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### Appendices

- Appendix A: Comparison Sites Location Plan
- Appendix B: Comparison Sites Heritage plan and MAGIC Map
- Appendix C: Site CRS4 – Aerial Photograph and Photosheets
- Appendix D: Site CRS6 – Aerial Photograph and Photosheets
- Appendix E: Site CRS7 – Aerial Photograph and Photosheets
- Appendix F: Frythe Way Site – Aerial Photograph and Photosheets
1.0 INTRODUCTION

Purpose of this Report

1.1 CSA Environmental has been appointed by Taylor Wimpey UK Ltd to undertake a landscape overview of a number of draft allocation sites identified in the Tunbridge Wells Borough Draft Local Plan (Regulation 18 Consultation Draft). This review will form part of the supporting information which will inform representations to the examination of the emerging Local Plan.

1.2 The following three sites are the subject of this review and these are identified on the Sites Location Plan in Appendix A:

- Policy AL/CRS4: Turnden Road, Hartley Farm
- Policy AL/CRS6: Gate Farm, adjacent to Hartley Road and Glassenbury Road, Hartley
- Policy AL/CRS7: Land off Golford Road

1.3 Taylor Wimpey are promoting land at Frythe Way (see the Comparison Sites Location Plan in Appendix A and a summary of the key landscape findings in respect of this site are also set out within).

1.4 This report also makes reference to the Landscape Sensitivity Assessment of Additional Settlements in Tunbridge Wells (Paddock Wood, Horsmonden, Hawkhurst and Cranbrook) which was carried out by LUC on behalf of Tunbridge Wells Borough Council in July 2018. The purpose of the sensitivity assessment was stated as being to help inform the preparation of the new Local Plan and, alongside other aspects, identify potential sites for allocation.
2.0 SITE CRS4: TURNDEN FARM, HARTLEY ROAD

(SHELAA reference: Site 430)

Area Description

2.1 Policy AL/CRS4 relates to Site CRS4 as shown on the Comparison Sites Location Plan in Appendix A and on the Aerial Photograph in Appendix C. Site CRS4 comprises two areas of land, which for the purpose of this report, have been labelled Areas A and B. Site CRS4 is set within a series of arable fields with a woodland belt separating the two areas. Several small ponds are also found within Site CRS4. There are a mix of existing buildings within Area A, including a residential property and some commercial buildings. The site forms part of two wider fields which are bound by hedges and mature trees along Hartley Road to the north west, and mature woodland following Crane Brook to the south east. The western part of Site CRS4, Area A, is currently under construction following the approval of an application for the demolition of existing farm and commercial buildings and the erection of 36 new residential dwellings, with access off Hartley Road (as illustrated on the Aerial photograph in Appendix C).

2.2 The wider landscape surrounding Site CRS4 comprises a mix of agricultural fields and large blocks of woodland. To the west, lies Hartley Road, with linear residential development along its route. Further to the north is the urban area of Cranbrook, which is separated from the site by a mix of open, tree lined fields. This area between Site CRS4 and the built up area of Cranbrook to the north east is identified as an adopted allocation (in the Tunbridge Wells Borough Site Allocations Local Plan 2016) for residential development of approximately 200-250 dwellings (as illustrated on the Comparison Sites Location Plan at Appendix A).

Designations

2.3 Site CRS4 lies within the High Weald Area of Outstanding Natural Beauty (‘AONB’). The Grade II Listed Turnden lies on the western edge of Area A. An area of Ancient Woodland also lies to the immediate south east of the site. Please refer to Heritage Plan and MAGIC Map in Appendix B.

2.4 Several mature oak trees lying within the site and lining the driveway which connects the site to Hartley Road are covered by a Tree Preservation Order (this was confirmed by examination of the Tunbridge Wells Borough Council’s online mapping on the 16th of October 2019).
Visibility

2.5 Views into Area A are possible from Hartley Road, at the existing farm access. Both Areas A and B are also visible from public footpath 0067/WC115/1 to the south west, with an open view into Area B possible (as shown in Photographs 01 & 02 at Appendix C). Partial views of Area A are also possible from a number of properties along Hartley Road, seen above the intervening field boundary vegetation.

Landscape Character

2.6 Site CRS4 lies within the Sub-Area Cr2, as identified in the Council’s Landscape Sensitivity Assessment. The report states that Sub-Area Cr2 contains features characteristic of the AONB including, wooded ghyll valleys and frequent orchards. It notes that the area to the south and east of Crane Brook has a particularly strong sense of remoteness from Cranbrook.

2.7 The report describes the sensitivity of the area to small scale development as high/medium-high. Land to the south east of Crane Brook is assessed within the report as being of high sensitivity, whereas the land closer to Hartley road is assessed as being of medium-high sensitivity.

2.8 From our own assessment of Site CRS4 we would broadly concur with the findings of the Landscape Sensitivity Assessment, noting in particular that the site plays an important role in forming the open land between Hartley and Cranbrook. Notwithstanding the currently under construction scheme for 36 dwellings in the western part of the site, this role will be further emphasised once the adopted allocation site to the immediate north east is built out, with the site forming a more important open break between these the settlements. In addition, we would consider the eastern part of Site CRS4 (Area B) to be of higher sensitivity owing to its separation from Area A by the band of woodland, its rural character apparent in views from the public footpath to the south.

Relationship to Settlement

2.9 Although the western part of Site CRS4 is currently under construction, the planned 36 new dwellings will replace the existing farm and commercial buildings on the site and will read as an isolated development, away from the built up area of Cranbrook. In fact, the site is more closely related to the village of Hartley and the linear development extending along the A229. Development of this site would substantially extend the built up area of Cranbrook in a south western
direction, eroding the sense of separation between Hartley and Cranbrook.

Summary

2.10 Development of Site CRS4 would substantially extend built form south west of Cranbrook and the adopted allocation for 200-250 dwellings. The cumulative impact of both these sites would be the substantial sprawl of Cranbrook south westwards, eroding the sense of separation and separate identities of Cranbrook and Hartley. Development in the eastern part of the site (Area B) would also be highly visible from the public footpath to the south, which currently experiences open views across this area and would be detached from the rest of the site by virtue of the mature woodland belt.
3.0 SITE CRS6: GATE FARM, ADJACENT TO HARTLEY ROAD AND GLASSENBURY ROAD, HARTLEY

(SHELAA Reference: Sites 59, 70, 323 & 345)

Area Description

3.1 Policy AL/CRS6 relates to Site CRS6 as shown on the Comparison Sites Location Plan in Appendix A and on the Aerial Photograph in Appendix D. The site comprises two areas, which for the purpose of this report have been labelled Areas A and B. Area A comprises farmland to the west of Glassenbury Road and includes several farm buildings in the vicinity of Bull Farm and part of a wider pastoral field in the north. Area B comprises two fields, one of which contains disused agricultural buildings. The site boundaries generally comprise hedgerows with frequent mature trees, with the A229 bounding the southern edge of the Area B.

3.2 The site is largely surrounded by open tree lined fields with dispersed pockets of woodlands. The landscape to the west falls away more steeply and is largely free from development with increased woodland cover. To the immediate north-east of the site, there is ribbon development along the norther edge of Hartley Road.

Designations

3.3 The site lies within the High Weald AONB. Several listed buildings lie within the immediate proximity of the site including the Grade II Listed Bull Farmhouse which is indented into the south eastern corner of Area A and the Grade II Listed Hartley Gate Farmhouse which is indented into the southern boundary of Area B. Two areas of Ancient Woodland also lie within close proximity to the site. Please refer to Heritage Plan and MAGIC Map in Appendix B.

3.4 Two oak trees along the southern boundary of Area B, adjacent to the A229, are covered by a Tree Preservation Order (this was confirmed by examination of the Tunbridge Well Borough Council’s online mapping on the 16th of October 2019).

Visibility

3.5 Views into the southern part of Area B are possible from Hartley Road to the immediate south east of the site. Views of Area B are also possible from adjoining properties on Campion Crescent to the north east and Hartley Road, including the Grade II Listed Hartley Gate Farmhouse which is indented into the southern boundary of Area B. Partial views into
Area B are also possible from Glassenbury Road, which runs between Areas A & B of the site.

3.6 Views of Area A are possible from several of the buildings associated with Bull Farm including the Grade II Listed Bull Farmhouse. Views into the northernmost field of Area A are also possible from Glassenbury Road at the existing farm access gate, at which point long distance views are possible looking across the site to the falling landscape beyond (see Photograph 03 at Appendix D). Middle and long distance views of Area A from the rural landscape to the west of the site are also likely to be possible, given the falling topography and the position of Area A at the top of the west facing slope.

**Landscape Character**

3.7 Area B of Site CRS6 lies within Sub-Area Cr9, as identified in the Council’s Landscape Sensitivity Assessment. However, Area A of the site, lies outside the area that has been characterised in the Landscape Sensitivity Assessment. The report describes the part of Sub-Area Cr9 that overlooks Angle Wood which includes Area B as a rural landscape with little relationship to the urbanising settlement. This is in comparison to land closer to existing built form along the A229 where the report notes that existing development has a significant influence. However, the report states that there is likely to be very limited capacity for further small-scale development.

3.8 The report describes the sensitivity of the area to small scale development as high/high-medium. Land closer to the woodland area and Gate Farm is assessed as being of high sensitivity. Land closer to existing development is assessed as being of high-medium sensitivity.

3.9 From our own assessment of Site CRS6 we would broadly concur with the findings of the Landscape Sensitivity Assessment, with the site having a rural edge of village character, emphasised by the listed farm buildings. However, the western part of Site CRS6 (Area A) was not covered by the Landscape Sensitivity Assessment. We would describe the area as being rural in character, with the landform falling away to the west and with the potential for expansive views looking back towards this part of the site. We would therefore suggest that were Area A to have been included within the Council’s Landscape Sensitivity Assessment, it would likely have been assessed as being of high sensitivity to built development, being substantially separated from existing development.
**Relationship to Settlement**

3.10 Site CRS6 lies within the village of Hartley, adjoining existing ribbon development along the northern edge of the A229. A number of large farm buildings occupy the western part of the site (Area A), with two Grade II Listed farmhouses which is indented into the southern boundaries of the site. Development of the site is likely to adversely affect the character of the local landscape and the rural setting of the two listed buildings.

3.11 The village of Hartley and its surrounding landscape has a more rural character than the larger built up area of Cranbrook, and as such, it is not considered a suitable location for strategic housing sites which would be better focused on the edge of larger settlements, such as Cranbrook.

**Summary**

3.12 Development of Site CRS6 would introduce a substantial area of nucleated built form, at the western edge of Hartley village which is currently characterised by linear and ribbon development along the A229. Development here would adversely affect the character of the local landscape with the potential to also adversely affect the rural setting of the two adjacent listed farmhouses. Development of the western part of the site (Area A) in particular, would be prominent at the top of the hillside, and is likely to be highly visible in views from the rural landscape to the west.
4.0 SITE CRS7: LAND OFF GOLFORD ROAD

(SHELAA Reference: Late Site 32)

Area Description

4.1 Policy AL/CRS7 relates to Site CRS7 as shown on the Comparison Sites Location Plan in Appendix A and on the Aerial Photograph in Appendix E. The site comprises two broadly rectangular arable fields divided by a tree lined ditch and includes a number of mature trees. The outer boundaries of the site are bound by mature trees and woodland. Public footpaths 0067/WC108A/1 and 0067/WC109/1 largely follow the western, northern and eastern boundaries of the site. The High Weald Landscape Trail also runs along part of the eastern boundary within the site, continuing along Golford Road to the immediate south. There is a row of post mounted overhead wires which cross the western field of the site.

4.2 The site is bound to the immediate south by Golford Road which connects Cranbrook to the west and the village of Golford to the east. Site CRS7 is predominantly surrounded by large open fields bound by mature trees, scattered built development and areas of woodland. To the immediate west of the site, lies a sewage treatment works as well as open fields and sports pitches which separate Site CRS7 from the main urban area of Cranbrook.

Designations

4.3 Site CRS7 lies within the High Weald AONB. There are no listed buildings within the Site, however the Grade II Listed Paddocks Farmhouse lies within close proximity to the eastern site boundary. Cranbrook and Wilsley Green Conservation Areas lie to the west and north-west of the Site respectively. Please refer to Heritage Plan and MAGIC Map in Appendix B.

4.4 A number of trees along the southern boundary with Golford Road are covered by a Tree Preservation Order (this was confirmed by examination of the Tunbridge Well Borough Council’s online mapping on the 16th of October 2019).

Visibility

4.5 Open views across the site are possible from public footpath 0067/WC108A/1 running along the western edge of the site (Photograph 05 at Appendix E). Views across the site are also possible from public footpath 0067/WC109/1 as it runs along the north eastern edge of the
site, as well as partial views from the section of footpath which continues to the south east of the site. This footpath also forms part of the High Weald Landscape Trail long distance footpath. Open views across the site are also possible from several points along Golford Road on the approach into Cranbrook from the east (Photograph 06 at Appendix E).

**Landscape Character**

4.6 The eastern part of Site CRS7 lies within Sub-Area Cr7, whilst the western part of the site lies within Sub-Area Cr6, as identified in the Council’s Landscape Sensitivity Assessment. The report describes Sub-Area Cr6 as the core of separation between Cranbrook and Sissinghurst, as well as providing a strong sense of separation from adjacent settlements. The assessment describes the area as having expansive views. A lack of habitation other than isolated farmsteads, stream valleys and woodlands. The openness of the landscape is described as being important for preserving the Sub-Area’s rural character.

4.7 The assessment describes Sub-Area Cr7 as being characterised by wooded stream valleys with wooded slopes to the south of Golford Road forming a strong edge to the town of Cranbrook. The openness of land adjacent to Cranbrook and the proximity to Cranbrook Conservation Area is noted in the report to increase the sensitivity of the area.

4.8 The report assesses the sensitivity of both Sub-Areas Cr6 and Cr7 to small scale development as being high.

4.9 From our own assessment of Site CRS7 we would concur with the findings of the Landscape Sensitivity Assessment. The separation of the site from the urban area of Cranbrook contributes to its rural character, as does the openness of the landscape with wooded backdrops and a lack of built form within the area. All of these factors contribute to the site being highly sensitive to development.

**Relationship to Settlement**

4.10 Site CRS7 does not adjoin the existing settlement edge and is very poorly related to Cranbrook, in effect leap-frogging intervening fields and woodland. Development at this location would be entirely at odds with the existing settlement pattern and is likely to result in the future sprawl of further built form eastwards along Golford Road. Development here would also extend the perceived gateway into the town substantially eastwards along Golford Road and away from the Conservation Area, which currently defines the gateway into Cranbrook from the east.
Summary

4.11 Site CRS7 was identified in the Council’s Landscape Sensitivity study as being of High landscape sensitivity, with its eastern half falling within Sub-Area Cr6 which is stated as having a ‘strong separation from adjacent settlements’ and ‘very sensitive to any strategic development’. The western half of Site CRS7 falls within Sub-Area Cr7, which is stated as playing ‘a significant role in the setting of the Cranbrook Conservation Area’. The landscape has a strong rural character which is particularly evident from the two public footpaths that run along its boundaries (including the High Weald Landscape Trail long distance footpath). Open views across the site are possible from these footpaths as well as on the approach into Cranbrook from the east along Golford Road.

4.12 Overall, Site CRS7 is a highly sensitive landscape, which is detached from the existing settlement and is considered an unsustainable location for strategic growth. Its inclusion as a housing allocation does not appear to have been informed by the Council’s own Landscape Sensitivity study, which states the landscape is very sensitive to strategic development.
5.0 FRYTHE WAY SITE

(SHELAA Reference: Site 25)

Area Description

5.1 The Frythe Way Site is shown on the Comparison Sites Location Plan in Appendix A and on the Aerial Photograph in Appendix F. The site consists of a broadly rectangular parcel of land comprising an unmanaged orchard and an arable field. There is no public access into the site, although several public footpaths run adjacent to its boundaries.

5.2 The site adjoins the existing settlement edge to the east, which comprises mainly mid-late 20th century estate development. Restricted byway 0067/WC118A/2 and Freight Lane run adjacent to most of the northern and western site boundaries. Public Footpath 0067/WC114/2 runs the outside of the southern site boundary back towards Cranbrook. The wider landscape beyond the site consists of tree lined fields, crossed by numerous public rights of way and patches of mature woodland continuing westwards towards Hartley Road. To the immediate south east of the site lies an area of mature woodland. Further south east the pattern of tree lined fields and patches of woodland continues.

Designations

5.3 The Frythe Way Site lies within the High Weald AONB. There are no other designations within the site. One Listed Building lies within close proximity to the north eastern corner of the site. Please refer to Heritage Plan and MAGIC Map in Appendix B.

Visibility

5.4 Views into the site are possible from a short section of Freight Lane and restricted byway 0067/WC118A/2 to the immediate west of the site, with the majority of views screened by boundary vegetation. Occasional views are also possible from the upper floors of properties which adjoin the site to the east and from the single property which is indented into the north western corner of the site (reciprocal views at Photographs 07 & 08 at Appendix F).

Landscape Character

5.5 The Frythe Way Site lies within Sub-Area Cr1, as identified in the Council’s Landscape Sensitivity Assessment. The report describes the area as containing historic farmsteads, the Crane Brook, ghyll valleys,
woodlands and remnant traditional orchards. The open field within Sub-Area Cr1, which makes up a large proportion of the site, is described as well contained by tree cover.

5.6 The report describes the sensitivity of the Sub-Area to small scale development as high/medium-high/medium. The valley side at the northern end of the Sub-Area, facing the Conservation Area is assessed in the report as being of high sensitivity. Within the Site areas of land covered by woodland and orchards is assessed as being of medium-high sensitivity, whereas the field adjacent to Frythe Way is assessed as being of medium sensitivity.

5.7 From our own assessment of the Frythe Way site we would broadly concur with parts of the findings of the Landscape Sensitivity Assessment that are relevant to the site. The proximity of the site to the existing residential built up area and the containment afforded by heavily wooded and tree lined boundaries reduces the sensitivity of the site to development. We would therefore agree with the Council’s assessment that this area is of medium sensitivity to small scale development. Whilst the orchard on site is a characteristic feature of the local landscape, its lack of management has led to a decline in its condition.

**Relationship to Settlement**

5.8 The site adjoins the existing built up edge of Cranbrook to the east, which includes mid to late 20th century estate development on Frythe Walk and Frythe Way. The inter-visibility between the Site and the existing urban area exerts an urban fringe influence over the Site. It is well contained from the wider rural landscape by the area of woodland to the south and north west, and by the established tree belt along Freight Lane to the west.

**Summary**

5.9 The Site comprises a well contained parcel of land, adjoining the existing built up area of Cranbrook to its immediate east. It is considered to be a suitable and sustainable location for residential development. Existing fruit trees in the northern part of the Site are presently unmanaged, in declining condition and inaccessible to the public. The eastern parts of this area are therefore proposed to be removed to integrate proposals with the urban area and existing footpaths; with the western part proposed for selective removal and replanting, alongside other edible landscaping where necessary and appropriate. This area would also be opened up to public access for the benefit of the local community and users of the adjacent public footpaths.
6.0 CONCLUSION

6.1 This comparison study has considered the landscape and visual sensitivity of three draft allocation sites for residential development identified in the Tunbridge Wells Borough Draft Local Plan, as well as a fourth site located at Frythe Way which is being promoted by Taylor Wimpey.

6.2 The analysis of the draft allocation sites has highlighted some fundamental flaws in the selection process of sites under the Tunbridge Wells Borough Draft Local Plan. Principally the site selection process does not appear to have been informed by the council’s own Landscape Sensitivity study, with a number of the sites identified as being of high landscape sensitivity. In light of these flaws, which are summarised below, the site allocations should be re-evaluated and the Frythe Way site considered on its own merits. Given its strong relationship to the existing settlement of Cranbrook and its containment from the wider landscape, the Frythe Way site is considered less sensitive in terms of its landscape and visual constraints, than a number of the draft allocations proposed.

6.3 Site CRS4 lies to the south west of Cranbrook, adjoining the adopted allocation for 200-250 dwellings. The cumulative effect of both of these developments would be the substantial expansion of built development south west of Cranbrook, eroding the sense of separation between Hartley and Cranbrook. Development of this site would also be at odds with the existing settlement pattern of Cranbrook, particularly when compared to the Frythe Way site.

6.4 Site CRS6 lies on the western edge of Hartley and does not adjoin the larger settlement of Cranbrook. The site has a rural character, adjoined to the south by two listed buildings and is not considered a suitable location for strategic development, which should be focused on the edges of Cranbrook. Development of the western parcel in particular would sit at the top of a west facing slope and is likely to be prominent in views from the rural landscape to the west.

6.5 Site CRS7 lies to the east of Cranbrook but does not adjoin the existing settlement, with a sewage treatment works as well as open fields and sports pitches separating the site from the main built up area of Cranbrook. Development here would in effect leapfrog this intervening land and result in an unsustainable location for strategic growth. Furthermore, the landscape here is highly sensitive, as highlighted in the Council’s own Landscape Sensitivity study, with open views across the site from the two footpaths which adjoin the site and from Golford Road, on the rural approach into Cranbrook from the east. The draft allocation
of this site does not appear to have been informed by the Council’s own Landscape Sensitivity study.
Appendix A

Comparison Sites Location Plan
Appendix B

Comparison Sites MAGIC Map
© CSA Landscapes Ltd. Do not scale from this drawing. Refer to figured dimensions only.
Appendix C

Site CRS 4
Dixies Barns, High Street, Ashwell, Hertfordshire SG7 5NT

01462 743647
ashwell@csaenvironmental.co.uk

CSA/3703/111

October 2019

Frythe Way, Cranbrook

Comparison Sites Aerial Photographs- Site CRS4

Taylor Wimpey Strategic Land
View from public footpath 0067/WC115/1 looking north east towards Area A of Site CRS4  Photograph 01

View from public footpath 0067/WC115/1 looking north east towards Area B of Site CRS4  Photograph 02
Appendix D

Site CRS 6
View from Glassenbury Road looking west towards Area A of Site CRS6  Photograph 03

View from Glassenbury Road looking north towards Area B of CRS6  Photograph 04

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Appendix E

Site CRS 7
View from public footpath 0067/WC108A/1 within Site CRS7 looking east  Photograph 05

View from Golford Road looking north towards Site CRS7  Photograph 06

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Properties on Frythe Way

View from within the Frythe Way Site looking north east. **Photograph 07**

Property on Freight Lane

View from within the Frythe Way Site looking north east. **Photograph 08**

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**Project**: Frythe Way, Cranbrook

**Drawing Title**: Comparison Sites Photosheets - Frythe Way Site

**Client**: Taylor Wimpey Strategic Land

**Drawing No.**: CSA/3703/112

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**Drawn**: AJ

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