Land West of Paddock Wood: Landscape and Visual Appraisal and Green Belt Review

Prepared on behalf of Crest Nicholson Strategic

November 2019
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Barton Willmore LLP
7 Soho Square
London
W1D 3QB

Tel: 020 7446 6888
Fax: 020 7446 6889
Email: matthew.chard@bartonwillmore.co.uk

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Appendix A.1: Extracts from Published Landscape Character Assessment  
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1.0 INTRODUCTION

1.1 Barton Willmore Landscape Planning and Design (BWLPD) have been commissioned by Crest Nicholson Strategic to undertake a Landscape and Visual Appraisal and Green Belt Review (LVAGBR) of land west of Paddock Wood (the 'Site') in order to inform representations to the Tunbridge Wells Borough (TWB) Regulation 18 Draft Local Plan.

1.2 The LVAGBR details the landscape character, landscape value and visual envelope of the Site; provides an assessment of the contribution that the Site makes towards the purposes and function of the Green Belt, as set out in Paragraph 134 of the National Planning Policy Framework (NPPF); and advises on landscape and visual considerations in order to successfully integrate potential development into the surrounding landscape. It also reviews the relevant draft policies of the Regulation 18 Local Plan and considers their soundness against Paragraph 35 of the NPPF from a landscape and visual perspective.

1.3 The Study Area refers to the area included within the viewpoint on Figure 1: Site Context Plan.

1.4 The objectives of the landscape and visual appraisal and Green Belt review are:

- To assess the landscape character of the Site and its context and the function of the Site within the wider landscape, particularly in relation to existing landscape designations and policies;
- To appraise the visibility of the Site and the nature and quality of existing views towards the Site and into and out of the Site;
- To assess the potential of the Site and its landscape context to accommodate development in terms of landscape and visual opportunities and constraints;
- Make recommendations for a suitable landscape strategy which assists with integrating and absorbing the potential development within the landscape and providing a network of green infrastructure;
- To consider the policy basis for the Green Belt designation that applies to the area, as defined on Figure 1: Site Context Plan; and
- To assess the contribution of the Site in response to its Green Belt function and potential for the Green Belt boundary to be amended.

1.5 The following illustrative material supports the LVAGBR:

- Figure 1: Site Context Plan;
- Figure 2: Topography Plan;
• Figure 3: Landscape Character Plan;
• Figure 4: Site Appraisal Plan;
• Figure 5: Visual Appraisal Plan;
• Figure 6: Opportunities and Constraints/ Development Principals Plan
• Site Appraisal Photographs A- P;
• Site Context Photographs 1 -12; and
• Appendix A1: Extracts from Published Landscape Character Assessment
• Appendix A2: Relevant Evidence Base Extracts.
2.0 METHODOLOGY

2.1 Landscape and Visual Appraisal (LVA) and Green Belt Review (GBR) are separate assessments. However, the information ascertained through the LVA is used to aid the assessment of the contribution that the Site makes to the purposes of the Green Belt, including through the assessment of the relationship of the Site with the existing built form; the identification of defensible boundaries that may prevent sprawl; setting out the extent to which development of the Site would result in physical and visual encroachment into the countryside; and the way in which the Site prevents the physical and visual merging of settlements.

Methodology for Landscape and Visual Appraisal

2.2 The LVA has been prepared with reference to the ‘Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3)\(^1\).

2.3 A desktop review of the Study Area was undertaken to identify landform, landscape features, landscape designations and relevant landscape policy, and to review published landscape character information. This information was used as the initial basis against which to appraise the Site and to inform site visits. A visit to the Site and surroundings was subsequently undertaken in July 2018 and January 2019 to verify the desk-based review and add further information to the landscape and visual context of the Site.

2.4 A description of the existing land use of the study area is provided and includes reference to existing areas of settlement, transport routes and vegetation cover, as well as local landscape designations, elements of cultural and heritage value, and any local landmarks or tourist destinations. These factors combine to provide an understanding of landscape value and sensitivity and provide an indication of particular key views and viewpoints that are available to visual receptors.

2.5 To determine the extent of visual influence, a visual appraisal of the Site was undertaken to consider the nature of existing views from publicly accessible viewpoints including roads, Public Rights of Way (PRoW) and public open spaces. Consideration was given to private views, however access to private properties was not obtained. Views were considered from all directions and from a range of near, middle and long-distance views. The viewpoints chosen are not intended to be exhaustive, but rather to represent the potential views obtained towards the Site in order to identify areas of higher visual sensitivity.

2.6 The LVA was used to identify the opportunities and constraints to future development and to inform the masterplan layout for the Site.

**Methodology for Green Belt Review**

Assessment against the purposes of the Green Belt

2.7 The Site was assessed against the first four purposes of the Green Belt as set out in Paragraph 134 of the NPPF, to determine the contribution that the Site makes towards the Green Belt, and which include:

- *(a) To check the unrestricted sprawl of large built-up areas;*
- *(b) To prevent neighbouring towns from merging into one another;*
- *(c) To assist in safeguarding the countryside from encroachment;* and
- *(d) To preserve the setting and special character of historic towns...”*

2.8 With respect to the fifth purpose (e) of the Green Belt "to assist in urban regeneration by encouraging the recycling of derelict and other urban land", should the Site be brought forward for development it would not prejudice derelict or other urban land being brought forward for urban regeneration. The principle of retaining land within the Green Belt holds true for all areas within the Green Belt, therefore the Site is considered to make the same contribution to this purpose of the Green Belt as any other land parcel within the Green Belt. Accordingly, no additional specific assessment is undertaken.

2.9 The criteria used to assess the contribution made to the first four purposes of the Green Belt is set out in Table 2.1.

**Table 2.1: Purposes of the Green Belt - Assessment Criteria**

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Criteria</th>
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<tr>
<td>Check the unrestricted sprawl of large built-up areas</td>
<td>Considerable: Development of the land would be strongly perceived as sprawl, as it is not contained by robust physical features and/or would extend the settlement pattern in an incoherent manner.  Some: Development of the land would be perceived as sprawl, as it is partially contained by robust physical features and/or would extend the settlement pattern in a moderately incoherent manner.  Limited: Development of the land would be perceived as sprawl to a limited degree, as it is largely contained by robust physical features and/or would extend the settlement pattern in a broadly coherent manner.  None: Development of the land would not be perceived as sprawl as it is well contained by robust physical features and/or is entirely set within the existing...</td>
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</table>
### Purpose

<table>
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<th>Criteria</th>
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<td>Coherent settlement pattern.</td>
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**Prevent neighbouring towns from merging into one another**

- Considerable: Development would result in the physical unification of two (or more) towns.
- Some: Development would substantially reduce the physical or perceived separation between towns.
- Limited: Development would result in a slight reduction in the physical or perceived separation between towns.
- None: Development would not physically or perceptually reduce the separation between towns.

**Assist in safeguarding the countryside from encroachment**

- Considerable: No built or engineered forms present and perceived as inherently undeveloped and/or rural in character. Development would potentially result in a strong urbanising influence over the wider landscape.
- Some: Built or engineered forms present but retaining a perception of being predominantly undeveloped and/or rural in character. Development would potentially result in a moderate urbanising influence over the wider landscape.
- Limited: Built or engineered forms present and a minimal perception of being undeveloped and or rural in character. Development would potentially result in a slight urbanising influence over the wider landscape.
- None: Built or engineered forms present and perceived as inherently developed and/or urban in character. Development would not result in urbanising influence over the wider landscape.

**Preserve the setting and special character of historic towns**

- Considerable: Strong physical and/or visual and/or character connection with the historic part of a town. May be within or adjoining the historic part of a town.
- Some: Partial physical and/or visual and/or character connection with the historic part of a town, whilst not adjacent to it.
- Limited: Weak physical and/or visual and/or character connection with the historic part of a town.
- None: No physical and/or visual and/or character connection with the historic part of a town.

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**Assessment against the characteristics of the Green Belt**

2.10 The NPPF states that the key characteristics of the Green Belt are *their openness and their permanence*. In defining new boundaries to the Green Belt, it must be ensured that these characteristics are not diminished for the areas remaining within the Green Belt designation as a direct result of development. An assessment is made of the openness of the Green Belt in the vicinity of the Site and to what extent its removal could have on the perception of openness in the remaining designated area.

2.11 In addition, the relationship of the Site to existing elements, such as built form, roads, railways and rivers, as well as visual barriers, such as ridgelines and areas of notable vegetation is set out. This assists in the assessment of the Site in relation to the existing Green Belt and consideration of potential development in relation to the openness of the remaining Green Belt and the permanence of Green Belt boundaries.
3.0 THE SITE AND ITS CONTEXT

3.1 As illustrated on Figure 1: Site Context Plan, the Site is situated to the west and north-west of Paddock Wood in Tunbridge Wells Borough (TWB), Kent. It is situated within the Kentish Low Weald, a low-lying area to the north of the Kentish High Weald. The Site is bordered along the majority of the eastern boundary by the edge of Paddock Wood, comprising primarily residential development in the south and industrial uses in the north. The north-western and western boundaries are predominantly formed by the A228 Maidstone Road, beyond which is settled countryside. The northern boundary is defined in part by Old Whetsted Road and the field boundary to Hamlet Cottages as well as an east-west field boundary comprising a drain to the north of Leys Cottages. The southern boundary is defined by a ditch and field boundary along its western extent and PRoW WT175 along its eastern extent. Beyond the southern boundary, the land comprises settled farmland, rising southwards beyond the B2017 towards the well-wooded High Weald AONB. The eastern boundary is defined in two parts: The northern section is defined in part by Maidstone Road and field boundaries that surround the Garden Centre north of and including Durrant’s Farm; and the southern section is defined by the existing western built up edge of Paddock Wood. The majority of the Site is located within the very outer edge of the London Metropolitan Green Belt.

Land Use and Settlement

3.2 Paddock Wood is the largest settlement within the Study Area, being situated 10km to the north-east of Tunbridge Wells. The majority of Paddock Wood comprises post-war development situated to the south of the ‘Knockholt to Dover’ railway line (part of the South Eastern Main Line). The area to the north of the railway line comprises predominantly industrial land uses, primarily associated with the food, beverages and brewing industries.

3.3 The only other notable area of settlement within the area is the village of Five Oak Green, situated 1.5km to the west of Paddock Wood along the B2017 and the railway line. The remainder of the Study Area comprises settled farmland interspersed with villages located along the main transport routes, including Capel, 1.5km to the east; East Peckham, 2.5km to the north; and Golden Green, 3km to the north-west. These settlements, along with frequent farmsteads and clusters of dwellings, create an overall settled character.

3.4 The Site itself comprises an area of primarily arable farmland on the immediate western edge of Paddock Wood, bordered by individual farmsteads, commercial units and residential development around the remainder of its boundaries.
Topography and Hydrology

3.5 The topographical variation of the Study Area and Site is demonstrated on Figure 2: Topography Plan.

3.6 The land rises up from below 15m AOD (Above Ordnance Datum) in the north to over 105m in the south in the High Weald. The majority of the Study Area is situated at below 25m AOD, albeit with a steep incline to the south as the land rises to form the northern escarpment of the High Weald. Paddock Wood itself is situated between 15m AOD in the north and 25m AOD along its southern edges.

3.7 The River Medway flows through the northern extent of the Study Area and this is fed by a network of tributaries extending from the higher ground of the High Weald to the south. Several large areas of ponds are also located at points in the north of the Study Area near East Peckham, in the North West at Poors Mead and in the south-east near Mile Oak.

3.8 The Site itself occupies land that gradually rises from between just below 15m AOD in the north to between 18 and 20m AOD in the south, and as a result appears generally level. The Tudeley Brook flows through the Site, extending from the centre of the southern boundary, along the eastern boundary (between the Site and the neighbouring industrial areas), and through the centre of the northern area of the Site. Other open drains extend through the Site, predominantly along the edges of fields forming part of the wider connected network of water courses.

Vegetation and Field Pattern

3.9 The Study Area in general is made up of small to medium sized irregular fields separated by hedgerows and tree belts. Large blocks of woodland occur throughout the Study Area, particularly on the higher ground of the High Weald to the south and in smaller areas along the route of the Medway.

3.10 Field rationalisation is particularly evident in the area west of Paddock Wood where larger open fields dominate the landscape of the Site. Where field boundaries remain, these still comprise belts of mature trees including Oak species. The Ancient Woodland of Whetsted Wood, which includes areas of former hazel coppice, is situated in the southern part of the Site, separated into two parts by the railway line. To the south of the railway line and beyond the southern boundary of the Site, the field pattern is more intact, with fields separated by belts of mature trees.
Access and Rights of Way

3.11 The main road through the area is the A228 Maidstone Road, which extends broadly from the south-western corner of the Study Area towards the north and which forms the western and north-western boundaries of the Site. The B2160 also extends from the south of the Study Area to the north and passes through the centre of Paddock Wood, forming the northern part of the eastern boundary. The ‘Knockholt to Dover’ stretch of the South Eastern Main Line extends east to west through the centre of the Study Area and passes directly through the Site separating it into two parts – the larger northern part and the smaller southern part. The ‘Rochester to Paddock Wood’ line of the Medway Valley Line extends north from Paddock Wood Station.

3.12 There is an extensive network of Public Rights of Way (PRoW) within the Study Area, except for the north-eastern area, east of the Medway Valley Line and north of the South Eastern Main Line. PRoW WT175 extends north to south through the Site, broadly following the route of the Tudeley Brook. This is crossed by WT179 and WT176, both of which extend east to west from the A228 to the west through to the centre of Paddock Wood in the east.

Designations

3.13 The south-western corner of the Study Area falls within the High Weald Area of Outstanding Natural Beauty (AONB), at a distance of over 1.5km from the southern boundary of the Site. Areas of Ancient Woodland occur primarily in the south of the Study Area within the High Weald. Whetsted Wood situated within the centre of the Site either side of the railway line is Ancient Woodland.

3.14 The Site does not fall within the AONB or within a Special Landscape Area (SLA), as defined by Tunbridge Wells Borough Local Plan (2006).

3.15 The land west of PRoW WT175 within the western part of the Study Area is located within the London Metropolitan Green Belt. Green Belt is not a landscape of visual designation, but a functional planning designation. However, it is assessed in terms of features that relate to landscape and visual matters. An assessment of the Green Belt and the Site’s contribution towards it is included within section 7 below.
4.0 RELEVANT PLANNING POLICY AND GUIDANCE

4.1 The landscape policy context and evidence base for the Site includes the following:

- The National Planning Policy Framework\(^2\);
- Planning Practice Guidance (PPG);
- Tunbridge Wells Local Plan Saved Policies\(^3\);
- Tunbridge Wells Local Plan Core Strategy\(^4\);
- Tunbridge Wells Local Plan Site Allocations\(^5\);
- Tunbridge Wells Local Plan Issues and Options Consultation\(^6\);
- Tunbridge Wells Regulation 18 Draft Local Plan\(^7\);
- The Strategic Housing and Economic Land Availability Assessment (SHELAA) (July 2019)\(^8\);
- Tunbridge Wells Landscape Character Assessment and Capacity Study\(^9\);
- Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells: Paddock Wood, Horsmonden, Hawkhurst, Cranbrook (July 2018)\(^10\);
- TWB Green Infrastructure Framework (September 2019)\(^11\);
- Sustainability Appraisal (September 2019)\(^12\);
- High Weald AONB Management Plan\(^13\).

4.2 Green Belt assessments are described in section 7 below.

4.3 The National Planning Policy Framework (NPPF) which was first published in March 2012 has been updated and published in February 2019. The NPPF promotes a presumption in favour of sustainable

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\(^2\) Department for Communities and Local Government (February 2019) *National Planning Policy Framework*

\(^3\) Tunbridge Wells Borough Council (2006) *Local Plan Saved Policies* (Saved 2009)

\(^4\) Tunbridge Wells Borough Council (2010) *Core Strategy*

\(^5\) Tunbridge Wells Borough Council (2016) *Site Allocations Local Plan*

\(^6\) Tunbridge Wells Borough Council (2017) *Issues and Options Consultation*

\(^7\) Tunbridge Wells Borough Council (2019) *Draft Local Plan Regulation 18 Consultation Draft 20 September to 1 November 2019*

\(^8\) Tunbridge Wells Borough (July 2019) *Strategic Housing and Economic Land Availability Assessment*

\(^9\) Tunbridge Wells Borough Council (2009) *Local Development Framework: Landscape Character Assessment and Capacity Study*

\(^10\) LUC (2018) *Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells, Paddock Wood, Horsmonden, Hawkhurst, Cranbrook*

\(^11\) Tunbridge Wells Borough Council (2019) *Green Infrastructure Framework for Draft Local Plan - Regulation 18 Consultation*

\(^12\) Tunbridge Wells Borough Council (2019) *Sustainability Appraisal of the Draft Local Plan for Regulation 18 Consultation*

development, defined as "meeting the needs of the present without compromising the ability of future generations to meet their own needs", and providing it is in accordance with the relevant up-to-date Local Plan, and policies set out in the NPPF including those identifying restrictions with regard to designated areas, such as National Parks, Areas of Outstanding Natural Beauty (AONB) and Green Belt.

4.4 Paragraph 35 deals with the ‘soundness’ of local plans and states that:

"Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are 'sound’ if they are:

a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework."

4.5 Chapter 12 (Paragraphs 124-132) focuses on achieving well-designed places and seeks to promote good design of the built environment. Paragraph 127 states that Planning policies and decisions should ensure that developments:

a) "Will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) Are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
c) Are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) Establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) Optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and

f) Create places that are safe, inclusive and accessible and which promote health and well-being with a high standard of amenity for existing and future users and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.”

4.6 Chapter 13 is dedicated to issues of protecting the Green Belt, with Paragraph 133 stating “…the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open” and that “the essential characteristics of Green Belts are their openness and their permanence”.

4.7 Paragraph 134 subsequently sets out the following five purposes of the Green Belt:

- "To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.”

4.8 In respect to altering Green Belt boundaries Paragraph 136 states that:

“Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies
should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period. Where a need for changes to Green Belt boundaries has been established through strategic policies, detailed amendments to those boundaries may be made through non-strategic policies, including neighbourhood plans.”

4.9 Paragraph 138 notes in respect of the review of Green Belt boundaries, through the process of strategic policy review that:

"When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. Strategic policy-making authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary. Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to land which has been previously-developed and/or is well-served by public transport. They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land”.

4.10 In respect of Green Belt Boundaries, Paragraph 139 states that:

"When defining Green Belt boundaries, plans should:
...
  b) not include land which it is unnecessary to keep permanently open;
  ...;
  e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
  f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.”
4.11 Chapter 15 relates to the conservation and enhancement of the natural environment, with Paragraph 170 stating:

"Planning policies and decisions should contribute to and enhance the natural and local environment by:

a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystems services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

...;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

...

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate."

4.12 Paragraph 171 states "Plans should distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value, where consistent with other policies in this Framework; take a strategic approach to maintaining and enhancing networks of habitats and green infrastructure; and plan for the enhancement of natural capital at a catchment or landscape scale across local authority boundaries”.

4.13 Paragraph 172 states "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...”

Planning Practice Guidance

4.14 To support the policies of the NPPF, the Government provides Planning Practice Guidance (PPG), which covers a number of topics. The PPG was first published online in March 2014 and provides detailed guidance to support the NPPF. The PPG was last updated on 1st October 2019 and replaces the previous guidance on 'Design: Process and tools', with the National Design Guide setting out the
characteristics of well-designed places and demonstrates what good design means in practice to be read alongside this guidance.

4.15 Under the heading Planning for well-designed places, Paragraph: 001 Reference ID: 26-001-20191001 of the PPG states that "as set out in paragraph 130 of the National Planning Policy Framework, permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions, taking into account any local design standards or style guides in plans or supplementary planning documents". Good design is set out in the National Design Guide under the following 10 characteristics:

- "Context;"
- Identity;
- Built form;
- Movement;
- Nature;
- Public Spaces (safe, social and inclusive);
- Uses;
- Homes and Buildings;
- Resources; and
- Lifespan."

4.16 Further guidance is outlined within the 10 characteristics in the National Design Guide. Those of relevance to design and landscape and visual matters include:

- C1: Understand and relate well to the site, its local and wider context;
- C2: Value heritage, local history and culture;
- I1: Respond to existing local character and identity;
- I2: Well-designed, high quality and attractive;
- I3: Create character and identity;
- B1: Compact form of development;
- B2: Appropriate building types and forms;
- B3: Destinations;
- N1: Provide high quality, green open spaces with a variety of landscapes and activities, including play;
- N3: Support rich and varied biodiversity;
- P1: Create well-located, high quality and attractive public spaces;
- P2: Provide well-designed spaces that are safe;
• P3: Make sure public spaces support social interaction; and
• L1: Well-managed and maintained.

4.17 Under the heading of Natural Environment, sub-heading Green infrastructure, Paragraph 5 focuses on the natural capital green infrastructure can add to communities including, “...enhanced wellbeing, outdoor recreation and access, enhanced biodiversity and landscapes...”. Paragraph 6 outlines several benefits of Green Infrastructure, including:

• "... Achieving well-designed places;
• Promoting healthy and safe communities;
• Mitigating climate change, flooding and coastal change; and
• Conserving and enhancing the natural environment”.

4.18 Under the heading of Natural Environment, sub-heading Landscape, Paragraph 37 in the PPG supports the use of Landscape Sensitivity and Capacity Assessments "to help assess the type and scale of development that might be able to be accommodated without compromising landscape character". It also supports the use of Landscape and Visual Impact Assessment to "demonstrate the likely effects of a proposed development on the landscape”.

4.19 Paragraph 42 makes reference to the setting of National Parks and Areas of Outstanding Natural Beauty setting, noting 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.”

Local – existing

Tunbridge Wells Local Plan (2006)

4.20 The Tunbridge Wells Local Plan provides local planning policies to provide for both change and conservation in the Borough. The following saved policies (in 2009) from the Local Plan are of relevance to the potential for development on the Site in relation to Landscape, visual and Green Belt matters:

• Policy MGB1 – Protects the Green Belt from inappropriate development;
• Policy EN1 – Development must not cause significant harm to the character of the area, will respect the context of the site and will not remove features important to local character;
• Policy EN8 – Lighting must not be visually intrusive;
• Policy EN13 – Development will not be permitted if it would damage or destroy TPO trees or Ancient Woodland; and
• Policy EN25 – Development outside of the settlement limits must have a minimal impact upon landscape character and have no detrimental impact on the landscape setting of settlements.

Tunbridge Wells Local Plan Core Strategy (2010)

4.21 The Core Strategy Development Plan Document is a statutory part of the Local Development Framework that sets out the amount of development required across the Borough to 2026. The following saved policies are of relevance to the potential for development on the Site in relation to Landscape, visual and Green Belt matters:

• Core Policy 2: Green Belt – protection of the openness of the Green Belt;
• Core Policy 4: Environment – Urban and rural landscapes, including the AONB, will be conserved and enhanced, the Borough Landscape Character Assessment will be used to manage, conserve and enhance the landscape, creation and extension of the green infrastructure network;
• Core Policy 11: Development in Paddock Wood – a locally-distinctive design identity will be defined for the town and new development should contribute to the furtherance of that identity as well as paying particular attention to the integration of the townscape and surrounding landscape with a view to enhancing the quality of the local environment; and
• Core Policy 14: Development in the Villages and Rural Areas – designated buildings and areas of historic or environmental importance will be conserved and enhanced to maintain the special character of villages, the interrelationship between natural and built features of the landscape will be protected and enhanced.

Tunbridge Wells Local Plan Site Allocations (2016)

4.22 The Site Allocations Local Plan is one of a suite of planning policy documents that sets out the specific sites that the Council believes should be developed in order to meet the levels of growth set out in our adopted Core Strategy (2010). The following saved policies are of relevance to the potential for development on the Site in relation to Landscape, visual and Green Belt matters:
• AL/STR 2: Environmental and Recreational Designations – These will remain defined on the Proposals Map and the emerging Local Plan will provide more details as to the approach to them.

Tunbridge Wells Local Plan Issues and Options Consultation

4.23 The following sections of the Issues and Options Consultation Document are of relevance:

• Vision – New development will seek to protect and enhance the built, natural and historic environment; and
• Strategic Objective 2 – Development will seek to maintain special character.

Local – Emerging

Tunbridge Wells Draft Local Plan Regulation 18 Consultation Draft (November 2019)

4.24 The Tunbridge Wells Local Plan Regulation 18 Draft (TWLP) sets out the Borough Council’s proposed strategy for the future development of the borough, the site allocations that relate to this and the relevant policies against which future planning applications will be assessed.

4.25 Once adopted, the TWLP will replace the existing planning framework comprising the Tunbridge Wells Borough Local Plan 2006 (saved policies), the Core Strategy 2010, and the Site Allocations Local Plan 2016 as outlined above.

4.26 Key issues highlighted in the consultation on page 14 that are of relevance to landscape and visual matters include:

• "Importance of the protection of the landscape (including the Area of Outstanding Natural Beauty) and the historic environment of the borough, as well as non-designated assets that are still valued by residents and visitors; and
• Protection of the Green Belt when considering new development."

4.27 Challenges and opportunities related to the natural, built and historic environment in the borough are highlighted on page 29 and include the following:
• "Both the natural and built environment of the borough are of high quality, with 70% of the borough designated as High Weald AONB, of national significance...;"
• "...all areas have distinct landscape and environmental characteristics much valued by residents, with commons, village greens, and parks providing important spaces and links to the countryside; and"
• "The rural landscape is rich in designated historic parks and gardens, extensive areas of ancient woodland, ancient field patterns and hedgerows..."

4.28 The following policies are of relevance to the potential for development on the Site in relation to landscape, visual and Green Belt matters:

STR 4: Green Belt

"...In order to protect the remaining Green Belt ... the Council will consider the proposal against the relevant policy in the National Planning Policy Framework, or the national planning policy at the time a planning application is being determined".

STR 7: Place Shaping and Design

"All new development must aim to meet high standards of urban and architectural design and have regard to any design guidance adopted by the Council. The Council will require the use of masterplanning, including the use of design codes and sustainable design standards where appropriate, for strategic and larger scale developments ...

All new development must use the following principles relevant to its location, scale, and use:

• 1. Respond positively to local character and context to preserve and enhance the quality of existing communities and their environs;
• 2. Provide buildings that exhibit individual architectural quality within well considered public and private realms;
3. Protect and enhance assets of historic, landscape, or biodiversity value;

4. Enhance the public realm through additional landscaping, street furniture, public art, and other distinctive features that help to create a sense of place;

5. Ensure all components of the proposal, such as buildings, car parking, and new connections, open space, and landscaping, are well integrated as part of the overall design, to be accessible, legible, adaptable, and inclusive to everyone, safe and well related to one another;

6. Prioritise the needs of pedestrians, cyclists, and public transport services;

...”

STR 8: Conserving and enhancing the natural, built, and historic environment

"The natural, built, and historic environment, including landscape assets, biodiversity, geodiversity, priority habitats and species, and statutory and locally designated sites, will be conserved and enhanced by the following approach:

1. The urban and rural landscapes of the borough, including the designated High Weald AONB, will be conserved and enhanced;

2. The landscape character of the borough will be protected through retention and enhancement of the key characteristics or valued landscape features and qualities, as well as through the restoration of landscape character where it has been eroded;

3. Where development proposals have an impact on the landscape, developers will be required to clearly demonstrate that any harmful effects have, where possible, been avoided. Where effects are unavoidable, suitable mitigation must be provided that identifies all important landscape features and, where possible, are incorporated into the proposal;

4. Any new landscaping must make a positive contribution to the local landscape character;

5. Within the area designated as AONB and its setting, development will be managed in a way that conserves and
enhances the natural beauty of the area, and developers will be expected to demonstrate ... how proposals have had regard to the objectives of the High Weald AONB Management Plan...;

* "...

STR/PW1: The Strategy for Paddock Wood

"At the parish of Paddock Wood ... proposals shall accord with the following requirements:

• 1. Together with land outside Paddock Wood parish (in Capel parish...), provision will be made for a proportion of approximately 4,000 new dwellings, considerable employment and associated education, leisure, and health facilities to be delivered on land referred to as land at Capel and Paddock Wood (Policy AL/PW 1) ... These shall be developed using a comprehensive masterplanned approach...;

• ...

• 7. Development at land at Capel and Paddock Wood will require the release of Green Belt Land...;

• 8. The provision of natural and semi natural green space, a range of formal and informal open space, children's and youth play space, sports pitches and allotments/food growing areas will be made to meet the needs of a growing population;

• 9. Sites outside the AONB but within the High Weald National Character Area, or close to the boundary of the designated AONB landscape, will have similar characteristics and are likely to contribute to the setting of the designated landscape. The AONB Management Plan and any supporting guidance will be a material consideration for these sites.

* ...

Landscape

• 1. Strong green infrastructure must be provided to tie in new development with the surrounding landscape. Multi-functional green infrastructure (green wedges) to be integrated with drainage and flood defence measures ...

• 2. Avoid built development on slopes to the south to Paddock Wood.
Policy AL/PW1: Land at Capel and Paddock Wood

4.29 Allocation policies relating to Policy AL/PW 1 provides guidance for development relating to land to the west of the settlement of Paddock Wood, which the Site sits within. It should be noted that Policy AL/CA 3: Land at Capel and Paddock Wood (page 166-168) duplicates the information set out for Policy AL/PW1 set out below.

“...
Development on the site shall accord with the following requirements:

1) All development to be delivered through a comprehensive masterplan approach, following garden village principles, including 'green wedges' between areas of development...;
2) All development must demonstrate how it meets and embeds the key qualities below:
   • “Clear identity - a distinctive local identity as a new garden community, including ... public realm;
   • ...
   • Green space – generous, accessible, and good quality green and blue infrastructure that promotes health, wellbeing, and quality of life, and considers opportunities to deliver environmental gains such as biodiversity net gain and enhancements to natural capital;
   • ...; and
   • Future proofed – designed to be resilient places... with durable landscape and building design planned for generations to come.”
5) The masterplan shall be informed by detailed studies within and surrounding the allocation that shall include land use, landscape character, visual amenity, biodiversity and heritage. Particular attention will be given to:
   • ...
   • Key landscape characteristics, views and the setting of heritage assets and the setting of the High Weald AONB ...;
   • Existing habitats and species and opportunities for landscape scale improvements for biodiversity to ensure a net gain for
biodiversity focused on key locally important habitats and species ...

8) Provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality shall be made, to be agreed and secured through the masterplanning approach ...

10) A strategic approach to increase walking and cycling permeability will be included in the masterplanning ...”

4.30 The Site falls across parcels 1, 2, 3 and 4 AS identified in Policy AL/PW1 of the TWLP. Table 4 (page 178-182) provides a series of opportunities and constraints for the parcels, which are outlined in Section 8 below.

EN 1: Design and other development management criteria

“All proposals for development within the borough will be required to satisfy all of the following criteria ...

1. Character and site context
   • "1. The proposal should firstly seek to avoid the loss of buildings that contribute positively to the locality and street scene, heritage assets, open spaces, trees/vegetation, features of biodiversity/geodiversity, or other features important to the built or landscape character of the area, unless the proposed development is demonstrably improved overall; and
   For any new development proposals:
   • 2. The siting, layout, density, spacing, orientation, and landscaping must respect the characteristics of the site, including its topography and any natural features, its relationship with immediate surroundings, and where appropriate, views into and out of the site; and
   • 3. The scale, form, height, massing, proportions, external appearance, and materials should be compatible with existing buildings, building lines, landscape and treescapes, rooftscapes, and skylines
   • "...
   ...”
3. Landscaping, Trees, and Amenity

- 1. Existing individual trees, or groups of trees, that contribute positively to the area shall be retained...
- 2. The proposal should be accompanied by an integral landscaping (both hard and soft) scheme, which contributes to, and enhances, the natural and local environment, including sympathetic boundary treatments;
- 3. In rural areas, particular attention should be paid to the retention and addition of native vegetation appropriate to the local landscape character to help assimilate development into its rural setting...

"Planning permission will not normally be permitted where the proposal adversely affects important trees, woodlands, and hedgerows ..."

"Where there is an unavoidable loss of trees on site, however, an appropriate number of suitable replacement trees (in terms of species and size) will be required to be planted on site..."

Policy EN 15: Ancient Woodland and Veteran Trees

"Loss or deterioration of irreplaceable habitats, including ancient woodland and aged or veteran trees found outside ancient woodland, resulting from development proposals shall not be allowed unless there are wholly exceptional reasons..."

Policy EN 16: Green, Grey, and Blue Infrastructure

"Development proposals will be expected to identify and protect existing green, grey, and blue infrastructure and identify opportunities for new infrastructure where it supports climate change adaptation and ecosystem services, and where it makes a positive contribution to strengthening and restoring a healthy and..."
"integrated network of habitats and green spaces for the benefit of nature, people, and the economy..."

EN 20: Rural Landscape

"Development will be required to:
1) Conserve and enhance the unique and diverse variety and juxtaposition of the borough’s landscape and the special features that contribute positively to the local sense of place; and
2) Not cause significant harm to the landscape setting of settlements, including historic farmsteads and hamlets; and...
4) Restore landscape character where it has been eroded;...

EN 21: High Weald Area of Outstanding Natural Beauty (AONB)

"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..."

Evidence Base

The Strategic Housing and Economic Land Availability Assessment (SHELAA) (July 2019)

4.31 The SHELAA forms part of the evidence base for the TWLP. The purpose of carrying out a SHELAA is to identify a potential supply of land that is suitable, available and achievable to meet identified housing and economic development needs over the plan period (2016 to 2036). The SHELAA is not an allocations document; it does not form Council policy but provides a technical assessment of the potential of sites for allocation for future land supply.

4.32 SHELAA parcels 309 to 319 (inclusive) fall within the Site. These, along with several other parcels falling within the allocated Local Plan Allocation AL/PW1 (and AL/CA3) were considered collectively as Local Plan Allocation AL/PW1 ('Land at Capel and Paddock Wood') within the assessment for Paddock Wood.

4.33 The Site Assessment Sheets for Paddock Wood (Appendix/Section 11: Site Assessment Sheets for Paddock Wood) describes Land at Capel and Paddock Wood as comprising "predominantly
agricultural land including crop and some top fruit, together with areas of woodland ... and horse paddocks” and as being "surrounded on its outer edges by further agricultural or paddock land, plus residences, recreational fishing lakes and solar farms” and on its inner boundaries by "predominantly residential, employment and educational uses comprising the existing settlement of Paddock Wood". Site boundaries are noted as comprising a mix of trees, hedging and fencing.

4.34 Several issues to consider are listed, including: “AONB...; Heritage - Listed Building; Ecological interest; notable feature/designation...”.

4.35 Local Plan Allocation AL/PW1 is assessed as being ‘Suitable’, with the conclusion stating that "The site is outside the AONB: the policy constraints of this national designation do not apply” and that whilst the TWB Green Belt Study (2017) identified that the harm caused by the release of land in the south west corner was 'moderate' "It did not consider the land in the western edge of the site in that granularity of detail – the harm identified in broad parcel is "high". The BW Green Belt Review in Section 7 below considers the Site at this granularity of detail and demonstrates that at this scale the level of harm is less than that assessed for the broad parcel.

4.36 The conclusion goes on to state "subject to the demonstration that there are exceptional circumstances to release this land from the Green Belt, and that matters such as the provision of appropriate infrastructure ... and mitigation of flooding impacts can be addressed through a masterplanned approach, the site is considered suitable”.

TWB Green Infrastructure Framework for Local Plan Regulation 18 Consultation (September 2019)

4.37 The purpose of this document is to provide a framework for protecting and enhancing existing Green Infrastructure (GI) and for providing new GI as part of development provided for through the new Local Plan.

4.38 The gap analysis on (paragraph 40) notes that in regard to access to natural greenspace there is generally good access to 20 ha sites but that "Sandhurst and Paddock Wood have very poor access"; that there is generally good access to 100 ha sites but with "gaps in ... Paddock Wood...”. Paragraph 41 reiterates these points by stating "There are two locations, Sandhurst and Paddock Wood that are poorly served with regards access to a 20ha and 100ha sites". It goes on to say that "Paddock Wood is the subject of a proposed major expansion and a new settlement is proposed in the adjoining Parish of Capel both to be delivered by a masterplanning process according to garden settlements principles which provides a significant opportunity to provide for and address any shortfall in natural green space
4.39 Section 4 of the report outlines GI options and opportunities, with the planned growth in the TWLP of more than 13,000 new houses noted as "a considerable challenge and opportunity for biodiversity and GI". It is also stated in relation biodiversity gain and improved GI that "Many development sites will be able to achieve this on or immediately adjacent to the proposed development..." through "...being given over to ecological areas and green spaces and with adjacent areas of ancient woodland being put into long term management under Landscape and Ecological Management Plans...". Specifically in relation to the Site, paragraph 62 states "those strategic sites at Paddock Wood and Capel parishes within the Green Belt are required by policy to provide compensatory improvements to the environmental quality and accessibility of remaining Green Belt thereby strengthening existing GI”.

4.40 Priorities for GI are outlined in paragraph 69, which states:

"Application of the mitigation hierarchy means that existing GI should be retained and enhanced in the majority of cases as a matter of course. The priority for intervention will then be improving connectivity through either habitat improvements, the provision of landscape and/or ecological buffers and/or through the provision of new features such as woodland, hedgerows, species rich grassland etc. that connects existing habitats...”

Sustainability Appraisal (September 2019)

4.41 The Sustainability Appraisal (SA) evaluates the social, economic and environmental impacts of policies and strategies in a Local Plan to determine to what extent they are in agreement with sustainable development objectives.

4.42 In regard to the proposed urban extension at Paddock Wood, four scales of development were identified (illustrated on Figure 7 page 47), as follows:

- Option 1 - approximately 3,000 dwellings without any land take within the Green Belt (not including the Site);
- Option 2 - approximately 5,000 dwellings following the same pattern as Option 1 with an additional extension of development westwards (including the Site) into the Green Belt some of which contributes weakly to Green Belt objectives;
- Option 3 - approximately 4,000 dwellings following the same pattern as Option 1 but extending southwards instead of westwards (i.e. not including the Site) into land that is not ruled out by constraints such as AONB, Green Belt, flood risk and ancient woodland; and
- Option 4 – approximately 6,000 dwellings following the same pattern as Option 1 but extending both westwards (including the Site) and southwards and effectively doubling the size of Paddock Wood

4.43 The SA scores for Option 2 and 4 (i.e. the options incorporating the Site) were ‘Slightly Negative’ and ‘Negative’ respectively. The commentary in Table 17 (page 48) states that "Landscape scores follow a similar pattern to heritage reflecting encroachment into the High Weald Character Area in the south".

4.44 The SA scores for Allocation AL/PW1 are outlined in Table 27 (page 70), with the score for landscape identified as ‘Slightly Negative’. The commentary section of Table 27 states that "...Environmental objectives are mostly negative reflecting the scale of development proposed" but that "biodiversity is scored as slightly positive overall to reflect the large improvements that can be made with AL/PW 1".

4.45 Appendix B sets out mitigation measures proposed by the SA for potential development sites. The following are relevant to landscape, visual and Green Belt matters:

- "Incorporate landscape and open space buffers to sites with sensitive landscape features;
- Incorporate management expectations for well-related sites of biodiversity value;
- Include wording that offers protection for trees and non-ancient woodland;
- ... Retain hedgerows."

Tunbridge Wells Landscape Character Assessment and Capacity Study (2009)

4.46 This document assessed area PW8 (covering the entire Site) as being of moderate landscape capacity to accept residential and commercial development. The area was described as an open ‘prairie’ landscape that was of moderate to high visual sensitivity due to its loss of boundaries.
4.47 Section 5.3 (page 24) of the document addresses Paddock Wood. The document states that the flat and open character of the landscape makes it vulnerable to sprawl and that any new development would need to be designed “within the context of a substantial green infrastructure” and that the green infrastructure would need to be sensitive to local landscape character and distinctiveness.

4.48 The industrial estates are assessed as intruding into the rural landscape, particularly in the north-west (the north of the Site). The document acknowledges that the area to the north and west are constrained by flood plain but that the countryside to the north-east is characterised by “an intricate network of country lanes and remnant orchards” that would be sensitive to major change.

Landscape Sensitivity Assessment of additional settlements in Tunbridge Wells: Paddock Wood, Horsmonden, Hawkhurst, Cranbrook (July 2018)

4.49 This assessment expands upon the landscape capacity study (2009) and provides an assessment of the extent to which the character and quality of the landscape around four settlements within the Borough (including Paddock Wood) is, in principle, susceptible to change as a result of introducing particular types of development. The development typologies considered are: Small (two/two and a half-storey residential dwellings); Medium (three or four-storey residential); and Large scale (large commercial/industrial units or hotels).

4.50 The Site is wholly encompassed by sub-area PW8, which covers an area of 199.8ha.

4.51 In terms of Small and Medium scale development the sub-area has been assessed to have a Medium-Low, Medium and Medium-High sensitivity to these development typologies. The sub-area is judged to have a Medium-High and High sensitivity to Large scale development.

4.52 The explanatory text (page 60) to accompany the sensitivity ratings states that:

"Large-scale arable farmland is not a valued landscape in the context of the wider Low Weald, but lack of settlement across most of this area, and expansive views towards higher ground from the more open locations, mean that it retains a functional rural character and relationship with the wider landscape despite its visible proximity to Paddock Wood. The area as a whole also plays an important role in preserving separation from Five Oak Green and linear development extending out eastwards from it. Sensitivity across most of the sub-area is therefore ‘medium-high’."
4.53 However, the assessment (page 61) also acknowledges that:

"The breadth of the sub-area means that sensitivity to small or medium-scale development scenarios is 'medium' in close proximity to the north-western edge of Paddock Wood, and 'medium-low' where existing tree lines would provide a degree of containment around an extended settlement edge. Sensitivity to more visible, larger scale development scenarios in these areas would be 'medium-high. Around Eldon Way, where woodland forms a visual screen, and to the south of the railway line, where the historic field pattern is retained and the gap to Five Oak Green is more fragile, there is greater sensitivity, especially to larger scale development scenarios"

4.54 It should be noted that two of the caveats acknowledged in the assessment (page 4) are that any locations for further consideration will require more detailed landscape and visual assessment and also that the assessment is undertaken at 1:25,000 scale and provides a broad character-based assessment, rather than a site level assessment as might be required for a planning application. The findings outlined above provide a broad character-based assessment for sub-area PW8. This LVAGBR provides a more detailed assessment for the Site.

High Weald AONB Management Plan

4.55 The High Weald AONB Management Plan is a statutory document setting out policies for the management of the AONB. The Plan may be applied to the designated area and its 'setting', especially where the setting falls within the High Weald National Character Area (which the Site, for the most part, does not). The AONB 'setting' is defined on page 21 as "areas outside the AONB where development and other activities may affect land within an AONB".

4.56 The High Weald Statement of Significance is outlined on page 23, with five defining components of character as follows:

1) "Geology, landform and water systems – a deeply incised, ridged and faulted landform of clays and sandstone with numerous gill streams.

2) Settlement – dispersed historic settlement including high densities of isolated farmsteads and late Medieval villages...

3) Routeways – a dense network of historic routeways (now roads, tracks and paths).
4) Woodland – abundance of ancient woodland, highly interconnected and in smallholdings.
5) Field and Heath – small, irregular and productive fields, bounded by hedgerows and woods, and typically used for livestock grazing; with distinctive zones of lowland heaths, and inned river valleys.”

4.57 Other qualities and features include "...the wonderful views and scenic beauty of the High Weald with its relative tranquillity”.

4.58 Whilst the Site is located outside the AONB, the following objectives are considered relevant to landscape and visual matters:

Settlement

Objective S2: To protect the historic pattern and character of settlement

“To protect the distinctive character of towns, villages, hamlets and farmsteads and to maintain the hinterlands and other relationships (including separation) between such settlements that contribute to local identity.”

Objective S3: To enhance the architectural quality of the High Weald and ensure development reflects the character of the High Weald in its scale, layout and design

“To protect and enhance the character and quality of buildings in the High Weald, and re-establish the use of local materials as a means of protecting the environment and adding to this distinctiveness.”

Woodland

Objective W1: To maintain the existing extent of woodland and particularly ancient woodland.

“To maintain irreplaceable habitats for biodiversity, to maintain a key component of the cultural landscape, and to maintain contribution to carbon storage.”

Field and heath

Objective FH2: To maintain the pattern of small irregularly shaped fields bounded by hedgerows and woodlands
"To maintain fields and field boundaries that form a part of the habitat mosaic of the High Weald; and to maintain this key component of what is a rare UK survival of an essentially Medieval landscape."

Other qualities

Objective OQ4: To protect and promote the perceptual qualities that people value

"To ensure that the special qualities people value, such as tranquillity, dark skies, sense of naturalness and clean air, are recognised and taken account of in AONB management."

Soundness of Draft Local Plan Policies

4.59 The majority of policies relating to landscape, visual and Green Belt matters in the emerging Local Plan (as set out above) are considered to be sound from a landscape and visual perspective; they are consistent with national policy; they are justified, in that they are based on a proportionate evidence base (as set out within Section 4 and 7 of this report); and they are positively prepared, in that they are consistent with the overall aims of the NPPF (i.e. to achieve sustainable development).

4.60 Policy STR4: Green Belt is consistent with National policy; it states clearly that proposals will be considered against the relevant policy in the NPPF (i.e. those set out in Chapter 13). It is also considered justified, in that it is based on a proportionate, relevant and up-to-date evidence base comprising the Stage 1 and Stage 2 Green Belt Studies (2016) and the Distribution of development Topic Paper (September 2019).

4.61 Policy STR 7: Place Shaping and Design is consistent with National Policy in that it requires architecture and urban design of a high standard which complies with requirements set out in Paragraphs 124-132 of the NPPF. This policy is therefore considered to be sound and in accordance with the NPPF, having particular regard to Section 12 on “Achieving well-designed Places” and Section 15 on 'Conserving and enhancing the natural Environment’. However, to better align with the NPPF Paragraph 127 it is suggested that the wording of point 2 in Policy STR 7 (i.e. “…2. Provide buildings that exhibit individual architectural quality within well considered public and private realms”) is updated to read “Provide buildings that exhibit good architectural quality, within well considered public and private realms”.

4.62 Policy STR 8: Conserving and enhancing the natural, built, and historic environment requires that the natural environment is conserved and enhanced. Specifically, it requires that the urban and rural landscapes of the borough, including the designated High Weald AONB, will be
conserved and enhanced, which is consistent with Paragraph 172 of the NPPF. However, other than that related to the AONB, the use of the term ‘conserve and enhance’ is inconsistent with Paragraph 170 of the NPPF, which states that "Planning policies and decisions should contribute to and enhance the natural and local environment...". As such this policy goes beyond National policy requirements and is considered to be unsound. Therefore, it is recommended that in the introductory passage to Policy STR8 the word ‘conserve’ is replaced by the term ‘contribute to’, to better align with Paragraph 170 of the NPPF (for clarity the word ‘conserve’ should be retained in relation to the AONB to be consistent with Paragraph 172 of the NPPF).

4.63 In regard to landscape this policy STR/PW1: The Strategy for Paddock Wood states that developments must provide natural and semi natural green space and a range of formal and informal open space; and provide strong multi-functional green infrastructure to tie in with the surrounding landscape and to integrate with flood defence measures. This policy is supported by the TWB Green Infrastructure Framework (2019) and complies with requirements set out in Paragraphs 170 and 171 of the NPPF. Therefore it is considered to be sound and in accordance with the NPPF, having particular regard to Section 12 on ‘Achieving well-designed places’ and Section 15 on ‘Conserving and enhancing the natural environment’.

4.64 Policy AL/PW1: Land at Capel and Paddock Wood builds on some of the information included within Policy STR/PW1 (e.g. the provision of multi-functional green infrastructure). It additionally requires that development on the Site embeds several key qualities, including a clear identity and green space. Furthermore, the policy requires that the masterplan shall be informed by detailed studies within and surrounding the allocation that shall include landscape character and visual amenity. In particular it states that attention will be given to the key landscape characteristics, views and the setting of the High Weald AONB. In this regard, Policy AL/PW1 is consistent with Section 12 (Achieving well-designed places) and Section 15 (Conserving and enhancing the natural environment). Furthermore, item 8 of Policy AL/PW1 concerns the provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt, which is consistent with Paragraph 138 of the NPPF.

4.65 The Site falls across parcels 1, 2, 3 and 4 as identified in Policy AL/PW1 of the TWLP, for which a series of opportunities and constraints are provided (Table 4, page 178-182). For parcels 1 and 2 a 25m buffer is required for Whetsted Wood (Ancient Woodland), which goes above and beyond the 15m buffer required by National Guidance (i.e. Natural England and the Forestry Commission standing advice). As such this section of the policy is not consistent with National policy requirements (this is

14 Natural England and the Forestry Commission (2018) Ancient woodland, ancient trees and veteran trees: protecting them from development
discussed further within the ecology chapter) and from a landscape and visual perspective is accordingly considered unsound as it neither justified nor consistent with national policy.

4.66 Policy **EN 1: Design and other development management criteria** requires that development should avoid the loss of important landscape features; respect the characteristics of the site and its relationship with immediate surroundings, including views; and should be compatible with existing buildings, building lines, landscape and treescape, roofscapes, and skylines. It also states that proposals should be accompanied by an integral landscaping (both hard and soft) scheme, which contributes to, and enhances, the natural and local environment, including sympathetic boundary treatments. This policy is considered to be sound in accordance with the NPPF, having particular regard to Section 12 on “Achieving well-designed Places” and Section 15 on Conserving and enhancing the natural environment. However, it is suggested that Item 1 of Section 3 has additional wording added to better align with Policy EN14, such as "1. Existing individual trees, or groups of trees, that contribute positively to the area shall be retained. Where there is an unavoidable loss of trees on site, however, an appropriate number of suitable replacement trees (in terms of species and size) will be required to be planted on site..."

4.67 Policy **EN 14: Trees, Woodlands, Hedges, and Development** states requires that development should not adversely affect important trees, woodlands, and hedgerows; and that where there is an unavoidable loss the planting of an appropriate number of suitable replacement trees (in terms of species and size) will be required. Policy **EN 15: Ancient Woodland and Veteran Trees** similarly requires that loss of these features should not be allowed. These policies are considered to be sound in accordance with the NPPF, having particular regard to Section 15 on Conserving and enhancing the natural environment.

4.68 Policy **EN 16: Green, Grey, and Blue Infrastructure** requires that development should identify and protect existing green, grey, and blue infrastructure; and identify opportunities for new infrastructure where it makes a positive contribution to strengthening and restoring a healthy and integrated network of habitats and green spaces for the benefit of nature, people, and the economy. This policy is considered to be sound, being in accordance with Section 15 of the NPPF on Conserving and enhancing the natural environment, in particular Paragraph 171. Nonetheless, whilst consistent with Paragraph 171, there is clearly an inconsistency with the wording; Paragraph 171 makes no specific mention of either ‘grey’ or ‘blue’ infrastructure.’

4.69 Policy **EN 20: Rural Landscape** requires that development conserve and enhance the borough’s landscape and the special features that contribute positively to the local sense of place; not cause significant harm to the landscape setting of settlements; and restore landscape character where it has been eroded. The use of the term ‘conserve and enhance’ in item 1 of this policy is inconsistent with Paragraph 170 of the NPPF, which states that "Planning policies and decisions should
contribute to and enhance the natural and local environment...”. As such this policy goes beyond National policy requirements and is considered to be unsound. Therefore, it is recommended that the word 'conserve' is replaced in item 1 of Policy EN20 by the term 'contribute to', to better align with Paragraph 170 of the NPPF.

4.70 Policy **EN 21: High Weald Area of Outstanding Natural Beauty (AONB)** requires that development within, or affecting the setting of, the High Weald AONB shall seek to conserve and enhance its landscape and scenic beauty. This policy is therefore considered to be sound in accordance with the NPPF, having particular regard to Section 15 on Conserving and enhancing the natural environment. Paragraph 172 of the NPPF states "Great weight should be given to conserving and enhancing landscape and scenic beauty in ... Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues".

4.71 The overall approach within the Draft Local Plan policies is supported from a landscape and visual perspective, however amendments to certain policies is recommended as set out above. This would ensure robustness in terms of delivering a Plan that is positively prepared, justified, and consistent with National policy and therefore “sound”.
5.0 LANDSCAPE CHARACTER CONTEXT

5.1 The landscape character of the Site and Study Area is described within published Landscape Character Assessments at a range of different scales from national to local. These are supplemented by an assessment of the character of the Site. A comparison of the character of the Site and its surroundings aids the understanding of the contribution that the Site makes to the wider landscape character and value. This, in turn, aids the assessment of the sensitivity to, and the ability to accommodate, new development.

5.2 This chapter identifies the Landscape Character Areas (LCAs) and Landscape Character Types (LCTs) in which the Site and its surroundings are located. The geographical extent of the LCAs and LCTs is shown on Figure 3: Landscape Character Plan. Full extracts of the published LCAs relevant to the Site are contained within Appendix A.1. The key characteristics of each of these landscape character areas and types are summarised below in Table 1: Published Landscape Character Areas Key Characteristics. These are grouped by types of characteristics from a national to local scale to illustrate the extent to which local characteristics are typical of, or rare, at a regional or national level.

National

5.3 The Site is located within NCA 121: Low Weald, a ‘C’ shaped character area of broad low-lying clay valley wrapping around the High Weald NCA. This area is described as predominantly agricultural with pastoral farming due to the soils.

5.4 The key relevant characteristics of NCA 121 are:

- "Broad, low-lying, gently undulating clay vales with outcrops of limestone or sandstone providing local variation;
- …
- A generally pastoral landscape with arable farming associated with lighter soils on higher ground and areas of fruit cultivation in Kent. Land use is predominantly agricultural but with urban influences...;
- Field boundaries of hedgerows and shaws (remnant strips of cleared woodland) enclosing small, irregular fields and linking into small and scattered linear settlements along

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15 Natural England (2013) NCA Profile: 121 Low Weald
roadsides or centred on greens or commons. Rural lanes and tracks with wide grass verges and ditches;

- Small towns and villages are scattered among areas of woodland, permanent grassland and hedgerows on the heavy clay soils where larger 20th-century villages have grown around major transport routes;

- Frequent north–south routeways and lanes, many originating as drove roads, along which livestock were moved to downland grazing or to forests to feed on acorns;

- Small areas of heathland particularly associated with commons ... Also significant historic houses often in parkland or other designed landscapes;

- The Low Weald boasts an intricate mix of woodlands, much of it ancient, including extensive broadleaved oak over hazel and hornbeam coppice, shaws, small field copses and tree groups, and lines of riparian trees along watercourses. Veteran trees are a feature of hedgerows and in fields;

- Many small rivers, streams and watercourses with associated watermeadows and wet woodland;

- Abundance of ponds, some from brick making and quarrying, and hammer and furnace ponds, legacies of the Wealden iron industry;

- Traditional rural vernacular of local brick, weatherboard and tile-hung buildings plus local use of distinctive Horsham slabs as a roofing material. Weatherboard barns are a feature. Oast houses occur in the east and use of flint is notable in the south towards the South Downs”.

County

5.5 The Site is located within the ‘Low Weald Fruit Belt’ Landscape Character Area (LCA) within the Kent Landscape Character Assessment\(^{16}\). This area is described as forming “a large part of the flattest land of the Low Weald” and as “a flat or undulating landscape of predominantly dwarf fruit trees”.

5.6 The key characteristics of the Low Weald Fruit Belt LCA are:

\(^{16}\) Jacobs Babtie (2004) The Landscape Assessment of Kent
5.7 The condition of the LCA is assessed as being good and the sensitivity as being moderate. The summary of actions is to conserve and reinforce.

Local

5.8 Within the Tunbridge Wells Landscape Character Assessment\(^\text{17}\) the Site is entirely situated within the 'Low Weald Farmland' Landscape Character Type (LCT) and the 'Paddock Wood /Five Oak Green’ LCA (LCA 13). The Low Weald Farmland LCT comprises two areas: Paddock Wood and Frittenden to the east. Both are on the northern edge of TWB. LCA 13: Paddock Wood/Five Oak Green is a long narrow character area that broadly follows the South East Main Line.

5.9 The key characteristics of LCA 13 are:

- "Flat or gently undulating land at the footslopes, backed by the adjacent ridge of the High Weald plateau;"
- A mixed farmed landscape with extensive open arable fields, dwarf fruit orchards and pockets of pasture;
- Remnant alder or poplar windbreaks, as well as individual trees and hedges provide vertical elements in this open flat landscape;
- Crossed by a connecting network of rural lanes characterised by broad grass verges and ditches, hedges or trees;
- Large, arable fields drained by a network of ditches;
- Very mixed settlement pattern with extensive suburban development at Paddock Wood and on a smaller scale at Five Oak Green, with the remainder of settlement characterised by dispersed farmsteads and small hamlets;
- A variety of building styles ranging from groups of oasts, which are highly visible, to more modern suburban houses and bungalows; and

\(^{17}\) LUC (2017) Tunbridge Wells Landscape Character Assessment
Open views across this intensively farmed landscape are frequently punctuated by the cows of clustered groups of oast houses and extensive farm building complexes. The Greensand Ridge to the north provides a distinctive skyline, whilst the High Weald to the south provides wooded enclosure.”

5.10 LCA 13 is described as an "important transition between the Fruit Belt and the flat arable pastureland of the Low Weald and the Medway valley from which it derives much of its character”. It is further described as an agricultural landscape with large arable fields and areas of orchard around the built-up area of Paddock Wood.

Table 1: Published Landscape Character Areas Key Characteristics

<table>
<thead>
<tr>
<th>National Study Area and Site</th>
<th>County Land Use</th>
<th>Local Land Use</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>NCA 121: Low Weald</strong></td>
<td><strong>Low Weald Fruit Belt LCA</strong></td>
<td><strong>LCA 13: Paddock Wood</strong></td>
</tr>
<tr>
<td>Broad, low-lying, gently undulating clay vales with outcrops of limestone or sandstone providing local variation.</td>
<td>Flat or gently undulating land at the footslopes, backed by the adjacent ridge of the High Weald plateau.</td>
<td>Generally flat within the Site, rising up to the south to the edge of the High Weald.</td>
</tr>
<tr>
<td>A generally pastoral landscape with arable farming ... on higher ground and areas of fruit cultivation in Kent. Land use is predominantly agricultural but with urban influences...</td>
<td>Farmed landscape of dwarf fruit trees, arable, hops and pasture. Some open fields around floodplains.</td>
<td>A mixed farmed landscape with extensive open arable fields, dwarf fruit orchards and pockets of pasture. Large, arable fields drained by a network of ditches.</td>
</tr>
<tr>
<td>Field boundaries of hedgerows and shaws ... small, irregular fields... Intricate mix of woodlands, much of it ancient, including extensive broadleaved oak over hazel and hornbeam coppice, shaws, small field couses and tree groups, and lines of riparian trees along watercourses.</td>
<td>Remnant alder or poplar windbreaks.</td>
<td>Generally arable farmland in large open fields, particularly in the north. Land to south is smaller in scale and includes areas of orchard planting as the topography rises.</td>
</tr>
<tr>
<td>... Veteran trees are a feature of hedgerows and in fields.</td>
<td>Remnant alder or poplar windbreaks, as well as individual trees and hedges provide vertical elements in this open flat landscape.</td>
<td>Where field boundaries remain, trees are separated by tree belts, possibly remnant shaws. The northern part of the Site is more open with field boundary removal evident, creating large prairie type fields.</td>
</tr>
<tr>
<td>Further to the south, on the higher ground, fields are smaller and separated by hedgerows and areas of woodland.</td>
<td></td>
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<tr>
<td>National</td>
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<tr>
<td>NCA 121: Low Weald</td>
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<tr>
<td>Low Weald Fruit Belt</td>
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<th>Local</th>
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<tbody>
<tr>
<td>LCA 13: Paddock Wood</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Study Area and Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>The A228 Whetsted Road wraps around the western and north-western edge of the Site. The B2017 is located beyond the southern boundary of the Site and meets the A228. Paddock Wood comprises a main north-south road, the B2160, with multiple winding estate roads and cul-de-sacs extending east and west, typical of post-war development.</td>
</tr>
</tbody>
</table>

Rural lanes and tracks with wide grass verges and ditches. Frequent north–south routeways and lanes, many originating as drove roads...

Crossed by a connecting network of rural lanes characterised by broad grass verges and ditches, hedges or trees. Historic drove roads and ironways ran in straight lines in a north-south direction. These lines are today followed by main roads which cross the area.

...small and scattered linear settlements along roadsides or centred on greens or commons. Small towns and villages are scattered among areas of woodland, permanent grassland and hedgerows on the heavy clay soils where larger 20th-century villages have grown around major transport routes.

Visual detractors include the suburban influence of recent development, in particular around Paddock Wood and the railway line.

Very mixed settlement pattern with extensive suburban development at Paddock Wood and on a smaller scale at Five Oak Green, with the remainder of settlement characterised by dispersed farmsteads and small hamlets.

Many small rivers, streams and watercourses with associated water meadows and wet woodland. Abundance of ponds, some from brick making and quarrying, and hammer and furnace ponds, legacies of the Wealden iron industry.

Large, arable fields drained by a network of ditches.

The Tudeley Brook extends north through the Site from the higher ground to the south. This is supplemented by a network of ditches that extend throughout the area.

- Traditional rural vernacular of local brick, weatherboard and tile-hung buildings plus local use of distinctive Frequent oasts.

- A variety of building styles ranging from groups of oasts, which are highly visible, to more modern suburban houses and bungalows.

Paddock Wood displays almost no local vernacular, mainly comprising typical post-war development and industrial land that is not reflective of prevailing settlement character.

- Weatherboard barns are a feature. Oast houses occur in the east and use of flint is notable in the south towards the South Downs.

More traditional farmhouses and isolated dwellings occur around the A228 to the north and west of the Site.
Open views across this intensively farmed landscape are frequently punctuated by the cowls of clustered groups of oast houses and extensive farm building complexes. The Greensand Ridge to the north provides a distinctive skyline, whilst the High Weald to the south provides wooded enclosure.

Degree to Which Site and Surroundings Represent Published Landscape Character

5.11 The Site comprises an area of arable farmland characteristic of the area. The northern part of the Site, however, is subject to large, prairie type fields compared to that which is located south of the railway line. The route of the Tudeley Brook north of the railway line has also been denuded and is not an obvious feature in the landscape, as is also the case with the other open drains. The area south of the railway line is more vegetated, containing more frequent tree belts separating fields and the routes of the streams are marked by trees.

5.12 The north-eastern area is open to the surrounding industrial uses and these are notable detracting elements that influence the character of this area. In the south-east, it is possible to see the post-war residential development within Paddock Wood, rising above the tree line.

5.13 The south of the Site is more reflective of local landscape character, with fields being separated by tree belts and retaining much of its landscape structure. The north of the Site is far more denuded and is more degraded in character, also being influenced by the neighbouring industrial uses and audible noise from traffic on the A228.

5.14 The Site does not contain evidence of smaller field pattern or orchards as outlined in the published character assessments nor the influence of vernacular building types.
Management and Guidance

5.15 Advice and recommendations contained in the Published Landscape Character Assessments are set out within Appendix A.1 and points relevant to the Site are summarised in Table 2: Published Landscape Character Advice and Recommendations below.

Table 2: Published Landscape Character Advice and Recommendations

<table>
<thead>
<tr>
<th>National</th>
<th>County</th>
<th>Local</th>
<th>Study Area and Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>NCA 121: Low Weald</td>
<td>Low Weald Fruit Belt</td>
<td>13: Paddock Wood</td>
<td></td>
</tr>
<tr>
<td>SEO 1: Protect, manage and significantly enhance the area’s intricate and characteristic mix of semi-natural ancient woodlands, gill woodland, shaws, small field copses, hedgerows and individual trees...</td>
<td>Reinforce the suggestion of a more ancient time-depth by managing and replanting mature tree stock within a proportion of the hedges.</td>
<td>Protect and enhance the area of Ancient woodland in the centre of the Site and the tree belts and hedgerows as part of a green infrastructure strategy.</td>
<td></td>
</tr>
<tr>
<td>SEO 3: Work at a landscape scale to improve the quality, state and structure of all Wealden rivers, streams and standing waterbodies and their appropriate flood plains... while seeking to enhance biodiversity... and reinforcing sense of place. ...Opportunities exist to reinforce the riparian character of the NCA by restoring natural river geomorphology and re-linking watercourses to their floodplains by extending areas such as wet meadow and woodland.</td>
<td>Reinforce the natural potential of the area by identifying main watercourses and ditches and managing them to enhance the wildlife interest. Management techniques such as seasonal cutting and piecemeal clearance could extend to the wide roadside verges and drainage ditches.</td>
<td>Protect and enhance the route of the Tudeley Brook, its tributaries and the network of ditches as they pass through the Site. Incorporate the route of the Tudeley Brook as the main spine of a blue/green infrastructure network.</td>
<td></td>
</tr>
<tr>
<td>SEO 4: Maintain the sustainable but productive pastoral landscape of the Low Weald, while expanding and connecting semi-natural habitats...and maintaining the extent and quality of unimproved permanent grassland and meadows. Restore degraded neutral grasslands to buffer sites and encourage pollinators and predators for pest regulation.</td>
<td>Conserve the tranquil, rural settlements and their agricultural setting which is small-medium scale, of intermittent enclosure, well-managed, with the interest of a rich and productive land.</td>
<td>Provide space for new habitats within the proposed masterplan, including meadow grassland.</td>
<td></td>
</tr>
</tbody>
</table>
### National

**NCA 121: Low Weald**

Plan new landscapes within and around predicted growth areas across the region...by encouraging the incorporation of high quality green infrastructure and buffering of zones drawing on the existing strong landscape pattern for example, the incorporation, creation and restoration of traditional shaws and meadows within new development.

### County

**Low Weald Fruit Belt**

Reinforce the enclosure pattern around settlements such as Marden and Collier Street with hedgerow and mature tree planting. Link these with floodplain copses.

### Local

**13: Paddock Wood**

Enhancements should aim to promote sympathetic management of this land to retain its countryside character, particularly in association with development proposals.

New development around the edge of existing settlements should be unobtrusive and tie in with the local landscape character through appropriate planting treatments. It would be beneficial to target landscape enhancements anywhere but most importantly along the transport corridors and settlement margins.

Ensure that any urban/suburban edges are tied into the local landscape through planting (e.g. hedges, shelter belts, small woodland copses and orchards) as well as ensuring an appropriate graduation in scale of.

<table>
<thead>
<tr>
<th>Study Area and Site</th>
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<tbody>
<tr>
<td>Incorporate the existing landscape features and waterways into an integrated network of green and blue infrastructure and open space, forming the framework for the new development. Reinforce and strengthen existing hedgerows and tree belts to provide a substantial Green Infrastructure to Site.</td>
</tr>
</tbody>
</table>

This NCA is a potential ‘Forest District’ as a result of the identified opportunities to create an area of woodland over 5,000 ha covering at least 30 per cent of the area through ‘connecting’ existing woodlands.

### Local

Seek opportunities to provide new small areas of woodland or to expand the existing area of Ancient Woodland.
<table>
<thead>
<tr>
<th>National</th>
<th>County</th>
<th>Local</th>
<th>Study Area and Site</th>
</tr>
</thead>
<tbody>
<tr>
<td>NCA 121: Low Weald</td>
<td>Low Weald Fruit Belt</td>
<td>13: Paddock Wood</td>
<td>Respect the vulnerability of the slopes rising up to the south to new developments/land use change. New developments can be highly visible over a wide area on these slopes and detract from the essential countryside character. Consider the vulnerability of this open lowland landscape to built development which is likely to be very visible in views. Pylons which cross east to west, at the foot of the High Weald slope, are a significant visual detractor within this flat, open landscape. Ensure that larger areas of development are broken up by tree planting, including the retained network of tree belts but also large broad-leafed trees within new areas of open space, along watercourses and within the street scene. Ensure a varied roofline to prevent the impression of mass when viewed from elevated points.</td>
</tr>
</tbody>
</table>
**6.0 VISUAL APPRAISAL**

6.1 A visual appraisal has been undertaken to determine the relationship of the Site with its surroundings and its approximate extent of visibility within the wider landscape from publicly accessible locations. This commenced with a desktop identification of areas of land from which there could be potentially views towards residential development at the Site. This was followed by a site visit to assess the extent of the visual envelope and to confirm the most exposed and contained parts of the Site in visual terms.

6.2 Site visits were undertaken in July 2018 and January 2019 and a number of photographs were taken looking towards the Site. These were narrowed down to a series of Site Context Photographs taken to represent views towards the Site. Photographs were taken from a range of near, middle and long-distance locations, taking into account the topographical variation and designated areas. The visual context of the Site is illustrated by **Site Context Photographs 1 - 12**, the locations of which are shown on **Figure 5: Visual Appraisal Plan**.

**Visual Context**

6.3 Short distance Views from the A228 are generally screened by the dense hedgerow vegetation along the road, as demonstrated by **Site Context Photograph 1** taken from south of the railway line. While glimpsed views into fields through gaps in the hedgerow are obtained from certain static locations, as demonstrated by **Site Context Photograph 2** and **3** (both taken from north of the railway line) these are barely appreciable when travelling along this busy A road.

6.4 Further north, glimpsed views are also possible from isolated parts of Old Whetsted Road, although views from much of this area are restricted by the planting around the boundary of the Site (as demonstrated by **Site Context Photograph 4** and **5**) including that lining the road and surrounding.

6.5 Isolated open and partial near distance views were also possible from isolated locations along the eastern boundary on Maidstone Road (as demonstrated by **Site Context Photograph 6**), although the majority of views from this area are screened by the strong boundary planting and intervening buildings (as demonstrated by **Site Context Photograph 7** and **8**). The most open short distance views are demonstrated by **Site Context Photograph 9**, which is more reflective of the more open and denuded nature of the northern part of the Site.

6.6 Medium distance views are possible from the B2017 into the land to the south of the Site, where the field boundary comprises low hedgerows (as demonstrated by **Site Context Photograph 10**). From this point, it is only possible to see into the southernmost two fields located outside the Site adjacent
to Badsell Road (B2017). A medium distance view to the Site’s southern boundary is also possible from PRoW WT175 (as demonstrated by Site Context Photograph 11) as it extends northwards from Badsell Cottage.

6.7 The area of Paddock Wood and the Site is roughly level and low-lying at between 15 and 21m AOD, resulting in few elevated views from the immediate surroundings. To the south the land rises up to the High Weald, offering potential elevated views over Paddock Wood and the surrounding Low Weald. Despite this, elevated viewpoints are limited due to the well-wooded nature of the higher ground and the few PRoW traversing this area. The most notable view was from the viewing point at Hilltop, 3.5km to the south-east (as demonstrated by Site Context Photograph 12). From this point, the northern parts of the Site can be seen extending beyond and within the context of Paddock Wood with the main part of the Site hidden behind intervening vegetation on the escarpment.

Summary of Visual Appraisal

6.8 Due to the roughly level and low-lying nature of the Site and its containment by strong boundary features - either existing settlement built form or robust tree belt vegetation along the A228 - the visual envelope is localised and limited. Views into the Site are predominantly restricted to near distance views from isolated locations, such as short stretches of the A228 to the west and B2160 to the east. Medium distance views are also possible from the B2017 and PRoW WT175 to the south of the Site, although from these locations it is only possible to see into the southernmost two fields located outside the Site. However, the majority of medium distance views are screened by the intervening layers of vegetation and building and the level topography. Long distance views were limited to isolated locations on the edge of the High Weald escarpment, but these are generally restricted by the vegetated nature of the scarp.
7.0 GREEN BELT REVIEW

Published Green Belt Reviews

Tunbridge Wells Green Belt Study\(^\text{18}\) - Stage 1

7.1 This document takes an overview of the Green Belt and its origins, focussing on the area around Tunbridge Wells. Paragraph 5.24 states that the Green Belt was generally drawn to extend to 15 miles from the edge of Greater London and that the extension as far as Paddock Wood was ‘exceptional’ and was noted as such in the 1983 Kent Countryside Plan.

7.2 Paragraph 5.27 states:

“The fact that the Green Belt does not surround Paddock Wood suggests that preventing its expansion was not a consideration when the Green Belt was designated, other than to limit its westward spread towards Tonbridge or Tunbridge Wells, and whilst the town has expanded since then, principally to the southwest, it is still much smaller than its neighbours to the west.”

7.3 Paragraph 5.33 states:

“For development to relate to a settlement other than Tunbridge Wells or Tonbridge it would need to be located adjacent to one of the inset settlements of Paddock Wood, Five Oak Green or Speldhurst...”

7.4 Paragraph 5.42 acknowledges the large distance between Paddock Wood and Tunbridge Wells and their physical and visual separation.

“Between Paddock Wood and Tunbridge Wells the wooded hills and valleys north of Pembury represent a significant physical and visual separator, and the straight-line gap is almost 6km, but the gap between Paddock Wood and Pembury is just over 4km. The A228 provides the main road link, but both towns are slightly offset from this route. The A228 corridor, on higher ground than the

\(^{18}\) Land Use Consultants (November 2016) Tunbridge Wells Borough Green Belt Strategy Study
surrounding landscape along the southern part of the gap, makes a greater contribution to settlement separation but the gap is large enough for development adjacent to the towns not to compromise it significantly.”

7.5 Paragraph 6.8 acknowledges that the outer boundaries to the Green Belt should follow landscape features:

“In the vicinity of Paddock Wood, where in the absence of Green Belt and AONB designation there has been greater development pressure, there is potentially a stronger case to consider creating an outer boundary that follows physical landscape features.”

7.6 The document recommends Broad Areas and Green Belt Parcels for further study. Those affecting the Site include Broad Areas 3 and 4 (to the south and north of the railway line respectively) and Green Belt Parcel PW1 which mainly comprises land in the south-eastern corner of the Site and a narrow area to the south of the B2017.

Tunbridge Wells Green Belt Study\textsuperscript{19} - Stage 2

7.7 The Stage 2 document assesses each of the identified Broad Areas and Green Belt Parcels from Stage 1 and assesses them against their contribution to the Green Belt on a scale from high to low. An overall score was then given as to the harm that would be caused by the release of the Green Belt land on a 5-point scale from very high to very low.

7.8 In the assessment of the Broad Areas (Table 6.1, page 28), all 10 were given a harm rating of very high. Green Belt Parcel PW1 was given a harm rating of moderate. Only one parcel was given a rating of low and none were given a rating of very low.

7.9 Broad Area 3 was assessed as making a strong contribution to purposes 1, 2 and 3, i.e. preventing sprawl, preventing merging and protecting the countryside from encroachment.

7.10 The assessment for BA3 (Appendix A – Broad Areas) acknowledges the separating feature of the A228.

\textsuperscript{19} Land Use Consultants (November 2016) Tunbridge Wells Borough Green Belt Strategy Study
7.11 Broad Area 4 was assessed as making a strong contribution to purposes 2 and 3 and a ‘relatively weak’ contribution to purpose 1.

7.12 Neither Broad Area was assessed as contributing to the protection of the setting of a historic town.

7.13 Area PW1 was assessed as making a weak contribution to purpose 1, a ‘relatively weak’ contribution to purpose 2, a moderate contribution to purpose 3 and a weak or no contribution to purpose 4.

7.14 It should be noted that BA 3 and BA4 are large strategic areas, and that the consideration of the Site in its own right would result in lower levels of harm. This is also supported by the findings for PW1, which is a much smaller parcel of land on the western edge of Paddock Wood. If this land is assessed as making a weak contribution to preventing sprawl and a ‘relatively weak’ contribution to preventing merging, then the remainder of the Site cannot be assessed as notably different (as demonstrated in the BW Green Belt Review below).

Distribution of development Topic Paper (September 2019)

7.15 This Topic Paper explains the background to the proposed ‘Development Strategy’ in Section 4 of the TWLP. Particular consideration is given to the potential to accommodate development needs within the borough without undue impacts on the functioning and purposes of the Green Belt and the defining characteristics of the High Weald AONB, and without exacerbating flood risk. The report is designed to be read in conjunction with other evidence base documents, including the Stage 1 and 2 Green Belt Study.

7.16 The suitability of land at Capel and Paddock Wood for a new settlement and significant expansion is considered against paragraph 72 of the NPPF in Table 3 (page 27-30). In regard to part (e) of paragraph 72 (i.e. consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size) it is noted that "Consideration has been given to the provision of additional green belt to the east of Paddock Wood. However, given that the A228 would provide a defined physical boundary which is readily recognisable and likely to be permanent".

7.17 Section F of the report provides further consideration of development potential in the Green Belt. The assessment carried out to identify land in the Green Belt for release is described as following a three stage process: the Green Belt Study identified and assessed both ‘broad areas’ and smaller ‘parcels’ of land; and this was followed by a detailed assessment of individual sites using the outcomes and

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recommendations of the Green Belt Study as part of the wider site assessment carried out for all sites through the SHELAA process.

7.18 Paragraph 6.60 states:

"having undertaken this process, the Council considers that there are exceptional circumstances to alter the boundaries of the Green Belt to remove land from the designation in order to enable the Local Plan to include proposals for development in the Green Belt that fall under the following headings:

* Release of areas of land at Paddock Wood (located within the eastern part of Capel parish, Allocation Policy AL/CA3 and AL/PW1) ... for a wide range of land uses, including built development to deliver strategic development opportunities.
* ...

7.19 It goes on to note:

"The land to be released from the Green Belt at Paddock Wood is part of a wider release of non Green Belt land to deliver development in a sustainable location; approximately 48% of the total area of land included in Policies AL/PW1 and AL/CA3 is currently designated as Green Belt. The masterplans and detailed design process for Policies AL/CA3, AL/PW1 ... will create open space and improve existing, or deliver new, landscape buffers ... within the new developments to ensure the openness of the surrounding areas remaining within the Green Belt is not compromised... Provision of compensatory improvements to the environmental quality and accessibility of remaining Green Belt within the locality shall be made, to be agreed and secured through the masterplanning approach;"

**Contribution of the Site to the Green Belt**

7.20 Barton Willmore has undertaken their own assessment of the contribution made by the Site to the Green Belt.
The Site is situated on the western edge of Paddock Wood, between the existing built edge and the A228, a major roadway bordered by strong hedgerow planting creating strong local visual enclosure. The south-western corner of the Site is situated approximately 1km from the edge of Five Oak Green and is nearly 6km from the edge of Tunbridge Wells and 4km from Pembury.

The findings of the review are set out below:

<table>
<thead>
<tr>
<th>Purpose</th>
<th>Critique</th>
<th>Contribution</th>
</tr>
</thead>
<tbody>
<tr>
<td>Check the unrestricted sprawl of large built-up areas</td>
<td>Green Belt boundaries should, as set out within the NPPF, &quot;define boundaries clearly, using physical features that are readily recognisable and likely to be permanent&quot;. The A228 is the largest and most permanent physical feature in the locality and would be the most logical and defensible boundary to the west and north-west. It is this that would contain development and prevent sprawl extending any further west. Moreover, the Site is contained by dense tree belts, hedgerows and woodland blocks, which would serve to visually contain built forms and thus further diminish any potential perceived sense of sprawl.</td>
<td>Limited</td>
</tr>
<tr>
<td>Prevent neighbouring towns from merging</td>
<td>The criterion within the NPPF refers to ‘towns’, not villages. The nearest town to Paddock Wood is Tunbridge Wells which is, as is acknowledged in the Tunbridge Wells Green Belt Study, 6km from Paddock Wood and separated by the intervening wooded hills and valleys north of Pembury. Development within the Site will not physically or perceptually reduce the separation between towns.</td>
<td>Limited to None</td>
</tr>
<tr>
<td>Assist in safeguarding the countryside from encroachment</td>
<td>Any development on undeveloped Green Belt land will undoubtedly result in physical encroachment into the countryside. The only distinction between greenfield sites, therefore, is the degree of perception of encroachment. The visual appraisal has demonstrated that the Site is strongly enclosed physically and visually from the west, and that views are limited from the south due to strong vegetation on the lower slopes of the escarpment. Developing the Site will result in only a slight perception of encroachment.</td>
<td>Limited</td>
</tr>
<tr>
<td>Preserve the setting and special character of historic towns</td>
<td>Paddock Wood is not a historic town; and the Site is over 6km from Tunbridge Wells, separated from it by wooded hills and valleys, meaning they have no physical, visual or character connection.</td>
<td>None</td>
</tr>
</tbody>
</table>

Characteristics of the Green Belt

The NPPF states that the key characteristics of the Green Belt are "their openness and their permanence". As demonstrated in the Table above, due to the Site comprising predominantly open arable land and grassland with a general lack of built and engineered forms, it is considered to be inherently open. Whilst residential development would have a pronounced effect on the sense of openness within the Site itself, it would not significantly impact upon the sense of openness in the wider agricultural landscape. This is due to the Site’s strong degree of physical and visual containment, which would limit the visual presence and urbanising influence of development, and the existing influence of built development adjoining the Site. Any development would appear as a coherent extension to the existing settlement pattern, rather than being perceived as unmanaged
sprawl, and would be in keeping with the urbanised character of the adjacent areas of Paddock Wood to the east.

7.24 The western and north-western boundary to the Site is formed by the A228 (Maidstone Road and Whetsted Road), which is a physical feature that will likely remain well beyond the next Local Plan period. On this basis the Site is considered to have robust and defensible boundary to the west. This is noted within the Distribution of development Topic Paper (September 2019), which states "the A228 would provide a defined physical boundary which is readily recognisable and likely to be permanent".

7.25 Given the above, the release of the Site from the Green Belt offers the potential to consolidate the settlement pattern and redefine the boundary of the Green Belt to defensible and permanent features, i.e. an existing A road. Should the Site be released from the Green Belt and subsequently developed, the openness and essential characteristics of the remaining designated area would remain intact.

7.26 On this basis, development of the Site would not compromise the purposes and function of the remaining Green Belt and accordingly should be released from the Green Belt. It is considered that the Site should be retained as a housing allocation (AL/PW1) within the emerging Local Plan, as suggested within the Distribution of development Topic Paper (September 2019).
8.0 OPPORTUNITIES AND CONSTRAINTS TO DEVELOPMENT

8.1 The Site benefits from strong physical and visual enclosure as a result of the A228, the western built up edge of Paddock Wood and strong vegetated boundaries of woodland and tree belts. It also retains some landscape features such as Ancient Woodland, particularly within the southern part of the Site. These robust features need to be retained and enhanced as part of an integrated green-blue infrastructure.

8.2 The following features and considerations should be taken into account in any future masterplan:

- Protect and enhance the woodland, tree belts and good quality individual trees within the Site and make provision for the creation of an age structure within the tree species through the planting of new appropriate species.
- Seek opportunities to extend the existing woodland or planting new areas of broad-leaved native woodland.
- Protect, reinforce with hedgerow trees and enhance the hedgerows along the boundaries within the Site.
- Seek opportunities to plant new native broad-leaved trees throughout the Site.
- Create a positive frontage to the B2160 where open in the north-east with additional planting to provide a reinforced green infrastructure to this part of the Site boundary.
- Preserve the rural character of Old Whetsted Road to the north-west by reinforcing the boundary vegetation.
- Protect and enhance the route of the Tudeley Brook and its tributaries, by using this asset of the Site as the mainstay of a connected green and blue infrastructure network, as well as provide the opportunity to enhance the pedestrian experience adjacent to it.
- Reinforce the pedestrian experience along the north-south open drain and create the opportunity to enhance the biodiversity enhancement opportunities.
- Plant trees along the route of the Tudeley Brook to mark its course.
- Create lower density development around the edges of the proposed development parcels to allow for positive frontage onto the green boundaries and;
- reinforce the separation of development parcels and the existing settlement boundary through the use of planting, thereby reinforcing and strengthening the Green Infrastructure of the Site.
- Seek opportunities to improve connectivity and permeability with the existing settlement to the east and the footpath connections to the west and north-west.
- Protect the route of the PRoWs as they pass through the Site and seek to enhance their setting as part of the green blue infrastructure network.
- Provide areas of public open space and the opportunity for wildflower meadow grassland.
• Provide an enhanced pedestrian green corridor adjacent to the ancient woodland in the southern part of the Site.
• Promote development north of the railway line so as not to provide a conflict with the railway line.

8.3 The Site falls across parcels 1, 2, 3 and 4 as identified in Policy AL/PW1 of the TWLP. Table 4 (page 178-182) provides a series of opportunities and constraints for the parcels as follows:

"1 (South West parcel)"
"...

Topography/landscape and visual impact
....
• Sensitivity assessment indicates capacity for housing and small scale commercial development. Detailed landscape and visual assessment required to determine sensitivities around long range views and landscape features.
• Hedging and trees to be largely retained along A228 Maidstone Rd boundary.
• Internal hedging and tree belts along field boundaries to influence layout.
• Whetsted Wood (Ancient Woodland, with 25m buffer) adj to railway line will serve as a constraint to development.
• Need for development to be set back from Badsell Rd."
...

2 (North West parcel)
"...

Topography/landscape and visual impact
....
• Sensitivity assessment indicates capacity for housing and small scale commercial development. Detailed landscape and visual assessment required to determine sensitivities around long range views and landscape features.
• Hedging along A228 Maidstone Rd boundary is an important feature: to be retained and enhanced.
• Whetsted Wood (Ancient Woodland, with 25m buffer) adj to railway line will serve as a constraint to development.
• There will be a need for noise and green buffers to A228 Maidstone Rd.

• Need for development to be set back from Maidstone Rd/Whetsted Rd to reduce visual impact of development on countryside.

..."

3 (North Central parcel)

"...

Topography/landscape and visual impact

....

• Sensitivity assessment indicates capacity for housing and small scale commercial development. Detailed Landscape and visual assessment required to determine sensitivities around long range views and landscape features.

• Noise and green buffers to A228 Whetsted Rd.

• Need for development to be set back from Whetsted Rd to reduce visual impact of development on countryside.

..."

4 (North West Central parcel)

..."Topography/landscape and visual impact

....

• Sensitivity assessment indicates capacity for housing and small scale commercial and economic development. Detailed Landscape and visual assessment required to determine sensitivities around long range views and landscape features.

..."
9.0 SUMMARY AND CONCLUSION

9.1 The is situated within the Kentish Low Weald, a low-lying area to the north of the Kentish High Weald. The Site is bordered along the majority of the eastern boundary by the edge of Paddock Wood, comprising primarily residential development in the south and industrial uses in the north. The north-western and western boundaries are predominantly formed by the A228 Maidstone Road, beyond which is settled countryside. The northern boundary is defined in part by Old Whetsted Road and the field boundary to Hamlet Cottages as well as an east-west field boundary comprising a drain to the north of Leys Cottages. The southern boundary is defined by a ditch and field boundary along its western extent and PROW WT175 along its eastern extent. Beyond the southern boundary, the land comprises settled farmland, rising southwards beyond the B2017 towards the well-wooded High Weald AONB. The eastern boundary is defined in two parts: The northern section is defined in part by Maidstone Road and field boundaries which surround the Garden Centre north of and including Durrant’s Farm; and the southern section is defined by the existing western built up edge of Paddock Wood. The majority of the Site is located within the very outer edge of the London Metropolitan Green Belt.

9.2 The land rises up from below 15m AOD (Above Ordnance Datum) in the north to over 105m in the south in the High Weald. The majority of the Study Area is situated at below 25m AOD, albeit with a steep incline to the south as the land rises to form the northern escarpment of the High Weald. Paddock Wood itself is situated between 15m AOD in the north and 25m AOD along its southern edges.

9.3 The Site itself occupies land that gradually rises from between just below 15m AOD in the north to between 18 and 20m AOD in the south, and as a result appears generally level. The Tudeley Brook flows through the Site, extending from the centre of the southern boundary, along the eastern boundary (between the Site and the neighbouring industrial areas), and through the centre of the northern area of the Site. Other open drains extend through the Site, predominantly along the edges of fields forming part of the wider connected network of water courses.

9.4 The Study Area in general is made up of small to medium sized irregular fields separated by hedgerows and tree belts. Large blocks of woodland occur throughout the Study Area, particularly on the higher ground to the south and in smaller areas along the route of the Medway.

9.5 The Ancient Woodland of Whetsted Wood is situated in the southern part of the Site, separated by the railway line. To the south of the railway line and beyond the southern boundary of the Site, the field pattern is more intact, with fields separated by belts of mature trees.
9.6 The Site is not within the AONB or within the Special Landscape Area (SLA), as defined by Tunbridge Wells Borough Local Plan (2006). The Site makes a limited contribution to the purposes of the Green Belt.

9.7 The main road through the area is the A228 Maidstone Road, which extends broadly from the south-western corner of the Study Area towards the north and which forms the western and north-western boundaries of the Site. The B2160 also extends from the south of the Study Area to the north and passes through the centre of Paddock Wood, forming the northern part of the eastern boundary.

9.8 There is an extensive network of Public Rights of Way (PROW) within the Study Area, except for the north-eastern area, east of the Medway Valley Line and north of the South Eastern Main Line. PROW WT175 extends north to south through the Site, broadly following the route of the Tudeley Brook. This is crossed by WT179 and WT176, both of which extend east to west from the A228 to the west through to the centre of Paddock Wood in the east.

9.9 Due to the roughly level and low-lying nature of the Site and its containment by strong boundary features - either existing settlement built form or robust tree belt vegetation along the A228 - the visual envelope is localised and limited. Views into the Site are predominantly restricted to near distance views from isolated locations, such as short stretches of the A228 to the west and B2160 to the east. Medium distance views are also possible from the B2017 and PROW WT175 to the south of the Site, although from these locations it is only possible to see into the southernmost two fields located outside the Site. However, the majority of medium distance views are screened by the intervening layers of vegetation and building and the level topography. Long distance views were limited to isolated locations on the edge of the High Weald escarpment, but these are generally restricted by the vegetated nature of the scarp.

9.10 The Site benefits from strong physical and visual enclosure as a result of the A228, the western built up edge of Paddock Wood and strong vegetated boundaries of woodland, tree belts and hedgerows. This provides a strong landscape infrastructure within the Site with the most important features being the Ancient woodland Whetsted Wood which is separated by the mainline railway. The tree belts which surround and define field parcels and PROW and the network of streams and open ditches should be incorporated into a connected network of green and blue infrastructure that builds on and enhances the rights of way network and reinforces the Green Infrastructure of the Site. These robust features need to be retained and provide the opportunity for an enhanced integrated green-blue infrastructure.

9.11 The Site makes a Limited contribution to the first purpose of the Green Belt (i.e. Check the unrestricted sprawl of large built-up areas), as the A228 is the largest and most permanent physical feature in the locality and would be the most logical and defensible boundary to the A228 west and
north-west. This would contain development and prevent sprawl extending any further west. Moreover, the Site is contained by dense tree belts, hedgerows and woodland blocks, which would serve to visually contain built forms and thus further diminish any potential perceived sense of sprawl.

9.12 The Site makes a Limited to None contribution to the second purpose of the Green Belt (i.e. Prevent neighbouring towns from merging into one another), as the nearest town to Paddock Wood is Tunbridge Wells which is, as is acknowledged in the Tunbridge Wells Green Belt Study, 6km from Paddock Wood and separated by the intervening wooded hills and valleys north of Pembury. Development within the Site will not physically or perceptually reduce the separation between towns.

9.13 The Site retains a perception of being predominantly undeveloped, as it currently comprises open agricultural land. The only distinction between greenfield sites, therefore, is the degree of perception of encroachment. The visual appraisal has demonstrated that the Site is strongly enclosed physically and visually from the west, and that views are limited from the south due to strong vegetation on the lower slopes of the escarpment. Developing the Site will not result in only a slight the perception of encroachment.

9.14 The Site makes no contribution to the fourth purpose (i.e. Preserve the setting and special character of historic towns), as Paddock Wood is not an historic town and the Site is over 6km from Tunbridge Wells, separated from it by wooded hills and valleys meaning they have no physical, visual or character connection.

9.15 Whilst residential development would have a pronounced effect on the sense of openness within the Site itself, it would not significantly impact upon the sense of openness in the wider surrounding agricultural landscape. This is due to the Site’s strong degree of physical and visual containment, which would limit the visual presence and urbanising influence of development, and the existing influence of built development adjoining the Site. Any development would appear as a coherent extension to the existing settlement pattern, rather than being perceived as unmanaged sprawl, and would be in keeping with the urbanised character of the adjacent areas of Paddock Wood to the east.

9.16 In conclusion, residential development could be effectively assimilated at the Site without compromising the purposes of the Green Belt designation. Accordingly, it is considered that it should be released from the Green Belt and retained as a housing allocation (AL/PW1: Land at Capel and Paddock Wood) within the emerging Local Plan.

9.17 In regard to the Regulation 18 Draft Local Plan, the majority of policies relating to landscape, visual and Green Belt matters are considered to be sound from a landscape and visual perspective; they are consistent with national policy; they are justified, in that they are based on a proportionate evidence
base (as set out within Section 4 and 7 of this report); and they are positively prepared, in that they are consistent with the overall aims of the NPPF (i.e. to achieve sustainable development).

9.18 The overall approach within the Draft Local Plan policies is supported from a landscape and visual perspective, however amendments to certain policies is recommended as set out above. This would ensure robustness in terms of delivering a Plan that is positively prepared, justified, and consistent with National policy and therefore “sound”.