHA/14948/06

⁸ WB4 and WB5 on plan DHA/14948/06



of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”

National planning practice guidance provides further advice on the types of improvements which might be considered as offering some compensation to the loss of the Green Belt. Specifically, it notes that such improvements could include:

- New or enhanced green infrastructure (e.g. parks, playing fields, open space, woodland, allotments, sustainable drainage features, etc.);
- Woodland planting;
- Landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposed development);
- Improvements to biodiversity, habitat connectivity and natural capital;
- New or enhanced walking or cycling routes; and
- Improved access to new, enhanced or existing recreational and playing field provision.

The proposed park would represent a significant environmental improvement which could incorporate several of the improvements suggested in planning practice guidance.

As noted above, there is currently little public access to the site. Creating a public park, and connecting it to a large variety of existing walking routes, would make it easily accessible for dog walkers and general recreational use for residents in a large part of Tunbridge Wells and Southborough.

Other Planning Considerations

Future Phases

The wider Caenwood Farm site was originally submitted in the 2016 Call for Sites as having scope to accommodate up to 1,000 units in total. Although the current proposals are for a smaller development on part of the site closest to the existing urban boundary, there remains scope in the future to expand development onto other parts of the site subject to landscape and other considerations.

Deliverability

The proposed development remains substantially in a single ownership and so is quickly deliverable. As demonstrated above, it will not lead to significant transport impacts, and so it is not reliant on major infrastructure upgrades, in contrast to larger strategic development sites like that previously proposed at Tudeley.



Indeed, initial studies undertaken and submitted as part of the Call for Sites submission for Caenwood Farm have also shown that, through good design and phasing, there are no in principle constraints to development on landscape, archaeology, flood risk, ecology, heritage or air quality grounds.

Transport

The owners recognise that there is a perception of highway capacity issues locally and have previously undertaken surveys to provide evidence that the development can be accommodated. It is noted in this respect that Automatic Number Plate Recognition (ANPR) surveys carried out for Kent County Council (KCC) suggest that the majority of traffic travelling on the A26 at peak times is destined for, or originates from within, the Tunbridge Wells urban area.

The potential transport impacts of a development at Caenwood Farm have been assessed in a Transport Technical Note which accompanies this submission. This assessment shows that the A26 London Road/Yew Tree Road/Speldhurst Road junction would continue to operate within its design capacity during both peak hours with the development in place, both at present and by the end of the emerging local plan period. Indeed, the assessment is extremely robust in that it has assumed a higher level of development than is actually proposed.

The site is adjacent to the town's best served public transport corridor linking Southborough with Tunbridge Wells and Tonbridge, with the nearest bus stop only 130 metres away. High Brooms railway station is only a short walk to the east and offers frequent services to London, Tonbridge, Tunbridge Wells and Hastings. North Farm Industrial Estate is also easily accessible from this area. School transport services are also already focused on this area.

The area has already benefited from highways improvements funded by the Local Growth Fund, the aim of which is to finance infrastructure works that would lead to further growth. The nearby A26 junction with Speldhurst Road and Yew Tree Road has been upgraded by KCC to cater for growth arising from the new Tunbridge Wells Local Plan. In order to get best value from these works, the Council should be investigating opportunities for growth in this area.

Furthermore, the dualling of the A21 between Tonbridge and Tunbridge Wells has reduced the pressure on the A26 London Road. The South East Local Enterprise Partnership has also contributed £1,039m to the recently-completed A26 Cycle Route Phase 1 scheme between Tunbridge Wells and Southborough, which has further enhanced sustainable transport options on this corridor. More recently, Reynolds Lane has been turned into a walking and cycling route.

As a result, the Council can have confidence that allocating this land at Caenwood Farm for residential development would not have a significant adverse impact on the local road network. Indeed it would represent a suitable and sustainable location for development in highways and transportation terms.



Landscape and Visual Effects

As noted above, unlike wider areas of land locally, the site is not within the High Weald National Landscape which covers a large proportion of the borough. The proposed park will provide a buffer to the National Landscape boundary further west. Please refer to the submitted Landscape and Visual Impact Assessment for a detailed assessment in reflection of the summarises provided above.

Flood Risk

There are no flood risk issues associated with Caenwood Farm. The proposed developable area is wholly within Flood Zone 1, which has the lowest risk of flooding, as confirmed within a Flood Risk Assessment prepared for the site by Phoenix Adam Consultants and submitted previously in support of the full site.

Ecology

A Preliminary Ecological Appraisal of the site prepared by Peak Ecology in July 2016 identified the presence of Ancient Woodland within the site which has been factored into the indicative proposals presented previously. The report concludes that there are no constraints that would prevent the development of the site.

Overall, the proposed extension to the draft allocation remains contiguous with the settlement boundary and continues to be within easy walking distance of a wide range of services and amenities including places of work, shops, recreational facilities, High Brooms Station and an extensive range of community and education facilities including the main concentration of secondary school provision in the town. This is in contrast to the concerns raised by the Inspector in respect of the proposed garden village at Tudeley.

I therefore hope that the extended part of the site will be considered favourably ahead of the adoption of the Local Plan and we would be welcome to having further discussions with officers to discuss the potential masterplan of the site in its entirety.

Yours sincerely,



Jonathan Buckwell
Director



- Annex 1 - 2009 SHELAA Extract
- Annex 2 - Indicative Plans
- Annex 3 - Green Belt Stage 3 Addendum Extract
- Annex 4 - Landscape and Visual Impact Assessment
- Annex 5 - Transport Technical Note



Annex 1 - 2009 SHELAA Extract

Map 98 Site 272: Land at Caenwood Farm (northern section), Reynolds Lane, Royal Tunbridge Wells

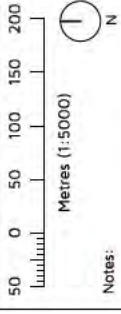


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Ref	Building/Site Name	Road Name	Settlement	Postcode
272	Land at Caenwood Farm (northern section)	Reynolds Lane	Royal Tunbridge Wells	
Site Description				
Site lies immediately to the south of Speldhurst Road opposite existing residential development. Site abuts Reynolds Lane to the east and a track to the west. Parts of the site are fairly well enclosed within small field patterns and benefit from extensive woodland screening. The site is currently in agricultural use.				
Suitability				
This is part of a larger site, but it has been split into two sites due to the nature of the site as a whole. Landscape has been degraded through surplus agricultural clutter. This part of the site is considered to be more appropriate for limited development, particularly the northern and north eastern part of the site which is adjacent to existing residential development and due to the topography and landscape is well screened and could be suitable for residential development. However, there are a number of constraints to development. The site lies almost entirely within the Green Belt and Special Landscape Area (SLA). A small part of the site is ancient woodland, partly in flood zone 3b and landfill quarry. Despite these constraints, it is considered that the site would be suitable for residential development. Site is subject to Level 2 constraints.				
Availability				
In single ownership and able to be commenced within 5 years	<input checked="" type="checkbox"/> Commenced by 31 Mar 2013	<input type="checkbox"/> Commenced by 31 Mar 2009	Time to develop 4	
	<input type="checkbox"/> Commenced 1 Apr 13 - 31 Mar 18	<input type="checkbox"/> Commenced by 31 Mar 2010	Phasing	
	<input type="checkbox"/> Commenced 1 Apr 18 - 31 Mar 23	<input type="checkbox"/> Commenced by 31 Mar 2011		
	<input type="checkbox"/> Commenced after 1 Apr 2023	<input type="checkbox"/> Commenced by 31 Mar 2012		
	<input type="checkbox"/> Availability Assumed	<input checked="" type="checkbox"/> Commenced by 31 Mar 2013		
Achievability				
Submitted through LDF process so considered achievable				
		SHLAA Housing (Min) 0	SHLAA Flats (Min) 0	Existing Dwellings
		SHLAA Housing (Max) 0	SHLAA Flats (Max) 0	Housing Potential 279
Summary				
Consider in conjunction with Site 273 as the original submitted site was split. The site is a very large site on the edge of the settlement. Only the northern/north eastern part of the site is considered suitable for development and therefore the developable area has been reduced to 12.03 hectares. However within this developable area, there are areas of mature woodland and substantial mature trees which should be retained for landscaping/screening purposes. The developable area of the site has been reduced by approximately 20% to accommodate landscaping, etc. The density of surrounding residential development is approximately 29 dwellings per hectare. Applying a similar density would result in the site being able to accommodate approximately 279 dwellings.				

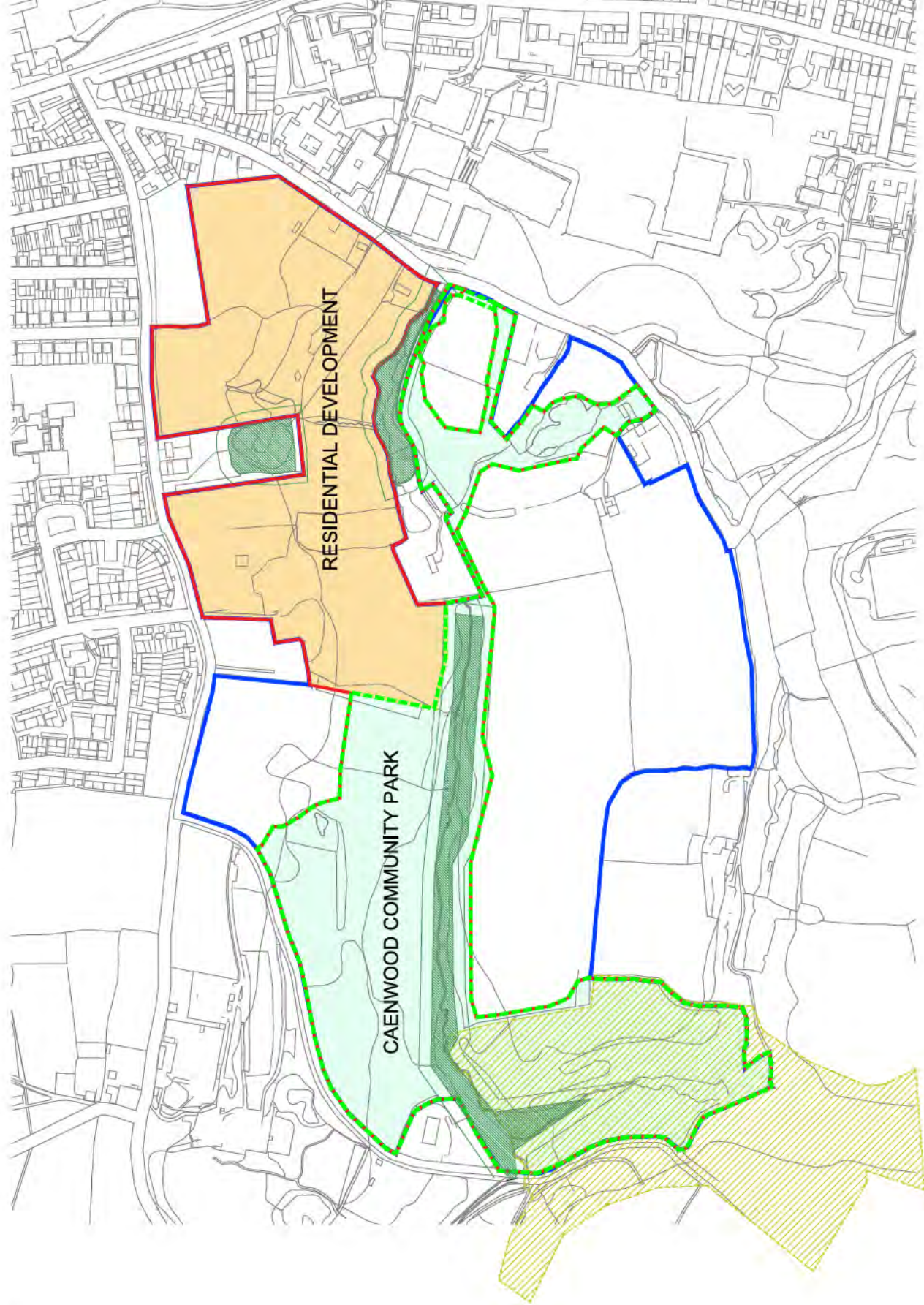


Annex 2 – Indicative Plans



Notes:

- Red Line Area: 37.12 Ha
- Other land within Caenwood Estates Ownership: 22.91 ha
- Residential: 15.7 Ha
- Country Park: 21.4 Ha
- Ancient Woodland (+15m buffer)
- Policy EN15 Local Nature Reserve



Rev: Reason: Date:

Client: CAENWOOD ESTATES

Project: LAND AT CAENWOOD FARM SOUTHBOROUGH

Title: LAND USE PLAN

Drawing No: DHA/14948/03

Scale: 1:5000

Date: OCT 2020



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 CAD Reference: DHA_top@Caenwood Farm_LW01

Land at Caenwood Farm



6. New areas of Public Open Space including play space and allotments to create hubs.
7. Pedestrian links to proposed Caenwood Community Park.
8. Indicative woodland trails including activity trim trail.
9. Pedestrian links to Hurst Wood/TWells Town Centre.
10. Pedestrian links to Saiomons Estate, Wealdway Walk and Southborough.
11. Pedestrian links to St John's Meadow / Recreation Ground and T.Wells beyond.
12. Proposed Caenwood Community Park.

Concept
1:5000 @ A3



Red Line Area: 37.12 ha
 Proposed Development Zone: 15.7 ha
 Residential Area: 8 ha approx @ 35 - 280 units

Vehicle Access via Speldhurst Rd
 Public Footpaths
 Proposed Caenwood Community Park: 21.4 ha

- Woodland Trails
- Trim Trail
- View points
- Cycling
- Existing Blue Infrastructure
- Indicative attenuation
- Picnic Site
- Fishing

1. Primary Access Loop.
2. Public Footpath WB1 to be incorporated with natural surveillance enhanced for pupils.
3. Pedestrian and Emergency access only to Reynolds Lane with onward pedestrian access via Public Footpath WB2 to Town Centre.
4. High quality residential character areas with woodland backdrop.
5. Woodland retained and appropriate development buffers respected.

Client: CAENWOOD ESTATES
 Project: LAND AT CAENWOOD FARM SOUTHBOROUGH
 Title: ILLUSTRATIVE CONCEPT Residential Development & Caenwood Park
 Drawing No.: DHA/14948/04A
 Scale: 1:5000
 Date: OCT 2020

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 CAD Reference: IHA_14948_Caenwood Farm_C1401 A3

Land at Caenwood Farm



Notes:

- Red Line Area: 37.12 ha
- Development Zone: 15.7 ha
- Residential Area: 8 ha approx @ 35 - 280 units
- A Vehicle Access via Speldhurst Rd
- Public Footpaths
- Proposed Caenwood Community Park: 21.4 ha
- Woodland Trails
- Proposed Trim Trail
- A Picnic Area
- B Cycling

1. Primary Access Loop.
2. Public Footpath WB1 to be incorporated with natural surveillance enhanced for pupils walking to school.
3. Pedestrian and Emergency access only to Reynolds Lane with onward pedestrian access via Public Footpath WB2 to TWells Town Centre.
4. High quality residential character areas with woodland backdrop.
5. Woodland retained and appropriate development buffers respected.
6. New areas of Public Open Space including play space and allotments to create central hubs.

Client: CAENWOOD ESTATES
 Project: LAND AT CAENWOOD FARM SOUTHBOROUGH
 Title: CONCEPT Residential Development
 Drawing No: DHA/14948/04B
 Scale: 1:2500
 Date: OCT 2020

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7. Pedestrian connections to proposed Caenwood Community Park & Salomons Estate.
8. Indicative woodland trails including trim trail.
9. Pedestrian links to St John's Recreation Ground and T.Wells beyond.
10. Potential access to neighbouring site.
11. Frontage to Speldhurst Road.
12. Proposed Caenwood Community Park.

Concept
 1:2500 @ A3

- Residential Zone - 15.7 ha
- Caenwood Park - 21.4 ha
- Public Footpaths
- Existing unadopted footpath
- Proposed Woodland Walks
- Proposed Trim Trial

1. Public Footpath 0308/WB1/1 connecting to Reynolds Lane (schools) and onward to A26 via Public Footpath 0308/WB2/1.
2. Public Footpath 0308/WB4/1 connecting proposed Community Park with Reynolds Lane and St John's.
3. Public Footpath 0308/WB5/1 connecting Community Park to Hurst Wood, Denny Bottom & TWells centre.
4. Public Footpath(s) 0308/WT71/72 connecting Community Park to Wealdway Walk & Southborough.
5. Vehicle and Pedestrian access to Speldhurst Road and A26 beyond.
6. Pedestrian connections from proposed Community Park to St John's Meadow and Recreation Ground.

Rev: Reason Date
 Client: CAENWOOD ESTATES
 Project: LAND AT CAENWOOD FARM SOUTHBOROUGH
 Title: LOCAL CONNECTIONS

Drawing No: Ref: Scale: Date
 DHA/14948/06 1:5000 NTS

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Local Connections
 NTS

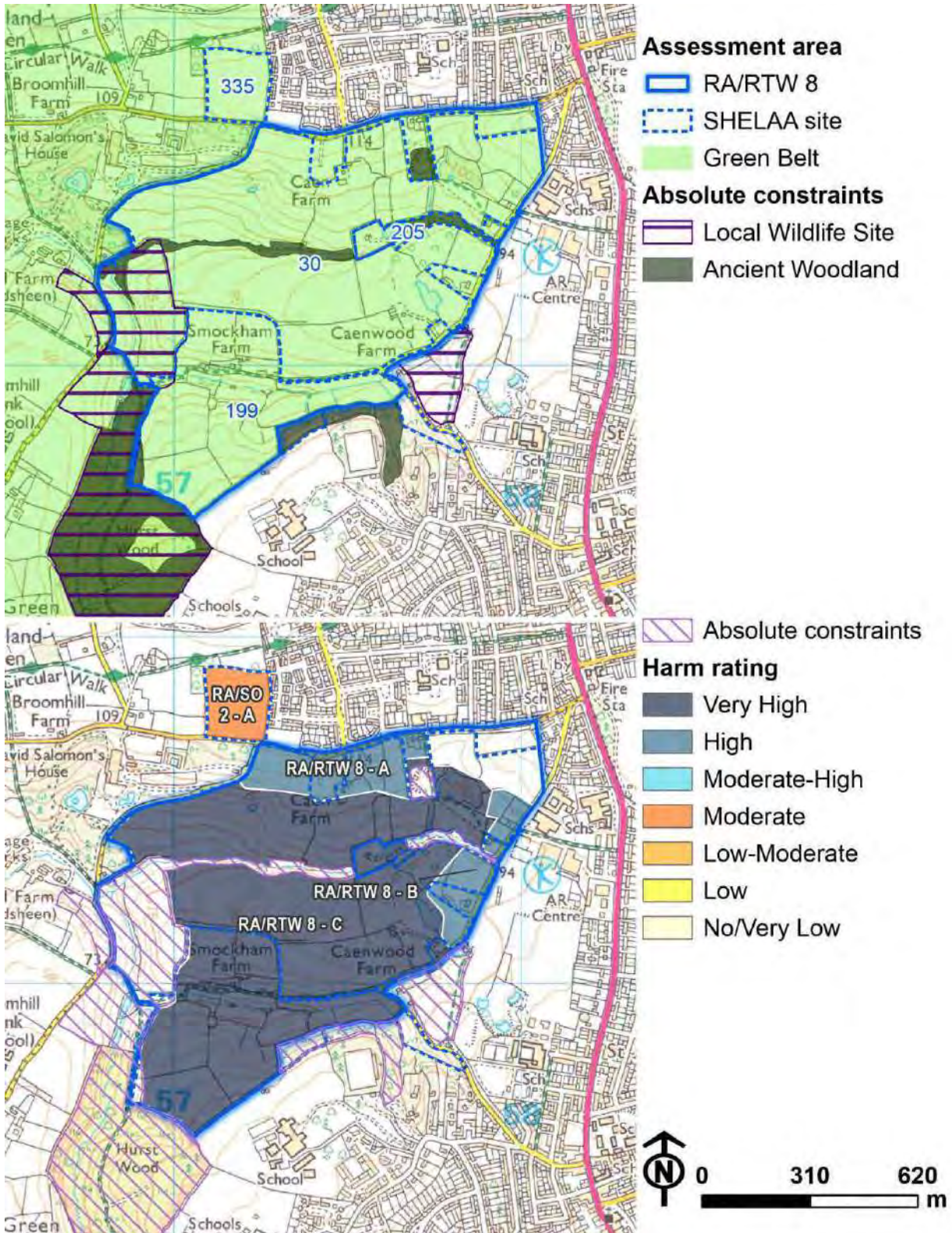


Royal
 Tunbridge
 Wells



Annex 3 – Green Belt Stage 3 Addendum Extract

RA/RTW 8





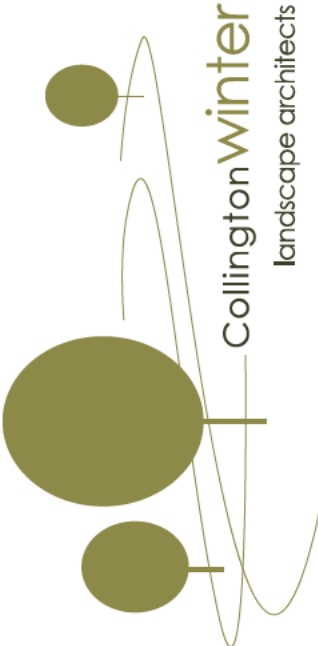
Annex 4 – Landscape and Visual Impact Assessment

Caenwood Estate

Tunbridge Wells, Kent

Landscape & Visual Assessment

July 2016



Report Control Sheet

Project Name: Caenwood Estate
Project Reference: CW026
Report Title: Landscape & Visual Assessment
Report Reference: CW026-RPT-001



	Name	Signature	Date
Prepared By	Jane Winter	[Redacted Signature]	18/07/2016
Reviewed By	Olivia Winter	[Redacted Signature]	18/07/2016
Approved By	Jane Winter	[Redacted Signature]	19/07/2016
For and on behalf of Collington Winter Ltd			

Revision	Date	Description	Prepared	Reviewed	Approved
/	19/07/2016	Report sent to the client for comment	JW	OW	JW

Collington Winter Ltd disclaims any responsibility to the Caenwood Estate and others in respect of any matters outside the scope of this report. This report has been prepared with reasonable skill, care and diligence within the terms of the Contract with the Caenwood Estate.

This report is confidential to the Caenwood Estate and Collington Winter Ltd accepts no responsibility of whatsoever nature to third parties to whom this report or any part thereof is made known. Any such party relies upon the report at their own risk.

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Section 1

1.0 Introduction

1.1 Scope & Purpose

Collington Winter Ltd was commissioned by the Caenwood Estate to prepare a Landscape and Visual Assessment (LVA) to support the promotion of a parcel of land at Caenwood & Whitegates, Reynolds Lane, as suitable for housing and economic development, as a part of the Tunbridge Wells Borough Local Plan - Strategic Housing and Economic Land Availability Assessment 'Call for Sites'.

This report aims to:

- Review the **landscape planning context** for the area;
- Consider the **landscape character** and **visual relationships** of the site within the wider landscape setting and the impact of the proposed development upon the landscape character;
- Assess the **visibility** of the sites from key public receptors and identify any potential visual impacts; and
- Establish **mitigation of landscape and visual effects**, to aid the future development of the site.

A desktop review of landscape character and relevant planning policy are combined with a site assessment of landscape and visual issues. The field assessment was carried out by a Chartered Landscape Architect on the 28th to the 30th of July 2016.

The LVA considers the potential effects of the potential development of the site for residential housing and economic growth upon:

- Individual landscape features and elements;
- Landscape character; and
- Visual amenity and the people who view the landscape.

1.2 Location

The site is located off between Reynolds Lane, Speldhurst Road and Broomhill Road, approximately two miles to the north of Tunbridge Wells, in the County of Kent. See Figure 1.1: Location.

1.3 Assessment Methodology

This assessment has been conducted in accordance with the principles set out in:

- 'Guidelines for Landscape and Visual Impact Assessment', Landscape Institute (LI) & Institute of Environmental Management and Awareness (IEMA), Third Edition, 2013; and
- 'Landscape Character Assessment – Guidance for England and Scotland', Scottish Natural Heritage and The Countryside Agency, 2002.

This LVA would be considered as only a 'baseline study' within the context of the guidelines and does not amount to a full Environmental Impact Assessment of landscape issues. The LVA identifies the existing landscape setting and visual context of the site. LVA's are important components of the overall landscape, planning and design process, when seeking to provide the best 'environmental fit' for any given development.

The landscape and visual baseline survey was undertaken in July, in dry and clear weather conditions, when the trees were in leaf. Good practice guidelines recommend that visual assessments are undertaken during the winter-time, when trees are bare, as this is representative of the worst-case scenario in

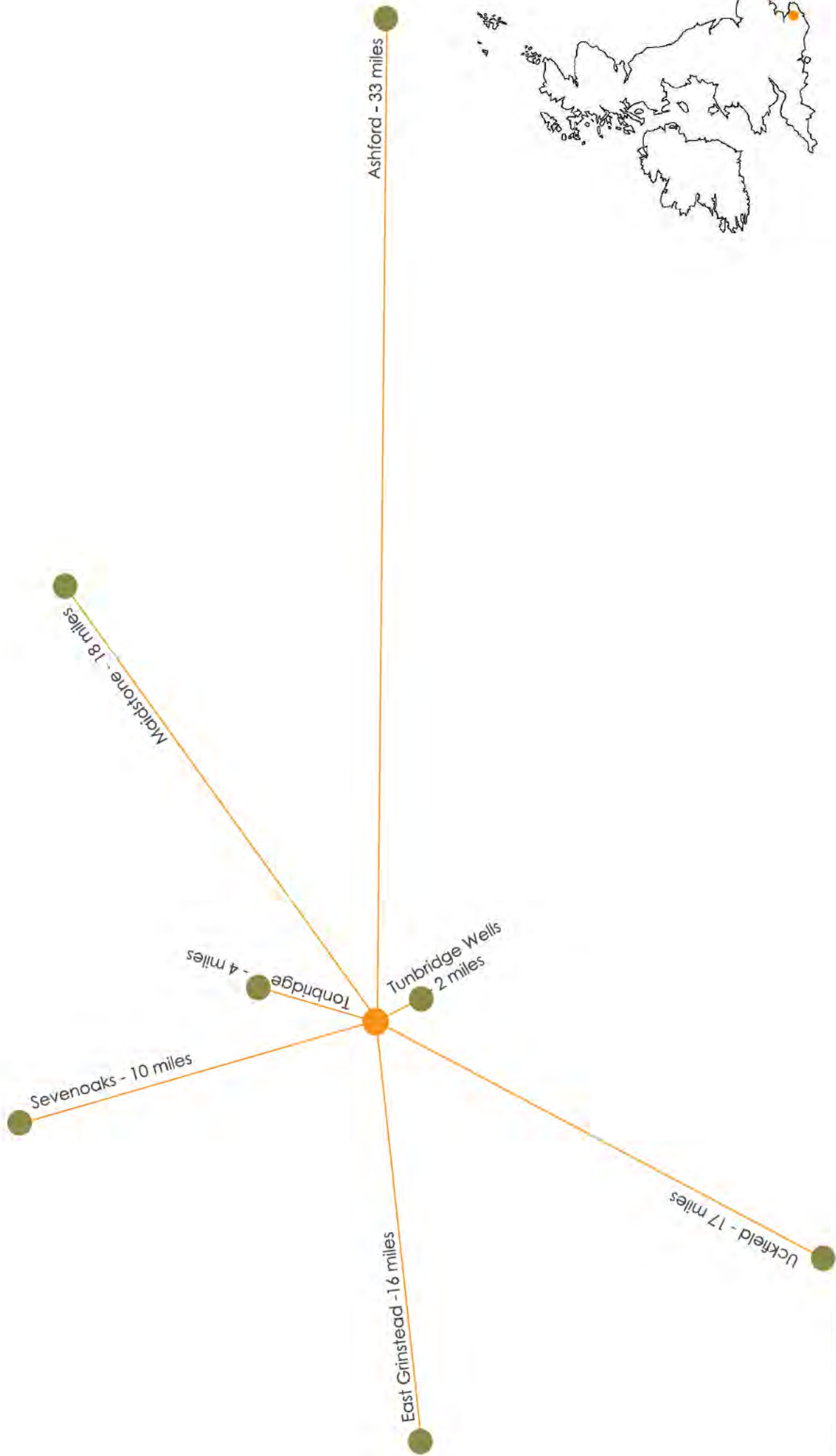


Figure 1.1: Location

terms of visibility. Notwithstanding this, the visual assessment recorded in this LVA remains fundamentally sound as a basis for planning decisions. There are two components to landscape and visual assessment, which were considered as the site assessment was carried out:

- Assessment of **landscape effects**; assessing effects on the landscape as a resource in its own right.
- Assessment of **visual effects**; assessing effects on specific views and on the general visual amenity experienced by people.

The landscape character of the site and its surroundings and the visual envelope of the site were identified through a review of baseline data, which was subsequently verified on site. The visual envelope (i.e the extent to which the site is visible from the surrounding landscape) has been verified on the ground, and provides an understanding of the area in which the proposed development may be visible, the people who may experience views, and the nature of views.

This study does not amount to a full Landscape and Visual Impact Assessment and therefore, this report does not provide an assessment of the likely effects of the development of the site for residential houses.

1.4 Extent of the Study Area

The size of the study area for this LVA has been determined by the size of the site and the likely scale of development. The setting of any new development, to the north of Tunbridge Wells and its likely impacts upon the surrounding landscape and visual receptors within the local area have been considered from within a 4km radius from the site.

Following a desktop review of relevant documentation, to assess baseline conditions and likely significant effects of the development upon landscape and visual receptors, a Zone of Theoretical Visibility (ZTV) map was produced, to illustrate the potential visibility of the development, based upon a bare earth digital assessment of terrain. The ZTV illustrates location within the potential zone of visibility, where views of the development are likely to occur. Following this initial desktop review, it was concluded that, due to the rolling topography and woodland character of the surrounding landscape, any visual effects are likely to be concentrated within a radius of 4km to the south.

As the quantum of development is, as yet, unknown, an average build height of 8m has been used to calculate the ZTV map and as a guide for assessing likely visual impacts of the development of the site upon local receptors.

2.0 Landscape Planning Policy Context

The site is situated within the Tunbridge Wells Borough Council administrative boundary.

2.1 National Planning Policy

The National Planning Policy Framework was published on the 27th March 2012 and provides the planning policy framework, with emphasis on the local plan, produced by local planning authorities. The National Planning Policy Framework aims to guarantee strong protection for the natural and historic environment. The National Planning Policy Framework establishes economic, social and environmental planning policy. There is a **presumption in favour of sustainable development** which should be viewed as “a golden thread running through both *plan-making and decision-taking*” (National Planning Policy Framework, 2012).

The National Planning Policy Framework sets out a series of principles which should “underpin both *plan-making and decision-taking*”, those relevant to the development of the site include the following:

- Always seek to secure **high quality** design and a good standard of amenity for all existing and future occupants of land and buildings.
- Take account of the different roles and **character** of different areas, recognising the **intrinsic character** and beauty of the countryside.
- Planning policy should not attempt to impose architectural styles or particular tastes and not stifle innovation, originality or initiative through unsubstantiated requirements, to conform to certain development forms or styles. It is, however, proper to **seek to promote or reinforce local distinctiveness**.
- Help **conserve** and **enhance** the natural environment.
- Respond to **local character** and history, and **reflect the identity** of local surroundings and materials, while not preventing or discouraging appropriate innovation.
- Establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit.
- Address the **connections** between **people** and **places** and the integration of new development into the natural, built and historic environment.

2.2 Local Planning Policy

A new Local Plan for the Tunbridge Wells Borough Council is being prepared and will guide future planning and development within the borough up to 2033. The existing **Local Plan** was adopted in 2006 and is still relevant for the determination of planning applications.

Saved Local Plan relevant to this report are:

Section 2

Landscape Planning Policy Context : Section 2

POLICY MGB1

The openness of the Metropolitan Green Belt, as defined on the Proposals Map, will be preserved and no development which would conflict with the purposes of including land within it will be permitted.

POLICY EN1

All proposals for development within the Plan area will be required to satisfy all of the following criteria:

1. The nature and intensity of the proposed use would be compatible with neighbouring uses and would not cause significant harm to the amenities or character of the area in terms of noise, vibration, smell, safety or health impacts, or excessive traffic generation;
2. The proposal would not cause significant harm to the residential amenities of adjoining occupiers, and would provide adequate residential amenities for future occupiers of the development, when assessed in terms of daylight, sunlight and privacy;
3. The design of the proposal, encompassing scale, layout and orientation of buildings, site coverage by buildings, external appearance, roofscape, materials and landscaping, would respect the context of the site and take account of the efficient use of energy;
4. The proposal would not result in the loss of significant buildings, related spaces, trees, shrubs, hedges, or other features important to the character of the built up area or landscape;
5. There would be no significant adverse effect on any features of nature conservation importance which could not be prevented by conditions or agreements;
6. The design, layout and landscaping of all development should take account of the security of people and property and incorporate measures to reduce or eliminate crime; and

7. The design of public spaces and pedestrian routes to all new development proposals should provide safe and easy access for people with disabilities and people with particular access requirements.

POLICY EN13

Development will not be permitted if it would damage or destroy one or more trees protected by a Tree Preservation Order, or identified as Ancient Woodland, or in a Conservation Area.....

POLICY EN25

Outside of the Limits to Built Development..... all proposals for development will be required to satisfy all of the following criteria:

1. The proposal would have a minimal impact on the landscape character of the locality;
2. The development proposal would have no detrimental impact on the landscape setting of settlements;
3. The development proposal would not result in unsympathetic change to the character of a rural lane which is of landscape, amenity, nature conservation, or historic or archaeological importance;
4. Where built development is proposed, there would be no existing building or structure suitable for conversion or re-use to provide the required facilities. Any new buildings should, where practicable, be located adjacent to existing buildings or be well screened by existing vegetation;

3.0 Landscape Baseline

3.1 Landscape Character

Landscape character It is defined as:

"a **distinct, recognisable and consistent pattern of elements**, be it natural (soil, landform) and/or human (for example settlement and development) in the landscape that makes one landscape different from another, rather than better or worse".

Landscape Character Context

Landscape Character is assessed at different scales, from the national and regional, down to the county, district and site specific.

Assessment of the landscape can help in:

- **Understanding** how and why landscapes are important;
- Promoting an **appreciation** of landscape issues;
- Successfully **accommodating** new development within the landscape;
- **Guiding** and directing landscape change.

Regional Character - The Character Map of England, 1996

In 1996 the former Countryside Commission and English Nature, with support from English Heritage, produced The Character of England Map. This map combines English Nature's Natural Areas and the former Countryside Commission's Countryside Character Areas into a map of 159 Joint Character Areas (JCAs) for the whole of England.

The region is classified in the 'Character of England Map' as original defined by the Natural England as falling within character area 122: High Weald.



Figure 3.1: Extract from National Character Area 122: High Weald.

Section 3

Landscape Baseline : Section 3

The key characteristics of this landscape character area are:

- A faulted landform of clays, sand and soft sandstones with **outcrops** of fissured sandrock and ridges running east–west, deeply incised and intersected with numerous gill streams forming the headwaters of a number of the major rivers – the Rother, Brede, Ouse and Medway – which flow in broad valleys.
- High density of extraction pits, quarries and ponds, in part a consequence of **diverse geology** and highly variable soils over short distances.
- A **dispersed** settlement pattern of hamlets and scattered farmsteads and medieval ridgetop villages founded on trade and non-agricultural rural industries, with a dominance of **timber-framed** buildings with steep roofs often hipped or half-hipped, and an extremely high survival rate of farm buildings dating from the 17th century or earlier.
- **Ancient routeways** in the form of ridgetop roads and a dense system of radiating droveways, often narrow, deeply sunken and edged with trees and wild flower-rich verges and boundary banks. Church towers and spires on the ridges are an **important local landmark**. There is a dense network of small, narrow and winding lanes, often sunken and enclosed by high hedgerows or woodland strips. The area includes several large towns such as Tunbridge Wells, Crowborough, Battle and Heathfield and is closely bordered by others such as Crawley, East Grinstead, Hastings and Horsham.
- An **intimate**, hidden and **small-scale landscape** with glimpses of far-reaching views, giving a sense of remoteness and tranquility yet concealing the highest density of timber-framed buildings anywhere in Europe amidst lanes and paths.
- Strong feeling of remoteness due to very rural, **wooded character**. A great extent of interconnected ancient woods, steep-sided gill woodlands, wooded heaths and shaws in generally small holdings with extensive archaeology and evidence of long-term management.

- **Extensive** broadleaved woodland cover with a very high proportion of **ancient woodland** with high forest, small woods and shaws, plus steep valleys with gill woodland.
- Small and medium-sized **irregularly** shaped fields enclosed by a network of **hedgerows** and wooded shaws, predominantly of medieval origin and managed historically as a **mosaic** of small agricultural holdings typically used for livestock grazing.
- A **predominantly grassland** agricultural landscape grazed mainly with sheep and some cattle.
- There is a strong influence of the Wealden iron industry which started in Roman times, until coke fuel replaced wood and charcoal. There are features such as a notably high number of small **hammer ponds** surviving today.
- Ashdown Forest, in contrast to the more intimate green woods and pastures elsewhere, is a high, rolling and open heathland lying on the sandstone ridges to the west of the area.
- An essentially **medieval landscape** reflected in the patterns of settlement, fields and woodland.
- High-quality vernacular architecture with **distinct local variation** using local materials. Horsham Slate is used on mainly timber structures and timber-framed barns are a particularly notable Wealden characteristic feature of the High Weald.

Landscape Value/Sensitivity

The site lies within Landscape Character Area 122: High Weald, and has many similarities with this area. The site comprises a mosaic of irregular sized, grassed fields which are defined by mature hedgerows with hedgerow trees, creating an intimate, small-scale landscape with limited long distance views.

Areas of dense woodland are a characteristic feature of the north and north east of the site and these woodland compartments **restrict** **intervisibility** with the wider landscape.

The site is visually screened from the neighbouring residential properties to the north and east by mature, well managed hedgerows.

District Character

The Tunbridge Wells Borough Local Development Framework, Borough Landscape Character Assessment 2002: Second Edition (Adopted October 2011) describes the character of the landscape types found within the Tunbridge Wells Borough and provides a framework for the assessment of planning applications within the borough.

The site at Caenwood & Whitegates, Reynolds Lane lies within Local Character Area 5: Speldhurst Wooded Farmland. The key characteristics of this area are:

- **Complex topography** with open, smooth ridges of sandstone radiating out from Royal Tunbridge Wells, cut by deep tributary valleys.
- Conspicuous **outcrops** and **crags** of sandstone which have been weathered into unusual, distinctive forms.
- **Hedgerows** dominated by holly and beech with areas of gorse common in boundaries and verges.
- Varying field sizes from **large-scale** open pasture and arable on the ridge tops to **small, irregular** fields within the valleys.
- Predominantly **ridgetop settlements**, with church spires and towers at Bidborough, Southborough, Speldhurst and Rusthall, are prominent skyline features.

- Extensive, **panoramic views** available out across surrounding countryside and open hill tops.
- Long, narrow **ghyll woodlands**, hidden within deep clefts of the valleys, support a particularly rich, lush vegetation cover.
- **Commons**, permeating the built up areas of Royal Tunbridge Wells and Southborough, retain remnants of their former heathland character.
- Networks of **narrow lanes** descend and climb the valleys and ridges. Dark tunnels of holly and steep banks of sandstone are distinctive features.
- **Conifers**, especially Scots Pine and specimen trees, are **prominent features** within the landscape around the western fringe of Royal Tunbridge Wells.
- Broad **swathes** of permanent and semi-improved **pasture** on the hill slopes represent an internationally important reserve of acidic and neutral grassland.

Landscape Value/Sensitivity

The site lies within Local Character Area 5: Speldhurst Wooded Farmland and displays many of the characteristics of this landscape area. The site occupies a rolling valley landform with a drain running east-west along the centre of the site.

A series of small-scale fields, defined by mature hedgerows with trees and woodland compartments are a prominent feature of the northern and eastern areas of the site. To the south, a larger scale, more open landscape has developed at Smockham and Caenwood Farms.

The boundaries of the site are predominantly defined by high, mature hedgerows which **restrict intervisibility** with the wider landscape. To the south of the site, a high hedge bank further restricts intervisibility.

Local Character

The site is defined to the north by Speldhurst Road, to the east and south east by Reynolds Lane and to the west by Broomhill Road. Footpath WB3 defines the boundary of the site to the south.

The local landscape character is one of a rolling, agrarian landscape, scattered with abundant woodlands. Fields parcels vary in size and are well defined by mature hedgerows. The site is predominantly screened by high, mature hedgerows which define the boundaries, together with an internal network of mature hedgerows and woodland compartments. There appears to be a good woodland age structure, with natural regeneration and new tree planting a predominant feature.

The rolling, valley landscape, with its abundant woodlands, trees and hedgerows creates an enclosed landscape character. Local roads are narrow and winding and are often 'sunken' into the landscape, with high hedge-banks creating a tunnel effect which further restricts visibility.

3.2 Landscape Designations

This section of the LVA describes the statutory designations which relate to the landscape within which the development site is located. The designations relevant to the development are discussed below and are illustrated at Figure 3.2: Landscape Designations.

Scheduled Monuments

Under the Ancient Monuments and Archaeological Areas Act 1979 (1) the Secretary of State for Culture, Media and Sport is required to keep a Schedule of Monuments. The Schedule is administered by Historic England. A SM is a nationally important historic site or monument which is given legal protection

by being placed on a list, or 'schedule'. Scheduling is the only legal protection specifically for archaeological sites.

There are three Scheduled Monuments within the study area:

- Scheduled Monument 1002280: *Prehistoric rock shelters and a multivallate hillfort at High Rocks, 309m ESE of High Rocks Inn*, lies 3km to the south west of the site.
- Scheduled Monument 1013061: *Medieval moated site and post-Medieval ice-house, Moat Farm*, lies between 3km and 4km to the south of the site.
- Scheduled Monument 1005191: *Castle Hill earthworks, Tonbridge*, lies between 3km and 4km to the north east of the site.

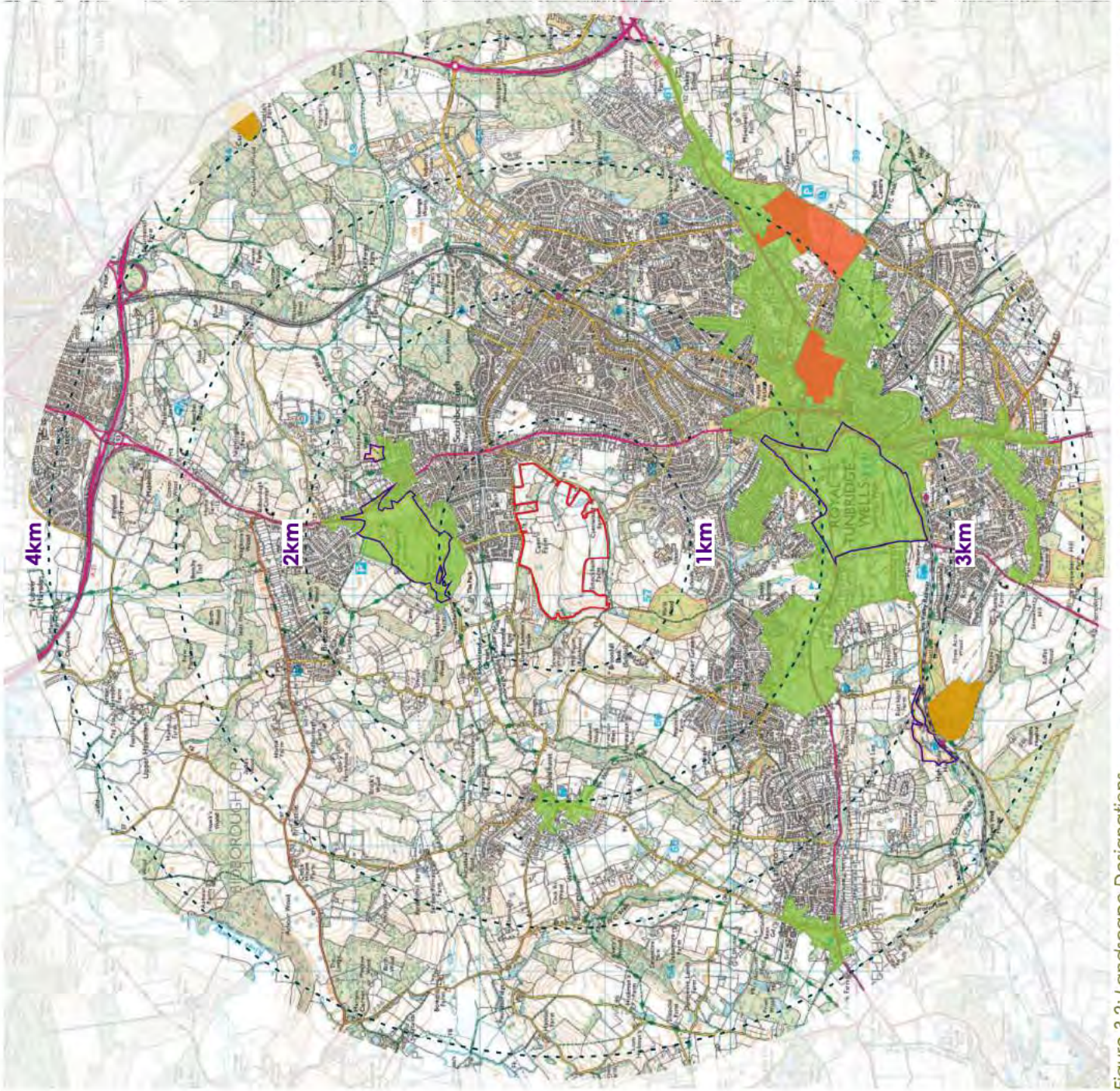
At the time of survey, there was **no intervisibility** between the site and the Scheduled Monuments.

Listed Buildings and Structures

Listed buildings of all grades I, II* and II are defined as being of national importance. Figure 3.2: Landscape Designations illustrates the listed buildings within 2km of the development site.

There are numerous Listed Buildings within the study area. Those situated within 1km of the site are illustrated on Figure 3.3a: *Listed Buildings* whilst those beyond 1km of the site are illustrated on Figure 3.3b: *Listed Buildings up to 4km radius*.

Intervisibility with Listed Buildings within 1km of the site is **largely restricted** by the rolling landscape and mature intervening vegetation. The site provides



Site Location

Zone of Visibility

Scheduled Monument

Registered Park and Garden of Special Historic Interest

Conservation Area

Registered Common Lane / Countryside and Rights of Way Act (CROW) access.



Figure 3.2: Landscape Designations.

Landscape Baseline : Section 3

the landscape setting for the grade II listed Caenwood Farmhouse, whilst it provides a more distant setting for the grade II Smockham Farmhouse and the buildings associated with David Salomon's House, situated to the north west of the site.

There is **no intervisibility** between the remaining listed buildings within a 1km radius and the site. Intervisibility with listed buildings which lie up to 4km of the site is harder to verify, but is predominantly restricted by intervening vegetation which occupies the undulating landform of the Tunbridge Wells borough.

Conservation Areas

Local authorities have a statutory duty to identify, designate, preserve and enhance Conservation Areas within their administrative areas. The aim in a Conservation Area is to preserve or enhance not merely individual buildings but all those elements, which may include minor buildings, trees, open spaces, walls, paving materials etc, which together make up a familiar and cherished local scene.

The Southborough Conservation Area lies to the north east of the site.

The Town of Southborough lies within the Kentish High Weald Area of Outstanding Natural Beauty. The landscape in this area is generally one of undulating ridges and gentle valleys lying between the North and South Downs; with scattered copses with fields and more extensive deciduous woodland. There are also historic parklands associated with major landowners.

The boundary for the Conservation Area was originally designated in June 1969 and centred on the Common and its immediate bounding

development. It was extended slightly in September 1990 to include the northern approach/ Bounds area and the southern approach/ commercial area of the Parade. The Southborough Conservation Area Appraisal, August 2003)

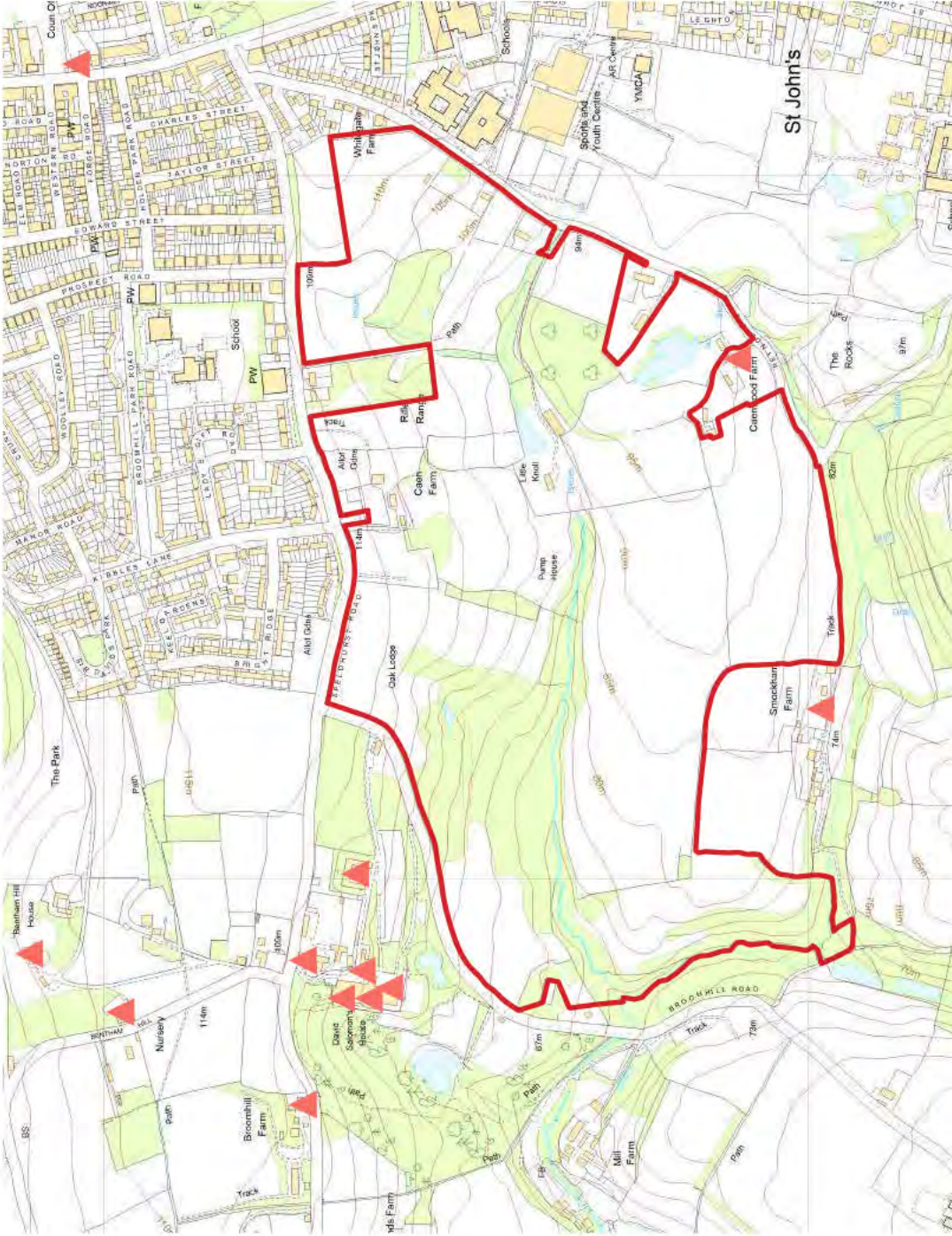
The Langton Green Conservation Area lies to the south west of the site.

Langton Green developed as a nucleated ridgetop settlement within the distinctive landscape which extends westward from Tunbridge Wells, characterised by a number of high ridges intersected by a complex network of valleys. The village itself lies on flattish land along the top of an east-west ridge which drops steeply southwards towards the valley of the River Grom.... This part of the Borough has been designated as "Wooded Farmland" within the Borough Landscape Character Area Assessment. The Langton Green Conservation Area Appraisal, June 2006)

The Tunbridge Wells and Rusthall Conservation Area lies to the south of the site.

Tunbridge Wells derives much of its character from the hills, upon and between which the town is situated. The historic heart of the town, The Pantiles, is set in one of the lowest parts of the valley. Hills rise away from the Pantiles to the north, east and south, in some cases 30m higher within less than 500m distance. In general, the higher ground separates the newer part of the town from the more historic area.... The Royal Tunbridge Wells and Rusthall Conservation Area Appraisal, November 2000).

The Speldhurst Conservation Area lies to the west of the site.



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Figure 3.3a: Listed Buildings.

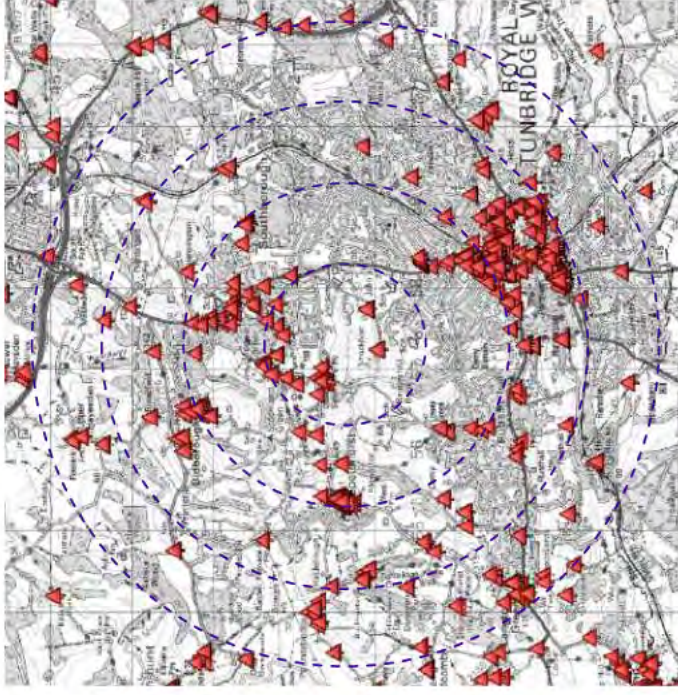


Figure 3.3b: Listed Buildings up to 4km radius (Source Magic).

-  Site Location
-  Listed Buildings

Landscape Baseline : Section 3

Speldhurst developed as a nucleated ridgetop settlement within the distinctive landscape which extends westward from Tunbridge Wells, characterised by a number of high ridges intersected by a complex network of valleys. The village itself lies on the top of a steeply sloping east-facing slope, which drops down to the valley of a stream which eventually feeds into the River Medway. This part of the Borough has been designated as "Wooded Farmland" within the Borough Landscape Character Area Assessment. The Speldhurst Conservation Area Appraisal, June 2006).

The boundaries of the four Conservation Areas are shown on Figure 3.2: Landscape Designations.

Due to the rolling topography of the borough and mature intervening vegetation, at the time of survey, there is **no direct Intervisibility** between the site and the Conservation Areas within the study area.

Registered Common Land / Countryside and Rights of Way (CROW) Act 2000

Under the Countryside and Rights of Way Act 2000 (CROW), the public can walk freely on mapped areas of mountain, moor, heath, downland and registered common land, without having to stick to paths.

Southborough Common is a large area of Registered Common Land to the north east of the site. There is **no Intervisibility** with the site due to intervening vegetation, built form and rolling topography.

There is **no Intervisibility** between other Registered Common Land, CROW designated land within a 4km radius of the site.

High Weald Area of Outstanding Natural Beauty (AONB)

An Area of Outstanding Natural Beauty (AONB) is an area of high scenic quality which has statutory protection in order to conserve and enhance the natural beauty of its landscape. AONB's are managed under The Countryside and Rights of Way (CROW) Act 2000.

The High Weald AONB was designated on the 16th December 1983 and covers an area of 1461 square km. There is **Intervisibility**, with the western boundary of the site adjoining the AONB boundary beyond Broomhill Road.

The High Weald occupies the ridged and faulted sandstone core of an area known from Saxon times as the Weald. It is an area of ancient countryside and one of the best surviving medieval landscapes in Northern Europe....At first glance the High Weald appears to be a densely wooded landscape but closer examination reveals a detailed agricultural tapestry of fields, small woodlands and farmsteads. ... medieval pattern of small fields with sinuous edges surrounded by thick hedges and shaws (often surviving remnants of ancient woodland) remain. Extensive views punctuated by church spires can be glimpsed along the ridge-top roads. Around almost every corner a harmonious group of traditional farm buildings comes into view with their distinctive steep, clay tile and hipped roofs. Everything in the High Weald landscape is human scale. The High Weald Area of Outstanding Natural Beauty Management Plan 2014-2019.

The extent of the High Weald AONB is shown in Figure 3.4: High Weald Area of Outstanding Natural Beauty Boundary.

junction with Prospect Road, Southborough

- Land Behind 1 - 5 Speldhurst Road Royal Tunbridge Wells, Reference: 009/2010/TW, Category: A, Species: Various - All trees of whatever species - Land rear of 1 - 5 (odd) Speldhurst Road, Tunbridge Wells
- Land Behind 1 - 5 Speldhurst Road Royal Tunbridge Wells, Reference: 009/2010/TW, Category: W, Species: Various - Ash, Alder, Cherry, Field Maple, Hawthorn, Hazel, Hornbeam, Oak, Silver Birch - Land rear of 1 - 5 (odd) Speldhurst Road, Tunbridge Wells

There is a **high degree of intervisibility** between the north east corner of the site and the trees covered by the three TPO's.

Beyond the site boundary, within 1km are the a number of TPO's which adjoin the site. There are several TPO's covering the mature woodlands which surround the David Salomons Estate, Broomhill Road (covered by Reference 009/2014 and 030/2013/TW) and also at Land at the Rocks, (Reference 031/2013/TW) off Reynolds Lane, to the south of the site.

Public Rights of Way (PRow)

Public rights of way are highways that allow the public a legal right of passage. The highway authorities keep definitive maps of public rights of way. They provide conclusive evidence of the existence of a PRow.

PRow within 4km of the site are illustrated in Figure 3.5: *Public Rights of Way*. Following a review of topographical information, landscape character assessments and the ZTV map, all PRow within 4km of the site, which have the potential for visibility of the site, were walked during the site survey.

The potential for intervisibility with the site was verified. Photoviewpoints 1 - 9 (pages 27 to 35). illustrate the potential visibility of the site from PRow.

Figure 3.4: High Weald Area of Outstanding Natural Beauty Boundary.

Tree Preservation Order (TPO)

Tree Preservation Orders (TPO) is an order made by a Local Planning Authority in respect of a tree(s) which are considered to bring amenity value to the surrounding area. Once in place, the TPO protects the tree. With specific exceptions, it is an offence to cut down, uproot, prune, lop or damage any tree designated with a TPO, without first obtaining consent. TPO's can relate to single or groups of trees.

There are three TPO's on the site, located to the north east boundary alongside Speldhurst Road. They are:

- Speldhurst Road Southborough, Reference: 026/1984/TW, Category: A, Species: Various - The several trees consisting chiefly of Scots Pine within the area numbered A1 on the map - Belt of trees adjoining the Speldhurst Road from opposite the Ambulance Station running east to opposite the

Landscape Baseline : Section 3

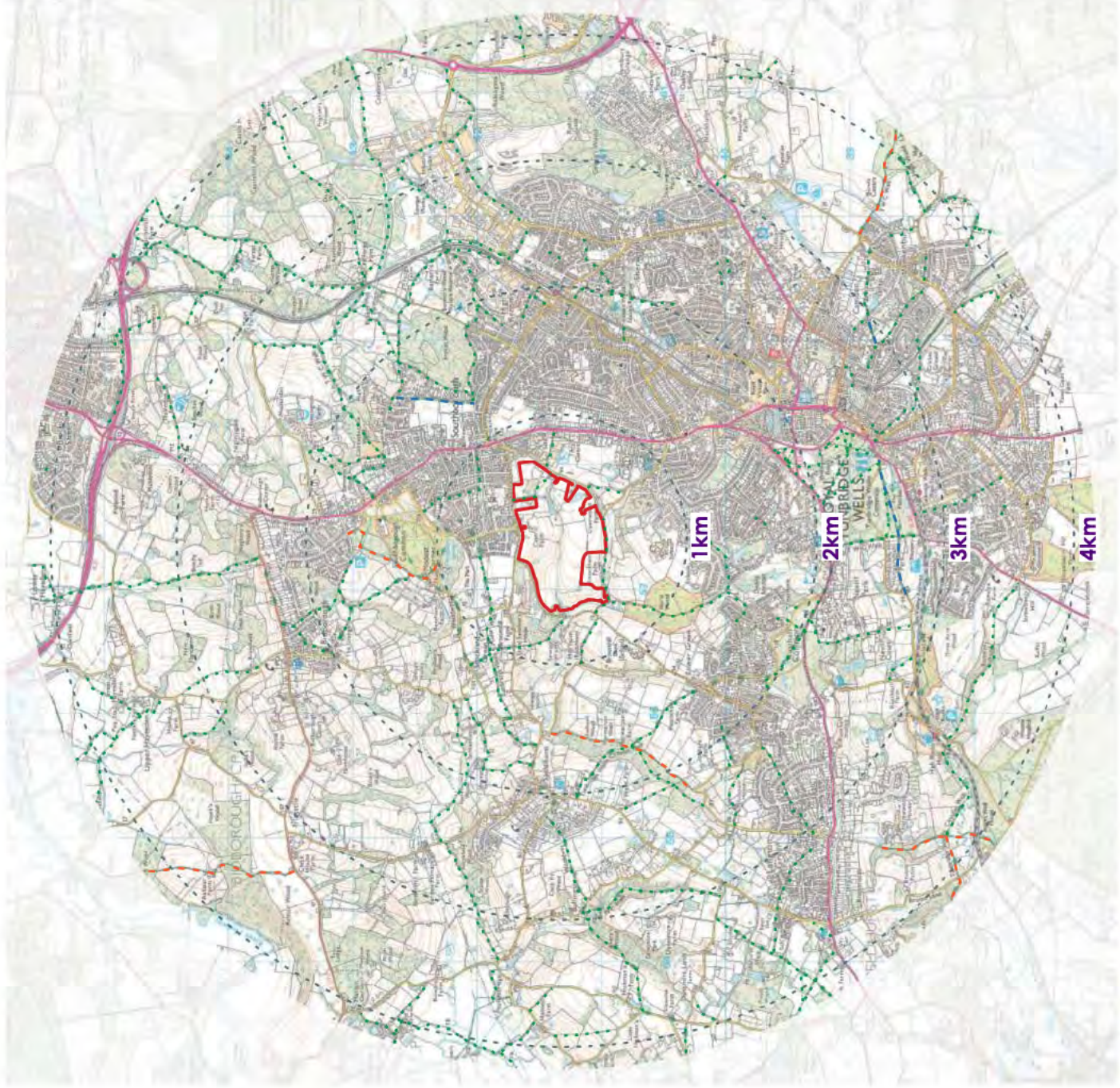


Figure 3.5: Public Rights of Way.

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