

LAND AT HUBBLE'S FARM AND SOUTH OF HASTINGS ROAD, PEMBURY

TUNBRIDGE WELLS BOROUGH COUNCIL LOCAL PLAN 2035
REGULATION 18 CONSULTATION STAGE

DRAFT POLICY AL/PE 2

LANDSCAPE AND VISUAL APPRAISAL

on behalf of Obsidian Strategic Ltd

November 2019

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1.0 INTRODUCTION

- 1.1 Enplan (planning, landscape and environmental consultants) were appointed in August 2017 by Obsidian Strategic to undertake a preliminary landscape and visual impact appraisal of land at Hubble's Farm, Pembury (refer to Figure 1 for the site's location) to inform their submissions to the Tunbridge Wells Borough Council Local Plan Issues & Options consultation stage. The related report prepared in November 2017 set out a preliminary assessment of the potential landscape and visual effects of developing the land for residential use at Hubble's Farm. The report defined the existing landscape conditions, assesses the character and quality of the landscape and analyses the visual and landscape effects of the proposal. The report also considers a sketch concept of a potential site layout at that time.
- 1.2 This report is an updated version of the November 2017 report, submitted as part of the Council's Local Plan Regulation 18 Consultation Stage, with the assessment revised to take account of a revised set of outline proposals that reflect, amongst various detailed changes, the Council's intention to safeguard some of the original land for uses other than residential.
- 1.3 The baseline position against which this assessment has been undertaken is as per the current position on the ground. There are no extant planning permissions for the land.
- 1.4 The Study Area for this assessment has been defined to incorporate all parts of the landscape that potentially may have a view of the proposals (referred to later in this chapter as the Zone of Theoretical Visibility or ZTV) and is a slightly wider area that is sufficient in size to define the broad landscape context of the site.
- 1.5 Assessments undertaken within this appraisal have been undertaken in accordance with the 3rd Edition of '*Guidelines for Landscape and Visual Impact Assessment*'¹ (GLVIA3). The assessment and landscape design work has been led by Philip Russell-Vick DipLA CMLI, Landscape Director of Enplan and a Chartered Landscape Architect with over 30 years' experience.
- 1.6 The site lies to the immediate south of Pembury village (refer to Figure 1). It comprises the main house and garden, ancillary buildings, equestrian facilities, including a sand

¹ Landscape Institute, Guidelines for Landscape and Visual Impact Assessment 3rd Edition, 17 April 2013

school, a walker, stabling, barns as well as 6-7 grazing paddocks. In all the site amounts to around 5 hectares in area. A further house that fronts onto Hastings Road is also within the site. This together with the existing Hubble's Farm access drive would provide the potential for a wider access to the site for a more significant residential development. The site, excluding the main house and farm buildings, is within the High Weald Area of Outstanding Natural Beauty (AONB), as is the adjoining countryside, but the built-up area of Pembury is outside of the designation (refer to Figure 2). The area around Pembury is also currently in the Green Belt although through the allocation of the site (draft Policy AL/PE 2), the Council propose to release this land from the Green Belt.

2.0 LANDSCAPE RELATED PLANNING POLICY CONTEXT

2.1 This section describes the background of relevant national, regional and local planning policies, in so far as they relate to landscape matters, against which the development proposals will be determined. The site lies in countryside, immediately adjoining the south side of the village of Pembury is in the Green Belt and is partly within the High Weald AONB (refer to Figure 2).

National Planning Policy Framework

- 2.2 The Framework defines three overarching objectives for the planning system to contribute to achieving sustainable development; these are economic, social and environmental. For the environmental objective, at Paragraph 8(c), the planning system should contribute to protecting and enhancing the natural, built and historic environment.
- 2.3 Within Section 15 "*Conserving and enhancing the natural environment*", paragraph 170 requires that the planning policies and decisions contribute to and enhance the natural and local environment by, inter alia, "*protecting and enhancing valued landscapes...*" and by "*recognising the intrinsic character and beauty of the countryside*". Paragraph 172 accords great weight to the conservation and enhancement of scenic beauty in protected landscapes, such as National Parks and Areas of Outstanding Natural Beauty, highlighting that such landscapes have the "*highest status of protection in relation to these issues*". The Framework, therefore, seeks the protection and enhancement of landscapes/countryside whether designated, valued or otherwise but distinguishes those that are "*valued*", from those that are not, and attaches greater weight to those that are designated.
- 2.4 Within the NPPF Section 12 "*Achieving well-designed places*", Paragraph 127 requires that planning decisions should ensure that developments add to the overall quality of the area, are visually attractive as a result of good layout, are sympathetic to local character, including the surrounding built environment and landscape setting, establish 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.

Local Plan

- 2.5 The Development Plan for Tunbridge Wells Borough Council (TWBC) comprises the Saved Local Plan 2006 policies, Core Strategy 2010 and Site Allocations Local Plan 2016. Work on a new Local Plan is currently at the Regulation 18 Consultation stage and the Plan will guide future development in the borough up to 2035.
- 2.6 The new Local Plan, when adopted, will replace the Saved Local Plan 2006 policies, Core Strategy 2010 and associated Development Plan Documents (DPDs).

Current Development Plan

- 2.7 The Tunbridge Wells Local Plan (adopted March 2006) provides local planning policies to provide for both change and conservation in the borough. Since its adoption some changes have been made to the Local Plan as a result of the 'saving' of policies in March 2009, the adoption of the Core Strategy in June 2010 and the adoption of the Site Allocations Local Plan in July 2016. As a result, some policies have been removed from the Local Plan as they are no longer valid.
- 2.8 TWBC adopted its Core Strategy in June 2010. This sets out the broad strategy for future planning and decision making and defines the general locations and levels of development in the borough to 2026 but does not identify individual sites.
- 2.9 A Site Allocations DPD identifies sites to provide for the level of development set out in the Core Strategy. The Site Allocations DPD sets out detailed site-specific policies and looks to 2026, the same period as the Core Strategy.

Emerging Local Plan

- 2.10 TWBC have prepared various evidence-based documents to support the new Local Plan including these below that are relevant to this appraisal:
- An updated Landscape Character Assessment (completed 2017);
 - A Landscape Sensitivity Assessment of Countryside around Tunbridge Wells² (completed 2017); and
 - Tunbridge Wells Green Belt Study Stage Two³ (completed 2017).

² http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0004/145255/TWBC-Landscape-Sensitivity-Assessment-Report-Main-Report.pdf

³ http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0018/151083/Tunbridge-Wells-Green-Belt-Stage-2.pdf

Landscape Sensitivity Assessment of Countryside around Tunbridge Wells

- 2.11 The purpose of this study was to provide an assessment of the extent to which the character and quality of the landscape within the countryside around Tunbridge Wells and Pembury is, in principle, susceptible to change as a result of introducing particular types of development into certain landscape character areas. The study divides this area into a number of sub-areas for the purpose of the assessment. The area between Pembury and the A21 Pembury Bypass, which includes the site, is area Pe8⁴.
- 2.12 The sensitivity assessment concludes for area Pe8 as follows:

“.....Assuming that tree cover along the southern edges of the sub-area is retained/enhanced, so there is no significant change in the extent of visibility of built development in views from the A21 or further south, overall sensitivity to small-scale development is medium where the landform rises above Pembury, and therefore makes a stronger contribution to settlement setting and views from further north, and medium-low at the western end of the sub-area.”

- 2.13 Of the sub-areas assessed two were considered to be of *medium-low* sensitivity (Pe3 and Sp13) to the development of two and two and a half-storey residential dwellings, i.e. less sensitive than Pe8. Sub-area Pe8 is the only area with a *medium* to *medium-low* assessment, all of the remaining sub-areas are *medium* or greater sensitivity.

Tunbridge Wells Green Belt Study Stage Two

- 2.14 The purpose of the study is to review parcels of land within and adjacent to the Green Belt around the settlements of the Tunbridge Wells borough. The assessment is undertaken in relation to the contribution that these parcels make to the five purposes of Green Belt, as defined in the National Planning Policy Framework and seeks to establish the extent to which these areas fulfil these purposes.
- 2.15 The Green Belt study considered that for parcel PE1 (i.e. the land between Pembury village and the A21 bypass, including the site) the A21 would represent a stronger boundary than the existing settlement edge and that it contributed “*relatively weakly*” to

⁴ http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0005/145256/TWBC-Landscape-Sensitivity-Assessment-Report-Sub-Area-Assessments-Part-1.pdf

four of the five purposes, the fifth purpose not being relevant⁵. Overall, the potential level of harm to the Green Belt associated with the release of parcel PE1 is considered to be *low*.

Draft Policy AL/PE 2

- 2.16 TWBC Regulation 18 Consultation Draft Local Plan includes a draft allocation of the Hubble's Farm site, reference Policy AL/PE 2, for residential development providing approximately 90 dwellings. The policy sets out a number of requirements including the scope to enhance tree coverage along the southern edge, no built development within 40m of the vegetated edge with the A21 (for noise purposes), retention and enhancement of on-site hedges, no built development to be located south of the cemetery (safeguarded for future cemetery use) and provision of On-site amenity/natural green space and children's play space.
- 2.17 TWBC propose to release the land from the Green Belt to allow for its development. The site will, however, remain within the AONB.

High Weald AONB Management Plan

- 2.18 The '*English National Parks and the Broads UK Government Vision and Circular 2010*', published by DEFRA, provides policy guidance for local planning authorities, others with statutory functions and those with roles in the management of such areas. The Countryside and Rights of Way Act 2000 requires relevant local authorities to jointly prepare, publish and subsequently review a Management Plan for AONBs. It requires that these plans formulate their policies for the management of the designated landscape and for the carrying out of their functions in relation to it. Management Plans are adopted by local planning authorities but whilst they do not constitute land use planning policies as such, they are a component of plan-making and the decision-making process of planning applications. The status of the AONB Management Plans means that their policies are a material consideration and should be afforded considerable weight when determining planning applications for proposals which affect the AONB. The National Planning Practice Guidance confirms this⁶, and supports the principle that they should be taken into account by local planning authorities in making Local Plans and when considering planning applications.

⁵ http://www.tunbridgewells.gov.uk/_data/assets/pdf_file/0020/151085/Appendix-A-Pembury-Five-Oak-Green-Paddock-Wood.pdf

⁶ National Planning Practice Guidance: Natural Environment: Landscape: Paragraph 4

- 2.19 The High Weald AONB Management Plan 2019-2024 (4th Edition)⁷ sets out the policy aspirations and framework for the 15 authorities jointly responsible for the management of the AONB. The Management Plan sets out a Statement of Significance for the AONB (page 23 of the document) and defines five components of character that make the High Weald a recognisable, distinct and homogenous area. These include the following; (1) Geology, Landform, Water Systems and Climate, (2) Settlement, (3) Routeways, (4) Woodland and (5) Field and Heath. Its outstanding beauty is considered to stem from its *“essentially rural and human scale character, with a high proportion of natural surfaces and the story of its past visible throughout”*.

⁷ The High Weald Area of Outstanding Natural Beauty Management Plan 2019-2024, published by the High Weald Joint Advisory Committee, 2019.

3.0 LANDSCAPE CONTEXT

Published Landscape Character Assessments

3.1 The relevant published landscape character data and related assessments include the following:

- National Character Area Profile: High Weald (NCA 122)⁸;
- ‘The High Weald: Exploring the Landscape of the Area of Outstanding Natural Beauty’, 1994⁹, Countryside Commission: Western High Weald; and
- Tunbridge Wells Borough Landscape Character Assessment 2017¹⁰.

National Context

3.2 At a national level the application site lies within National Character Area (NCA) 122 High Weald. The key characteristics, relevant to this assessment, are defined as:

- *“A faulted landform of clays, sand and soft sandstones with outcrops of fissured sandrock and ridges running east–west, deeply incised and intersected with numerous gill streams forming the headwaters of a number of the major rivers – the Rother, Brede, Ouse and Medway – which flow in broad valleys.....*
- *A dispersed settlement pattern of hamlets and scattered farmsteads and medieval ridgetop villages founded on trade and non-agricultural rural industries, with a dominance of timber- framed buildings with steep roofs often hipped or half-hipped, and an extremely high survival rate of farm buildings dating from the 17th century or earlier.*
- *Ancient routeways in the form of ridgetop roads and a dense system of radiating droveways, often narrow, deeply sunken and edged with trees and wild flower-rich verges and boundary banks. Church towers and spires on the ridges are an important local landmark. There is a dense network of small, narrow and winding lanes, often sunken and enclosed by high hedgerows or woodland strips. The area includes several large towns such as Tunbridge Wells, Crowborough, Battle and Heathfield and is closely*

⁸ <http://publications.naturalengland.org.uk/file/5851972632576000>

⁹ <http://www.highweald.org/downloads/publications/uk-landscape-research-reports/2011-high-weald-landscape-character-assessments-1994/file.html>

¹⁰ <http://ndp.goudhurst.co.uk/wp-content/uploads/2017/04/Tunbridge-Wells-Borough-Landscape-Character-Assessment-2017.pdf>

bordered by others such as Crawley, East Grinstead, Hastings and Horsham.

- *An intimate, hidden and small-scale landscape with glimpses of far reaching views, giving a sense of remoteness and tranquillity yet concealing the highest density of timber-framed buildings anywhere in Europe amidst lanes and paths.*
- *Strong feeling of remoteness due to very rural, wooded character. A great extent of interconnected ancient woods, steep-sided gill woodlands, wooded heaths and shaws in generally small holdings with extensive archaeology and evidence of long-term management.*
- *Extensive broadleaved woodland cover with a very high proportion of ancient woodland with high forest, small woods and shaws, plus steep valleys with gill woodland.*
- *Small and medium-sized irregularly shaped fields enclosed by a network of hedgerows and wooded shaws, predominantly of medieval origin and managed historically as a mosaic of small agricultural holdings typically used for livestock grazing.....”*

Regional and Borough Context

- 3.2 A number of landscape character assessments have been carried out over the years for the borough and county with the most relevant prepared for the emerging Local Plan in 2017. This provides a number of distinctive character areas as illustrated at Figure 3 – Landscape Character Areas. The Hubble's Farm site and all of Pembury village lie within the Pembury Forested Plateau character area.
- 3.3 The key characteristics, valued features and qualities of the relevant character areas can be summarised as follows:

Pembury Forested Plateau (all within the AONB):

Key Landscape Characteristics:

- *Sandstone forming a high plateau rising to rounded hill tops in the centre of the forest, cut by long valleys of streams flowing northwards to the Medway, creating the locally characteristic topography of deep valleys and ghylls.*
- *Extensive woodland and forest cover dominates and tends to conceal local topographic variations and limits views both within the area and beyond.*

- *Wooded slopes form a backdrop to views from the surrounding areas including from Royal Tunbridge Wells.*
- *Within the woodland, grassland pastures bounded by thick shaws and sweeps of parkland provide an important contrast.*
- *Areas of relict heathland on the light soils of the sandstone ridges with two extensive areas of heathland restoration at Pembury Heath and Brenchley/Cinderhill Wood.*
- *A relative sense of remoteness despite its proximity to Royal Tunbridge Wells, Tonbridge and two main roads slicing through the area. Well served with recreational routes allowing good access on foot.*
- *A self-contained landscape with a 'remote' secretive character with comparatively little settlement apart from Pembury village.*
- *Occasional rural lanes, vernacular buildings and small scale irregular fields provide an intricate pattern and human scale as well as a sense of history.*

Valued Features & Qualities:

- *Historic farmsteads*
- *Ancient routeways*
- *Ancient woodland, ghylls and shaws*
- *Small, irregularly shaped historic field pattern, bounded by hedgerows and small woodlands*
- *Heathland*
- *Strong natural character*
- *Woodlands, wooded ghylls and mosaic of pasture, heathland and wildflower meadows*
- *Sense of relative remoteness*

Paddock Wood/Five Oak Green Low Weald Farmland;

Key Landscape Characteristics:

- *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.*
- *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.*

Valued Features & Qualities:

- *Lies within the AONB.*
- *Slopes in the south of the area which rise up to the High Weald and provide an important transition between the High Weald to the South and the Low Weald*
- *Network of ancient routeways*
- *Frequent historic farmsteads and oasts*
- *Areas which retain a sense of the historic landscape*
- *The Hamlets of Tudeley and Capel*
- *The old Hawkhurst Branch Railway Line*
- *Areas of woodland, trees and hedgerows*
- *Traditional orchards*

Medway River Valley:

Key Landscape Characteristics:

- *A flat open and large-scale mainly arable valley landscape.*
- *Few settlements or roads in the floodplain due to seasonal flooding, with built development limited to the higher ground at the boundaries of the area. Very open character lacking in prominent features with a feeling of isolation.*
- *Large-scale arable farm units including extensive outbuildings and grain stores occur at the lip of the valley floor.*
- *Large artificial lakes, probably associated with previous gravel extraction, and localised areas of woodland planting.*
- *A network of slow moving water channels and tributaries including the Alder Stream and Hammer Dyke introduce pattern and diversity into the landscape at the micro-scale.*
- *Isolated, due to severance to the south by the rail line running east-west and the River Medway to the north, with a limited road and lane network. However, there is a high concentration of footpaths which cross the area enabling walkers to experience this sense of isolation.*

Valued Features & Qualities:

- *Views to the rising wooded slopes of the High Weald to the south*
- *Sense of isolation*
- *Small remaining fragments of ancient woodland*

Matfield/Brenchley Fruit Belt (largely within the AONB):

Key Landscape Characteristics:

- *A plateau landscape, consisting of a series of low undulating ridges and intersecting valleys.*
- *The High Weald scarp slope provides extensive views out over the Low Weald to the north.*

- *Orchards with regimented ranks of fruit trees and hop poles lend a patchwork and 'gardenesque' quality.*
- *The narrow, wooded ghyll valleys which cut the plateau top create a more intimate, enclosed and ecologically rich landscape.*
- *Rural lanes dip down from the open plateau top and into the wooded valleys, winding beneath a network of green, woodland tunnels. These are bound by diverse and colourful hedge banks, important for their ecological diversity.*
- *A patchwork with fields of arable and pasture interspersing orchards. Large arable fields in the north-west and occasional large fruit packing stations.*
- *The distinctive villages of Matfield, Brenchley and the hamlet of Castle Hill.*
- *Historic farmsteads and timber-framed houses are dispersed across the area, creating a harmonious balance with the landscape of woodlands, orchards and fields.*
- *Calm, colourful and vibrant rural landscape with relatively dark skies across the whole area.*

Valued Features & Qualities:

- *Lies within the AONB.*
- *Distinctive scarp slope as a setting to High Weald.*
- *Dispersed settlement pattern and historic farmsteads.*
- *Ancient routeways.*
- *Remnant ancient ghylls.*
- *Scenic beauty.*
- *Sense of tranquillity and relatively dark skies.*
- *Distinctive character of Matfield and Brenchley.*
- *Views from Millennium Viewing Point.*

Speldhurst Wooded Farmland (AONB)

Key Landscape Characteristics:

- *Complex topography with open, smooth ridges of sandstone radiating out from Royal Tunbridge Wells, cut by deep tributary valleys.*
- *Conspicuous outcrops and crags of sandstone which have been weathered into unusual, distinctive forms.*
- *Hedgerows dominated by holly and beech with areas of gorse common in boundaries and verges.*
- *Varying field sizes from large-scale open pasture and arable on the ridge tops to small, irregular fields within the valleys.*
- *Small villages on the ridge tops, with church spires and towers at Bidborough, Southborough, Speldhurst and Rusthall, are prominent skyline features.*
- *Ornamental designed parklands and country estates on the ridge tops.*
- *Extensive, panoramic views available out across surrounding countryside and open hill tops.*
- *Long, narrow ghyll woodlands, hidden within deep clefts of the valleys, support a particularly rich, lush vegetation cover.*
- *Commons, permeating the built up areas of Royal Tunbridge Wells and Southborough, retain remnants of their former heathland character.*

- *Networks of narrow lanes following ancient routeways, descend and climb the valleys and ridges. Dark tunnels of holly and steep banks of sandstone are distinctive features. Broad swathes of permanent and semi-improved pasture on the hill slopes represent an internationally important reserve of acidic and neutral grassland.*
- *A relative rural character despite its proximity to Royal Tunbridge Wells and Tonbridge. Well served by recreational routes allowing good access to nature.*

Valued Features & Qualities:

- *Scenic and distinctive topography*
- *Dispersed historic settlement pattern*
- *Network of ancient routeways*
- *Frequent and extensive areas of woodland*
- *Pattern of intact small irregular fields*
- *Extensive and panoramic views out across the High Weald*
- *The Commons as setting to the town of Royal Tunbridge Wells*
- *Quiet and rural character*
- *The role of landscape for recreation*
- *Ornamental parklands and gardens*
- *Large areas of unimproved and improved grassland and pastoral fields*

Bayhall Open Farmland (lies within the AONB):

Key Landscape Characteristics:

- *Distinctive topography with a high sandstone ridge providing extensive, panoramic views out across the successive wooded ridges of the High Weald.*
- *An open arable ridgetop with local contours and undulations infilled and smoothed out creating a bland, expansive character lacking local landscape detail.*
- *Intersecting valleys to the north and south provide areas of diversity with permanent pasture and ghyll woodlands.*
- *Blocks of woodland and individual mature trees on the ridgetop are a very important landscape feature and ecological resource.*
- *Large 'historic' farm complexes dispersed across the area on the upper slopes.*
- *At the northern and western edges of the area, an ornamental/ parkland character providing a transition between Royal Tunbridge Wells town and the wider countryside.*
- *Ancient routeways running along the ridgelines, now forming rural lanes, tracks and recreational footpaths, particularly the High Weald Landscape Trail.*
- *The remnant historic landscape of medieval assart fields, wooded shaw boundaries and ancient routeways which retains a rural character despite the area's proximity to Royal Tunbridge Wells.*

Valued Features & Qualities:

- *Lies within the AONB*

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- *Ancient routeways*
 - *Remnant ancient ghylls.*
 - *Dispersed settlement pattern.*
 - *Distinctive topography allows intervisibility with surrounding High Weald.*
 - *Extensive panoramic views from High Weald Landscape Trail.*
 - *Rural character despite proximity to the town*

Landscape Context

- 3.7 The Hubble's Farm site is located in countryside to the immediate south of Pembury village (refer to Figure 1). It comprises the main house and garden, ancillary buildings, equestrian facilities, including a sand school, a walker, stabling, barns as well as 6-7 grazing paddocks. In all the site amounts to around 5Ha in area. A further house that fronts onto Hastings Road is also within the site. This together with the existing Hubble's Farm access drive would provide the potential for a wider access to the site for a more significant residential development. There are two mobile telephone masts at the high point of the site on the southern boundary (although these would be moved should the site come forward for development). The site, excluding the main house and farm buildings, is within the AONB, as is the adjoining countryside, but the built-up area of Pembury is outside of the designation (refer to Figures 2 and 5).
- 3.8 The High Weald Landscape Trail and Tunbridge Wells Circular Walk follow the same Public Right of Way along the eastern boundary of the site, whilst a further Public Right of Way (footpath) runs along the southern edge linking these with Chalket Lane, itself a Public Right of Way (footpath), and the centre of the village.
- 3.9 The site is located at between 126m AOD and 140m AOD, rising from north to south, at and just to the north of the crest of a primary ridgeline that runs east from Tunbridge Wells and through the High Weald to Goudhurst (refer to Figure 4). This ridgeline undulates from around 130-150m AOD at Tunbridge Wells, to 130m AOD west of Pembury, rising to 144m AOD just south of the site, before falling steadily towards around 126m AOD at Kippings Cross to the west of Pembury. The landform to the south of this ridge falls away in a complex pattern of rolling minor ridgelines and twisting valleys. North of the ridge the topography falls away more gradually and in a more uniform series of ridges and valleys, all generally aligned north to south.

- 3.10 The A21 Pembury Bypass dual carriageway cuts through the primary ridge between Tunbridge Wells and Pembury, before turning onto a roughly east-west alignment following the ridge to Kippings Cross. Immediately south of the site it runs in an 8-10m deep cutting. Although the road and the traffic on it are generally well screened by virtue of the cuttings, the cut slopes of the bypass are partially planted up, rather than wholly. The intention appears to have been to integrate the cuttings into the landscape by planting the cut slopes where they lie adjacent to existing woodlands and leaving these as simply grassed where they run adjacent to fields. Consequently, the cut slope adjacent to the site is partially planted and partially open.
- 3.11 The High Street at the south-western edge of Pembury is aligned along the ridgeline but otherwise the village lies north and parallel with this and has developed north along a minor ridgeline to Lower Green. Hastings Road, which runs parallel with the site boundary to the north, comprises mainly detached and semi-detached properties constructed in the inter-war period, consolidated in the 1950's and 1960's. The Pembury Conservation Area¹¹ is centred on the village green at the junction of the High Street/Hastings Road, Lower Green Road and Chalket Lane with its larger scale buildings set in spacious gardens. The boundary of the designation is contiguous with the site boundary for a short length to the north-west of Hubble's Farm. The general character is that of an eclectic and loose mix of buildings and spaces which, nevertheless, make a unifying relationship. The special characteristics of the Conservation Area are set out in the Borough Council's Conservation Area Statement (April 1998) and include the variety of building materials, juxtaposition of age and style of building, contrast of spaces/density of building, green spaces, trees, chimneys, boundary treatments, containment and gateways.
- 3.11 Notwithstanding its high elevation relative to the surrounding countryside, the dense tree cover at the edges of the village and in the surroundings, and the relatively low height and domestic scale of the buildings, ensure that Pembury is generally concealed in views from the AONB, from both close to and from longer distances. Views, both into and out of the village, are limited, which promotes a sense of intimacy and reinforces the introvert nature of the settlement.

¹¹ http://www.tunbridgewells.gov.uk/data/assets/pdf_file/0019/24814/CAA_Pembury.pdf

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- 3.12 The site rises to a level some 7m higher in elevation, along its southern edge, than the village green (at 140m AOD and 133m AOD respectively). This slightly higher elevation is sufficient for the southern edge of the site to provide long views north, over the village, to and beyond the Medway Valley to the Greensand ridge that foots the North Downs. Views out to the south are limited by a combination of the dense vegetation along the bypass and other woodlands.
- 3.13 A potential Zone of Theoretical Visibility (ZTV) is illustrated at Figure 6. The area highlighted is based on a bare earth analysis, i.e. without vegetation or other structures, and on a building height of 7.5m above ground level; ground level being assumed as a worst case, i.e. the highest point on the site at 140m AOD. This identifies that the location of the site in relation to the primary ridgeline significantly restricts most views to the site from the south; those areas indicated to the south would, in practice, not have views because of intervening vegetation, similarly for views to the east and west. Views from the north are possible, but again not as extensively as the ZTV might indicate because of the presence of the buildings within the village in the foreground of these views. Very long views from the north of the Medway Valley are also possible but because the distances are in excess of 8km these are not considered to be relevant.

4.0 LANDSCAPE AND VISUAL IMPACT APPRAISAL

Outline Proposals

- 4.1 At this stage of the promotion of the site only a limited amount of masterplanning has been undertaken. An initial Sketch Concept was prepared by Enplan seek to define a number of key landscape principles (refer to Figure 7). These are as follows:
- The need to provide for a strong landscaped 'green spine' to the development, running broadly east to west, at or close to the break in the rising ground, in order that the views of the upper parts of the development could be softened as far as practicable;
 - The need for a landscaped buffer along the southern perimeter to provide a set-back from the top for the A21 cutting for the new housing and for the public footpath, but also to provide space to mitigate views of the new housing from the public footpath to the south of the A21;
 - Within the scheme, a circular or oval open space, centred on the sharp change in level by the existing sand school. This space would provide a sense of place for the development; and
 - To provide for potential pedestrian links (and cycle where appropriate) to the adjoining public right of way network.
- 4.2 The Sketch Concept also identifies that housing can back onto the existing rear gardens of houses on Hastings Road and front onto all other external boundaries, such as the cricket pitch, the cemetery and the landscape buffer to the south. The proposal was for around 120 houses.
- 4.3 This concept was discussed informally with Tunbridge Wells Borough Council officers and then further developed by Broadway Malyan and subsequently by Thrive (refer to Preliminary Sketch Layout at Figure 8). The Thrive layout has been prepared subsequent to the publication of the Consultation Draft local Plan and responds to the draft policy requirements, including the safeguarding of the land to the south of the cemetery, the provision of children's play space and the provision of a 40m wide set-back along the southern boundary against the A21.

Visual Impact Assessment

- 4.4 The purpose of this preliminary visual impact assessment is to identify a number of publicly accessible viewpoints within relative close proximity to the site at which locations significant visual effects may be likely. If there were any especially prominent long-distance views that would be affected, for example from well-known viewpoint locations or long distance trails these would have been included but there are no such locations where the effects would be noticeable and not significant.
- 4.5 Paragraph 3.13 above has described the ZTV and of the general nature of the views from the wider surrounding area; these being very limited. Figure 5 identifies the location of six viewpoints local to the site. Viewpoint 1 (Figure 9) is located at the site entrance on Hastings Road. Views of the site and of the potential housing on it, from Hastings Road, are restricted by the frontage housing along Hastings Road to narrow glimpses between buildings. At the site entrance there is a somewhat wider view in which the mobile phone masts are currently prominent. A new site entrance at this location would require widening of the existing drive arrangement and the potential demolition of one property (within the site boundary). This would evidently open up the view and allow a more obvious view into the new housing area. However, as currently laid out the central open space would be seen as the focus of this view and could be an attractive entrance feature and help in mitigating the visual change. The effect of this on the view would be noticeable but not necessarily an adverse effect and not significant.
- 4.6 Viewpoint 2 (Figure 9) is located on the public footpath that forms the route of the High Weald Trail and is part of the Tunbridge Wells Circular Path. The route is separated from the site by a dense wooded hedge and well screened, as the photograph demonstrates, although in winter, filtered views through the vegetation could be anticipated. The effects of the new housing on views from this footpath would be adverse by the effect is likely to only be slight and not significant. Viewpoint 3 (Figure 10) is located on the High Weald Trail and the same footpath but on the footbridge over the A21. Evidently at this location the view towards the site is more open but dense trees on the bypass cutting and beside the site itself, combine to provide a good screen of the majority of the site. The gap in the bypass planting to the west of the woodland provide a view through and across the very southern edge of the site. Thrive's Preliminary Sketch Layout (Figure 8) provide for a set-back of the housing from the southern boundary which can be landscaped. Detailed assessment and design in any forthcoming planning application should ensure that either the housing could be fully screened or at least set back and mitigated to a high degree. The number of storeys of the houses should also be a consideration along this edge and

it is suggested that this should be limited to no more than two. The residual visual effect on users of the footbridge would be, without setting back and mitigation, noticeably adverse at worst and potentially significant but with careful consideration should be capable of being reduced to only a slight adverse effect which would not be significant.

- 4.7 Viewpoint 4 (Figure 10) is sited on the public footpath that runs along the southern boundary. Views from this footpath would be substantially affected by housing development on the site and this effect would be significant. Mitigation would be provided by having a broad landscaped area along this boundary with the housing fronting onto it. Nevertheless, the character of the views would change from essentially rural ones to a more urban scene.
- 4.8 Viewpoint 5 (Figure 11) is located on the Chalket Lane overbridge of the A21 bypass. Much like the views from the High Weald Trail to the east of the site, Chalket Lane to the west is enclosed by woodland and the site is well screened from it. At the bridge views open up but, unlike the views from the bridge to the east, the wooded cutting slopes of the bypass would fully screen the site. There would be no visual change.
- 4.9 Between Chalket Lane and the High Weald Trail to the south of the A21, a further footpath connects these two and runs through a series of woods and between tall hedgerows and along the primary ridgeline. This route enjoys glimpses of a spectacular High Weald landscape to the west, where vegetation permits, as the high ground of the ridge gives way to a rolling, open agricultural scene. Views from it to the north are highly restricted by vegetation and limited to occasional open glimpses or filtered views through the vegetation. Viewpoint 6 (Figure 11) is located at one of a very few open glimpses and at this view the roofs of housing at the edge of the village is just visible. New housing would be more prominent in this view but would be mitigated by new planting. Given the very restricted nature of views from the footpath the character of it and its amenity would not be noticeably adversely affected overall. The visual effect at the narrow gaps would be greater, however, and may be considered to be significant given the high sensitivity of the receptor at this location. Careful consideration should be given to increasing the density of the proposed planting along the highway boundary to a full screen. The landscaped buffer beyond this would not necessarily need to be fully planted and the housing could enjoy a partially open aspect. The number of storeys of the houses should also be a consideration along this edge and it is suggested that this should be limited to no more than two.

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- 4.10 From the bypass itself the depth of the cutting would ensure that these would be no views of housing development. Viewpoint 7 (figure 11) is a view from the lay-by beside the bypass. The gap in the cutting slope vegetation beside the site does not open up a view of the site itself. As any new housing would be set back from the edge of the site and the top of the cut slope, it should remain fully concealed. Again, should the scheme come forward as a planning application in the future, this should be further tested.
- 4.11 In summary, no long-distance views are anticipated to be significantly adversely affected, including from within the AONB. The main visual effects would be experienced at close distances to the site, in glimpsed views from Hastings Road, from the High Weald Trail at the overbridge of the A21 and from the footpath between this and Chalket Lane. Careful design of the location of the housing and its height (limited to two storeys), plus landscape treatment of the buffer with dense planting along the boundary with the bypass cutting but more open planting within the buffer to give the housing an attractive outlook, would have the potential to reduce the residual visual effects to less than significant. The Tunbridge Wells Landscape Sensitivity Assessment highlights that the land between the A21 and the village (Pe8) has a number of visual sensitivities, including the risk that it would be visible on the skyline, especially from the wide AONB to the south. This preliminary assessment has demonstrated that development at the Hubble's Farm site could be undertaken without giving rise to such wider and more telling effects than the comparatively limited and modest effects at a local level.

Landscape Character Effects

- 4.12 The landscape value of the AONB parts of the site is, in strict planning policy terms, to be considered of national value. However, not all of the site is within the AONB, this being the farmstead and this being of only local value, and the AONB parts are not in themselves of any special character that is representative of the AONB or that expresses such characteristics. Overall, it is considered that the appropriate value for the site is of county value only. Its landscape susceptibility to residential development is considered to be moderate particularly given its close relationship to the existing urban edge of the village, its division from the wider countryside to the south by the bypass cutting and its relatively lack of a visual relationship with that wider landscape. Combining value and sensitivity generates an assessment of the site's landscape sensitivity and it is considered that the sensitivity is moderate. The Tunbridge Wells Landscape Sensitivity Assessment considers the sensitivity to be medium to medium-low.

- 4.13 The consideration of landscape character effects takes two parts; the first relates to changes to the fabric of landscape features on the site and, the second, a consideration of how these changes would alter the key characteristics of the landscape of the site and its context. Evidently there is a link between the extent and degree of visual effects and the extent and degree of landscape character effects, as the former to a considerable degree is an expression of how such changes are perceived.
- 4.14 In respect of the site and the changes to it, the change from a farmstead of farm buildings, equestrian uses and paddocks to a residential development would be a substantial change but one that is inevitable with greenfield development. Good design of the layout, architecture and the landscape would mitigate these changes but in landscape terms, within the context of a partial AONB site, the effect has to be considered an adverse one in principle.
- 4.15 As the visual impact assessment has highlighted the proposals would be barely visible from publicly accessible locations. Given the very limited visual effects the changes to landscape character of the wider area considered to be slight with the underlying key characteristics of the AONB unaltered to any degree.
- 4.16 The overall effect on the character and appearance of the landscape and the AONB would be a balance of a limited visual effects on a few views from within the AONB and no change to the key characteristics of the landscape of the AONB. Overall, a slight adverse magnitude of effect on a site of moderate sensitivity. This would represent an effect that would be of a moderate-minor significance but not significant in the meaning of significance as expressed in the EIA Regulations. Furthermore, it is considered that together the development proposals may conserve the designated landscape overall with good design and appropriate mitigation.

5.0 CONCLUSIONS

- 5.1 The Hubble's Farm site, in the context of the wider sub-areas (Pe8 and PE1 respectively) has performed comparatively well in the Tunbridge Wells Borough Council's Landscape Sensitivity Assessment and Green Belt Study. It is one of the three least sensitive sites in landscape terms and the land parcel that contributes least to Green Belt principles in the borough. TWBC have allocated the site for residential development for approximately 90 dwellings in their Regulation 18 Consultation Draft Local Plan subject to various requirements, including the safeguarding of land south of the cemetery for possible future expansion of the cemetery.
- 5.2 The preliminary landscape and visual assessment drove some initial proposals that were based around a number of principles (refer to Figure 7). These were as follows:
- The need to provide for a strong landscaped 'green spine' to the development, running broadly east to west, at or close to the break in the rising ground, in order that the views of the upper parts of the development could be softened as far as practicable;
 - The need for a landscaped buffer along the southern perimeter to provide a set-back from the top of the A21 cutting for the new housing and for the public footpath, but also to provide space to mitigate views of the new housing from the public footpath to the south of the A21;
 - Within the scheme, a circular or oval open space, centred on the sharp change in level by the existing sand school. This space would provide a sense of place for the development; and
 - To provide for potential pedestrian links (and cycle where appropriate) to the adjoining public right of way network.
- 5.3 Thrive have prepared a further Preliminary Sketch Layout (refer to Figure 8). The Thrive layout has been prepared subsequent to the publication of the Consultation Draft local Plan and responds to the draft policy requirements, including the safeguarding of the land to the south of the cemetery, the provision of children's play space and the provision of a 40m wide set-back along the southern boundary against the A21.
- 5.4 In terms of visual effects, no long-distance views are anticipated to be significantly adversely affected, including from within the AONB. The main visual effects would be experienced at close distances to the site, in glimpsed views from Hastings Road, from

the High Weald Trail at the overbridge of the A21 and from the footpath between this and Chalket Lane. Careful design of the location of the housing and its height (limited to two storeys), plus landscape treatment of the buffer with dense planting along the boundary with the bypass cutting but more open planting within the buffer to give the housing an attractive outlook, would have the potential to reduce the residual visual effects to less than significant. The Tunbridge Wells Landscape Sensitivity Assessment highlights that the land between the A21 and the village (Pe8) has a number of visual sensitivities, including the risk that it would be visible on the skyline, especially from the wide AONB to the south. This preliminary assessment has demonstrated that development at the Hubble's Farm site could be undertaken without giving rise to such wider and more telling effects than the comparatively limited and modest effects at a local level.

- 5.5 The overall effect on the character and appearance of the landscape and the AONB would be a balance of a limited visual effects on a few views from within the AONB and no change to the key characteristics of the landscape of the AONB. Overall, a slight adverse magnitude of effect on a site of moderate sensitivity. This would represent an effect that would be of a moderate-minor significance but not significant in the meaning of significance as expressed in the EIA Regulations. Furthermore, it is considered that together the development proposals may conserve the designated landscape overall with good design and appropriate mitigation.
- 5.6 Furthermore, the emerging Local Plan is seeking to allocate various sites in the AONB, including sites to both the east and west of Hubble's Farm, and it is considered that whilst development at Hubble's Farm would have a direct effect on the AONB, this would be local to the site only and substantially moderated by on-site landscape considerations (i.e. set-backs and landscape planting), and would not be an effect that would have consequences for the AONB beyond the site and its immediate context. Consequently, it is considered that the proposals may be capable of conserving the landscape character and qualities of the High Weald AONB, in overall landscape terms, and, as the effects are capable of being moderated, proposals would not necessarily be in conflict with Part (c) of Paragraph 172 of the Framework.
