

Paddock Wood and East of Capel:

Proposed Allocation Site – Landscape Visual Assessment

JFA Ref: KEN2097

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Client	Save Capel/CGPS
Date	13.05.2021
Status	FINAL
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1.0 Introduction

1.0 This report has been prepared by Jane Hart Ba (Hons) DipLA CMLI, Principal Chartered Landscape Architect at JFA Environmental Planning (herein referred to as JFA).

1.1 This appraisal considers the current visual and baseline context of Paddock Wood and East of Capel and then assesses the potential impact of the proposed allocation site proposals and its removal from Metropolitan Green Belt designation within the Reg 19 draft Tunbridge Wells Borough Council (TWBC) Local Plan on the existing landscape character area.

1.2 The landscape capacity for development is also appraised. Both negative and positive impacts are noted in comparison with the current baseline.

2.0 Executive Summary

2.0 JFA was commissioned by Save Capel a campaign group to undertake a visual analysis to assess the landscape sensitivity of the proposed allocation site and its capacity to accept change and identify residual effects of the proposed allocation at Paddock Wood and east of Capel. This will include an appraisal of the cumulative effects of the proposed Tudeley Garden Village (2,800 dwellings) and already consented 1,126 dwellings within the 2km study area.

2.1 The site is located on 148-hectare (ha) area of agricultural land (OS Grid Reference TQ 660447) which is outside the High Weald Area of Outstanding Natural Beauty (AONB) which is 0.7km to the south, but currently within Metropolitan Green Belt. This area's release from the Green Belt and how this will impact the function of the adjacent extant Green Belt area is under discussion as part of the Reg 19 Local Plan consultations. Land to the west of the proposed extension to Paddock Wood and extending to the eastern edge of the A228 within Capel Parish boundary is outlined in the Development Strategy Topic Paper.

2.2 There is increasing pressure for housing, particularly affordable housing in Kent. There are many constraints to future development as a large extent of the borough is either designated as an Area of Outstanding Natural beauty (AONB) or Metropolitan Green Belt and there are many historic towns and villages with potential for adverse impacts on setting of Listed Buildings, Conservation Areas and Scheduled Monuments.

2.3 The report findings are informed by the baseline information provided by the following reports and documentation:

- Regulation 19 Consultation Pre-submission Local Plan 2020-2038;
- Tunbridge Wells Borough Landscape Character 2017 (Final, LUC, February 2017);
- Landscape Sensitivity Assessment of Settlements in Tunbridge Wells: Paddock Wood, Horsmonden, Hawkhurst and Cranbrook (LUC, July 2018); and
- Tunbridge Wells Strategic Sites Masterplanning and Infrastructure Study (February, 2021).

2.4 Other reports or documents of relevance to this report are listed in **Section 10.0**.

3.0 Development Proposals

3.0 There are no detailed proposals at present regarding the details of the development i.e., ridge heights etc. A basic block masterplan has been prepared by David Lock Associates which shows seven areas of development within the existing transport framework and network of public rights of way (PRoW), which will form a green infrastructure with a mosaic of habitats to form linkages to the surrounding landscape (**refer to Figure 1 Constraints Plan and Figure 2 Baseline Context**). The review of the allocation proposal will therefore concentrate on the principle of development in this location which is presently Green Belt, the landscape's capacity to accept development and the potential effects of the proposals on landscape character and viewpoints from the High Weald AONB.

3.1 The proposed mixed-use allocation site will provide the following:

- 3,490-3,590 new dwellings, mixed-use development and associated infrastructure;
- New off-line bypass around Colts Hill to the north of Alders Road;
- 10ha of sports facilities in the south west of the site south of the railway line;
- Works to A228 to the south of Alders Road; and a
- New link road , bypassing Five Oak Green.

4.0 Methodology

4.0 The basic visual appraisal methodology includes a desk study followed by a site visit where key views from various potentially sensitive locations are evaluated. Views are described in detail at **Section 8.0**.

- 4.1 The methodology for assessment follows, in principle, the methodology set out in the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) but at a lower level with no appraisal of magnitude of change.
- 4.2 If the allocation site is incorporated into the Local Plan and development proposals are submitted, a greater level of detail would be provided which would enable a full Landscape Visual Impact Assessment (LVIA) to be undertaken as part of a statutory Environmental Impact Assessment (EIA) under the 2017 Regulations.
- 4.3 A walkover of the site and local landmarks and viewpoints of importance was undertaken on the 7th and 13th April 2021 to help determine the context of the site and surrounding area and help evaluate the degree of change that might be expected to arise from the proposed allocation. Visibility was very good, but more views may be available in the late autumn-winter during maximum visibility when leaves are off the trees.
- 4.4 The proposals are considered in the context of the current baseline. The conclusion at **Section 9.0** describes potential impacts of the proposed housing allocation.

5.0 Baseline Context

- 5.0 The baseline is the current situation and is described below. Photographs of the site and the immediate setting and context are provided by **Figure 4 Photo-sheets 1-7**.

Access and Boundaries

- 5.1 The proposed allocation site is crossed by the south-east mainline railway and is bordered on its western and northern boundary by the A228. The B2017 runs along the southern boundary.

Vegetation

- 5.2 The surroundings are dominated by large agricultural fields and a framework of intermittent hedgerows with occasional large oaks, woodland copse and small shelterbelts. The urban fringe/rural interface at the current settlement boundary to Paddock Wood has tall coniferous garden boundary hedges.

Topography

- 5.3 The site is a lowland landscape, and the topography is flat at around 15-20m AOD. The landform of the Greensand Ridge to the north and the High Weald to the south form distinctive skyline backdrops in views. It is generally an open landscape and there are

frequent glimpsed distant views to the surrounding landscape, particularly the foothills of the High Weald and the higher land to the North.

- 5.4 Tudeley Brook crosses the area from adjacent Tudeley Brook Farm, north of the area to Badsell Manor Farm on the boundary of Alders Road ((B2017). There is much evidence of waterlogging and there is a network of ditches draining the farmland. This has limited the land-use in the past.

Local built context

- 5.5 Paddock Wood suburban expansion is associated with the railway station and dates from the 1950s. Residential property within both Paddock Wood and Five Oak Green seems to be mostly late 20th century suburban development but there are some Victorian cottages along the Maidstone Road. North of the railway line is mostly light industrial with warehouse developments. There is also light industry on both the east and west sides of the northern section of the A228.
- 5.6 Transport infrastructure, large-scale buildings, and pylons are prominent in the landscape and form visual detractors in the landscape.
- 5.7 Tudeley and Capel are small hamlets which have grown up around Grade I churches, with dispersed farmsteads scattered in the wider landscape. These smaller settlements and oast houses form distinctive features in the rural landscape beyond the urban fringe.

Public rights of way

- 5.8 There is an established network of interconnecting PRoW which cross the proposed site. Many of these PRoW relate to extant ancient drovers tracks which connected the low-lying floodplain at Capel to wood pastures in the High Weald ridgeline. These are shown on **Figure 2 Baseline Context** and views are illustrated on **Figure 4 Photo Sheets 1-7**.

6.0 National Planning Policy Framework

- 6.0 The current National Planning Policy Framework (NPPF, 2019) sets out the Government's strategic vision for the planning system in England. The policies and paragraphs which cover landscape and visual matters of relevance to the proposed allocation site near Paddock Wood and East of Capel include:

- Paragraph 133 states that the '*fundamental aim of Green Belt policy is to prevent urban sprawl*' due to their '*openness and their permanence*';

- Paragraph 136 goes on to say that *'Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified'*;
- Paragraph 137 it clarifies that the local authority should have, *'examined fully all reasonable options for meeting its identified need for development'*;
- Where there is a requirement to use land designated as Green Belt, paragraph 138 notes that land *'previously developed or well served by public transport'* should be prioritised; and
- Paragraph 172 relates to valued landscapes and states that *'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Outstanding Natural Beauty which have the highest status of protection in relation to these issues.'*

7.0 Landscape Character and Sensitivity

7.0 Landscape character is defined in the Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) as: *'A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse.'*

7.1 The general hierarchy of the published landscape character studies (national, county, and local) relevant to the site and its location are set out below:

National Character Area

7.2 The site and its surroundings lie within a flat, open landscape area within National Character Area (NCA) 121. Low Weald, with a strong cultural and visual relationship to the ridgelines of the NCA 119. North Downs and NCA 122. High Weald. These NCA are defined by Natural England in profiles published in December 2013. The NCA 121. Low Weald wraps around and between the higher land of the High Weald and the North and South Downs, and they are intrinsically linked and have a visual relationship.

7.3 The overall topography fluctuates around 40m AOD, with many areas such as the land to the west of Paddock Wood dropping down to 15m AOD. There is a visual connection to the higher land which form a distinctive skyline feature in many views. Views from the Low Weald to the higher land are filtered by hedgerows and blocks of woodland but this area is overlooked from the higher ground and there are panoramic views across the Low Weald to the corresponding ridgeline.

7.4 Some of the key characteristics of NCA 121 (page 6) that are relevant to the overall character of the landscape context surrounding the proposed site are:

- *‘Broad, low-lying, gently undulating clay vale with outcrops of limestone or sandstone providing local variation;*
- *The underlying geology has provided materials for industries including iron workings, brick and glass making, leaving pits, lime kilns, and quarries. Many of the resulting exposures are critical to our understanding of the Wealden environment;*
- *A generally, pastoral landscape with arable farming associated with lighter soils on higher ground and areas of fruit growing in Kent. Land use is predominantly agricultural, but with urban influences, particularly around Gatwick, Horley and Crawley;*
- *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 transport routes’; and*
- *‘Many small rivers, streams and water courses with associate water meadows, and wet woodland.’*

7.5 One stated environmental opportunity of note within the profile (page 19) is:

- *‘ Identify and maintain important views to elevated landforms outside the NCA, such as Wealden Greensand, the North and South Downs, and the High Weald, and encouraging detailed landscape assessment in advance of all significant development to identify ways of minimising impact on the rural character, and the local community and the environment.’*

7.6 This is a true representation of the current ‘broad stroke’ landscape character. More detailed analysis at an intimate scale follows.

County Landscape Character

7.7 At a county level, the site is shown to be within Character Area (LCA) Low Weald Fruit Belt (see Jacobs Babbie, The Landscape Assessment of Kent, October 2004 pages 87-88). This assessment sets out landscape character objectives or management recommendations to be applied to the specific landscape character areas at a county level to improve landscape and environmental quality.

7.8 The Low Weald Fruit Belt extends from Tonbridge to Staplehurst. It is assessed as having moderate sensitivity to development and low visibility. It is shown to be a coherent and unified landscape of historic time-depth, because of the distinctive oasts and scattered

weather-boarded farmsteads and hamlets within the area. It is described as exhibiting a strong 'sense of place'.

7.9 The area is shown to be in good condition with few detractors with a suggested policy of '**CONSERVE & RE-INFORCE**'. The summary of actions for this area of relevance to the allocation site proposal include:

- *'Conserve the rural elements of the landscape around settlements;*
- *Conserve the **scale** and tranquillity of rural settlements and hamlets';* and
- *'Conserve and re-inforce the attributes of rural lanes.'*

Local Landscape Character

7.10 Tunbridge Wells Borough Council (TWBC) and LUC have prepared a micro-level and detailed borough wide 'Tunbridge Wells Landscape Character Assessment' (2017), which builds on the earlier county level assessment and provides site specific landscape guidance, advice, and recommendations for each identified local area with homogenous features and landscape characteristics. The site is shown to be wholly within LLCA 13 Paddock Wood and Five oak Green: Low Weald Farmland (pages 112-118), and adjoining LCA 17 Medway River to the north west. It is a predominantly rural landscape that forms a transition from the higher land to the south in the foothills of the High Weald and the low-lying River Medway floodplain to the north. It is an open and lowland landscape, with large arable fields, although there is more variety in the landform and smaller irregular field pattern with thicker hedgerows around Tudeley and Capel. Fruit growing is in decline and most of the agriculture is arable.

7.11 Key characteristics for the LCA include:

- *'Flat or gently undulating;*
- *A mixed farmed landscape with extensive open, arable fields, dwarf fruit orchards and pockets of pasture;*
- *Remnant alder and poplar windbreaks, as well as individual tree 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 settlements characterised by dispersed farmsteads and small hamlets;*
- *A variety of building styles which ranging from groups of oasts, which are highly visible, to more modern suburban homes and bungalows;*
- *Open views across this intensively farmed landscape are frequently punctuated by the cowls of clustered groups of oast houses and extensive farm complexes. The Greensand Ridge to the north provides a distinctive skyline, whilst the High Weald to the south provides a wooded enclosure.'*

7.12 Valued features and qualities to be conserved within this local character area include:

- *'The extensive and panoramic views from within the AONB from the scarp slope at the public millennium viewing point in Brenchley...across the Low Weald;*
- *The hamlets of Tudeley and Capel which retain strong vernacular character, as well as views to the surrounding countryside.'*

7.13 Relevant landscape detractors mentioned of relevance, include:

- *'Extensive suburban development at Paddock Wood, and to a lesser extent Five Oak Green, often with a flat and open urban/rural interface...often ringed by poorly managed urban fringe countryside; and*
- *Proliferation of urban fringe land use...particularly around the flatter land around Paddock Wood.'*

7.14 Landscape strategy objectives for this area highlight its sensitivity in the context of its proximity to the AONB and its function as a setting for this valued landscape. The primary issue to be considered is, *'the vulnerability of this open landscape to built development, which is likely to be very visible in views'* (page 118).

Landscape Sensitivity

7.15 LUC have also produced a 'Landscape Sensitivity Assessment of Settlements in Tunbridge Wells: Paddock Wood, Horsmonden, Hawkhurst and Cranbrook' (LUC, 2018) for TWBC which accompanies and is informed by the landscape character assessment.

7.16 Sensitivity is based on the following criteria:

- Limits to Built Development;
- Location in relation to TWBC boundary;

- PRoW;
- Proximity or location within the High Weald AONB;
- Cultural heritage i.e., Conservation Areas, Registered Parks and Gardens etc;
- Natural designations i.e., Sites of Special Scientific Interest (SSSI) and wildlife sites etc;
- Flood Risk status.

7.17 Potential areas or parcels of land are assessed against these criteria and graded for sensitivity within the report.

7.18 The proposed allocation site at Paddock Wood and East of Capel is shown to be sub-area PW8. This is quite an extensive area and therefore the sensitivity varies across the site. Sensitivity is assessed as ranging from medium-low to high depending on the specific area and the type of proposed development.

7.19 Small to medium scale development such as 2-2 and a half storey residential at 30-40 dwellings per hectare where existing tree lines and hedgerows provide screening and framework close to the settlement edge, is assessed as medium to low sensitivity with more substantial and extensive developments, particularly south of the railway line producing a greater level of sensitivity.

7.20 This area in general is described in the 'Landscape Sensitivity' report as providing an *'important role in preserving separation from Five oak Green and linear development extending out eastward from it'* (page 61).

7.21 As TWBC's Landscape Character Assessment has also stated, this is a sensitive location for development. Any large-scale development is likely to have considerable consequences for viewpoints to and from the High Weald AONB. Identified viewpoints and expected visual impacts are analysed in **Section 8.0** below.

8.0 Visual Analysis Review

8.0 Following the site survey and desk top study of the base-line landscape context, the proposals are deemed generally in keeping with both national and local policy in relation to landscape. However, the scale of the allocation site proposal will have harmful effects on the landscape character and openness in the Low Weald and will have visual impact on the ANOB to the south which will be hard to mitigate.

- 8.1 In terms of visibility the landscape is visually well contained from Whetsted to the west of the A228. However, there is also a strong association with the AONB to the south and there are frequent filtered views across the flat landscape from the higher land with oasts and small farmsteads and traditional hamlets distinctive features in the landscape. It is these smaller hamlets and solitary properties such as Capel, Sebastopol and Badsell Manor Farm (Grade II listed building) which will see the greatest change.
- 8.2 The areas to the north west and south west side of Paddock Wood which is comprised of a degraded and flat urban/ rural interface would coalesce with the new development. This would result in extensive urban sprawl which will be apparent from many viewpoints. This would impact on the setting on listed buildings such as Badsell Manor Farm, Stonecastle Farm and Moat Farm and the AONB.
- 8.3 The sample viewpoints descriptions below describe the potential residual visual effects.

Table 1: Viewpoint Description and Analysis

Viewpoint Location	Description of Existing View and Expected Residual Effects
Panorama 1	<p>Base-line Context: A view located North of private dwelling Sebastopol on PROW WT176, looking east and north east. The public footpath crosses the southern boundary of a large arable farmed field. The southern boundary of the field is well vegetated with mature trees including Oaks. There is a view across a field to Capel Garden Centre to the west and to the north east to the warehousing at Paddock Wood (approx. 1km distant). There is a glimpsed skyline view to the north downs.</p> <p>Visual Impact: There will be extensive and encompassing views of the development from this location. There will be a change from an urban fringe to a wholly urban character, with no perceived break in development to separate the two settlements of Whetsted and Paddock Wood.</p>
Panorama 2:	<p>Base-line Context: Adjacent to panorama 1 from within private rear garden of Sebastopol, looking east. The garden boundary hedgerow is sparse providing filtered views to the North and the south. There are clear views to Whetsted Wood which lies 300m to the south.</p> <p>Visual Impact: The proposed development will surround this location. There will be a change from a predominantly rural view to a view of suburban development.</p>
Panorama 3:	<p>Base-line Context: View North from the rear garden of Grade II listed Badsell Manor across and through a post and rail fence. There are open fields and wide skylines punctuated by mature boundary trees.</p>

	<p>Tudeley Brook runs along the Eastern boundary, beyond which are farmland and buildings associated with Badsell Manor Farm.</p> <p>Visual Impact: If the existing field boundary and woodland cope vegetation is retained, there will be a filtered view of the development beyond the tree line to the east. There is a proposed green corridor to the North with a SuDS area to the west.</p>
Panorama 4:	<p>Base-line Context: From PROW WT175 looking North across an expansive field of approximately 12Ha. Tudeley Brook flows along the West field boundary and the footpath runs adjacent until it reaches Whetsted Wood and the railway line, approximately 600m away. There is a very expansive character and mature boundary hedgerow trees reveal a barely discernible filtered view of the existing development at Paddock Wood.</p> <p>Visual Impact: Development will be prominent in the view with a wooded backdrop. The existing farm buildings will be in the foreground.</p>
Panorama 5:	<p>Base-line Context: View north east to where PROW WT175 and WT179 converge. There are existing filtered views to Paddock Wood through the vegetated field boundaries to the east. There is a large open expanse of green space intersected by well used footpaths. Whetsted wood lies to the West.</p> <p>Visual Impact: If the existing field boundary vegetation is retained there will be filtered view to the proposed development.</p>
Panorama 6:	<p>Base-line Context: From PROW WT179, in front of existing dwellings on Eastwell Close, Paddock Wood. There is a sense of enclosure due to the mature boundary trees, but a large skyline is evident and there is a view to the AONB to the south. Well-trodden paths indicate well used paths and a sense of direction.</p> <p>Visual Impact: Development will be prominent in the view and there will be a change from an urban fringe to a wholly suburban character.</p>
Panorama 7:	<p>Base-line Context: East from PROW WT179 which extends from the A228, along the southern edge of the railway line and Whetsted Wood. There are far reaching views to the south across an open field. Houses on Badsell Road can be glimpsed through a gap in the hedgerow. The ANOB ridgeline forms a backdrop to the view.</p> <p>Visual Impact: If the existing field boundary and vegetation lining Tudeley Brook is retained there will be a filtered view of the proposed development.</p>
Panorama 8:	<p>Baseline Context: From PROW WT176, looking east from the far side of the A228 in the settlement of Whetsted. The path crosses the main road and continues to the proposed site boundary. The hedgerows that border the A228 are generally dense, however in this location they are low and have few hedgerow trees, allowing views into the development site.</p> <p>Visual Impact: The village of Whetsted is screened from the development from the roadside vegetation along the A228. Gaps or lower sections of hedgerow will reveal a direct view of the proposed</p>

	development emerging above the roadside vegetation from where the PRoW extends to the A228.
Panorama 9:	<p>Base-line Context: Looking from west to North from PRoW WT176A and a track to properties at Eastlands across agricultural holding. There is an open outlook from the edge of the urban fringe comprising Dan Trading Estate, mobile park, and depot.</p> <p>Visual Impact: There will be a direct view into proposed parcels of development which flank PRoW WT175 which extends North from WT176A .</p>
Panorama 10:	<p>Base-line Context: View south and west from WT176A from adjacent Eastland Cottages. Higher ground is visible emerging above and through field boundary. Eldon Way Industrial Estate is glimpsed in the distance adjacent Whetsted Wood. A predominantly urban fringe location. Tall coniferous hedges provide a sense of enclosure and are a visual detractor.</p> <p>Visual Impact: There will be a direct view to proposed development which will form an extension to the established settlement boundary.</p>
Panorama 11:	<p>Base-line Context: View North from PRoW WT176 from northern side of 3 Eastlands. A rural and open outlook across farmland although there are urban elements such as Capel Garden Centre, and a conifer belt on the A228. There is a distant view to the north Kent Downs AONB scarp ridgeline.</p> <p>Visual Impact: There will be a view into several parcels of development. If the tree line is retained the view of the far parcel will be filtered.</p>
Panorama 12:	<p>Base-line Context: View south to west from PRoW WT176. There is a view to the railway line with the higher land of the High Weald AONB visible in the distance. There are urban elements - Eldon Way Industrial Estate is visible adjacent to Whetsted Wood but it is generally a rural outlook.</p> <p>Visual Impact: There will be an extensive view into the proposed development parcel.</p>
Panorama 13:	<p>Base-line Context: View west from Ringdon Avenue above and through gaps in field boundary vegetation across farmland to Badsell Road and Badsell Manor Farm.</p> <p>Visual Impact: There will be a direct view to and across a proposed wedge of development extending out from the established settlement boundary.</p>
Panorama 14:	<p>Base-line Context: Expansive and panoramic view from Brenchley Millenium Viewpoint approximately 3km south east of the proposed development. View is directed across the Low Weald to the North Kent Downs AONB scarp ridge line beyond. The full extent of Paddock Wood is visible. Many inappropriately large buildings are a visual detractor.</p> <p>Visual Impact: The full tranche of additional urban sprawl will be revealed. There will be no perceived separation between Whetsted and Paddock Wood and the separation between Five Oak Green and Paddock Wood vastly decreased – less than half of the current</p>

	separation gap. The combined cumulative effect of both the Tudeley Garden Village and Paddock Wood and East of Capel development proposals will be visible and comprise a significant component of the view.
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9.0 Conclusion

9.0 This analysis has set out the baseline and visual context of the proposed allocation site. Paddock Wood and east of Capel is located on the edge of the Metropolitan Green Belt in an area which is subject to unprecedented pressure for housing, particularly affordable housing. This proposal would contribute to the TWBC's housing provision shortfall and indeed the landscape has some capacity to accept development close to Paddock Wood which could contribute to the local authority housing land deficit.

9.1 However, the scale of the present proposal seen in context with other potential and consented development will have harmful effects on the landscape character and openness within the setting of the High Weald AONB and Metropolitan Green Belt, which will be hard to mitigate. There are currently three consented smaller residential sites located on the southern and eastern built settlement edges of Paddock Wood (up to 1,126 homes), and another Garden Village proposal at Tudeley (2,800 homes). These sites will have considerable and harmful cumulative effects on what is at present open countryside within the Metropolitan Green Belt.

9.2 The five purposes of Green Belt designation are:

- To restrict unrestricted urban sprawl;
- Prevent coalescence of neighbouring settlements;
- Safeguard the countryside;
- Protect the setting and character of historic towns; and
- Assist or encourage urban regeneration. There are many derelict brownfield areas within the local plan area requiring urban regeneration, which are more sustainable locations and better served by public transport.

9.3 This level of proposed development is inappropriate for this location even if the area is removed from Green Belt and will have the following consequences:

- **Encroach extensively into open countryside**
The proposed allocation site is situated in an area currently designated as Green Belt, a functional designation to prevent coalescence and maintain

openness between settlements. Green Belt designation is essentially a planning matter, however in visual matters, if this area is removed from the Green Belt and compensatory land provided, the effects on the surrounding extant Green Belt will be detrimental, with a reduction in perceived openness and a perceived sprawl of development within the Low Weald landscape from Tonbridge to Paddock Wood;

- **Reduce the gap between settlements establishing coalescence**
Whetsted and Paddock Wood will appear to coalesce and the gap between Five Oak Green and Paddock Wood will be than halved from approximately 1km to 400m. This reduced size of gap will be barely discernible at a distance and the full extent of cumulative development (consented and proposed) will be visually intrusive in views from adjacent higher ground;
- **Greenfield Development**
There are limited public transport facilities, and this is not a sustainable location.
- **Have a visual impact on views in and out from the historic settlements of Capel and Tudeley**
Both Tudeley and Capel are typical Low Weald hamlets recognised as retaining vernacular character and local distinctiveness. The proposal will impact on this character and visually impact on the setting of these historic settlements;
- **Impact on the setting of many Listed Buildings**
The hamlets of Tudeley and Capel which have grown up around Grade I churches, and the cluster of listed features and buildings associated with Badsell Manor Farm (less than 50m from development) will see visual impact and a degradation in their setting; and
- **High level of development into the immediate setting of the AONB**
The allocation site will have visual prominence in panoramic views from the High Weald AONB to the south (refer to Figure 4 Photosheet 7 Viewpoints 13 and 14). The urban/rural fringe boundary at Paddock Wood is already degraded by expansive and inappropriately large-scale sprawling development on the south and western side, which is highly visible from certain viewpoints.

9.4 In paragraph 136 of the NPPF it says Green Belt boundaries should only be altered in *'exceptional circumstances'* which are *'fully evidenced'*. These proposals do not meet these requirements.

9.5 In 'Tunbridge Wells Landscape Character Assessment' (2017), it is suggested that the majority of any future development within this landscape character area should be situated along transport corridors and at settlement edges with a gradation in building height to

provide a sympathetic transition from urban to rural fringe in this vulnerable location. Some limited development may be accommodated at the existing settlement boundary, particularly to the north or immediately south west of Paddock Wood, but the scale of the present allocation site proposal is inappropriate in scale and extent, even with the large extent of green infrastructure mitigation proposed.

10.0 References

The Countryside Agency (now Natural England) Countryside Character Volume 7: South East and London (First published 1999 and now extensively updated)

NPPF (Amended, 2019)

Guidelines for Landscape and Visual Impact Assessment (GLVIA3) published in April 2013 by the Landscape Institute and the Institute of Environmental Management and Assessment

MAGIC. 2017. Magic. [ONLINE] Available at: <http://www.magic.gov.uk/>. [Accessed December 2020].

Tunbridge Wells Landscape Character Assessment (LUC, 2017)

Landscape Sensitivity Assessment of Settlements in Tunbridge Wells: Paddock Wood, Horsmonden, Hawkhurst and Cranbrook (LUC, 2018)

The Landscape Assessment of Kent (Jacobs Babbie, October 2004)

FIGURE 1:
Constraints Plan

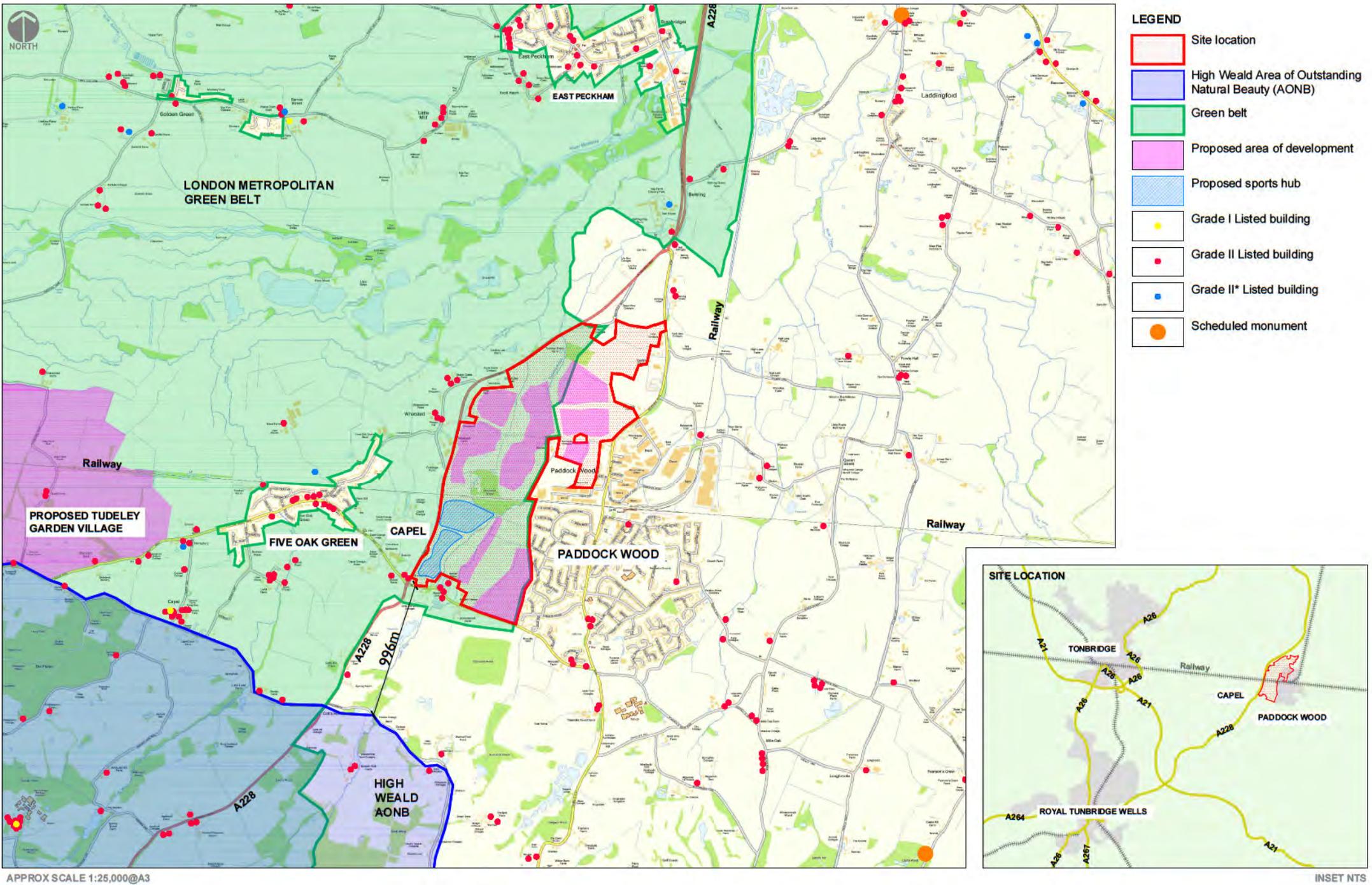


Figure 1: Constraints Plan
LAND AT EAST CAPEL

FIGURE 2:
Base-line Context

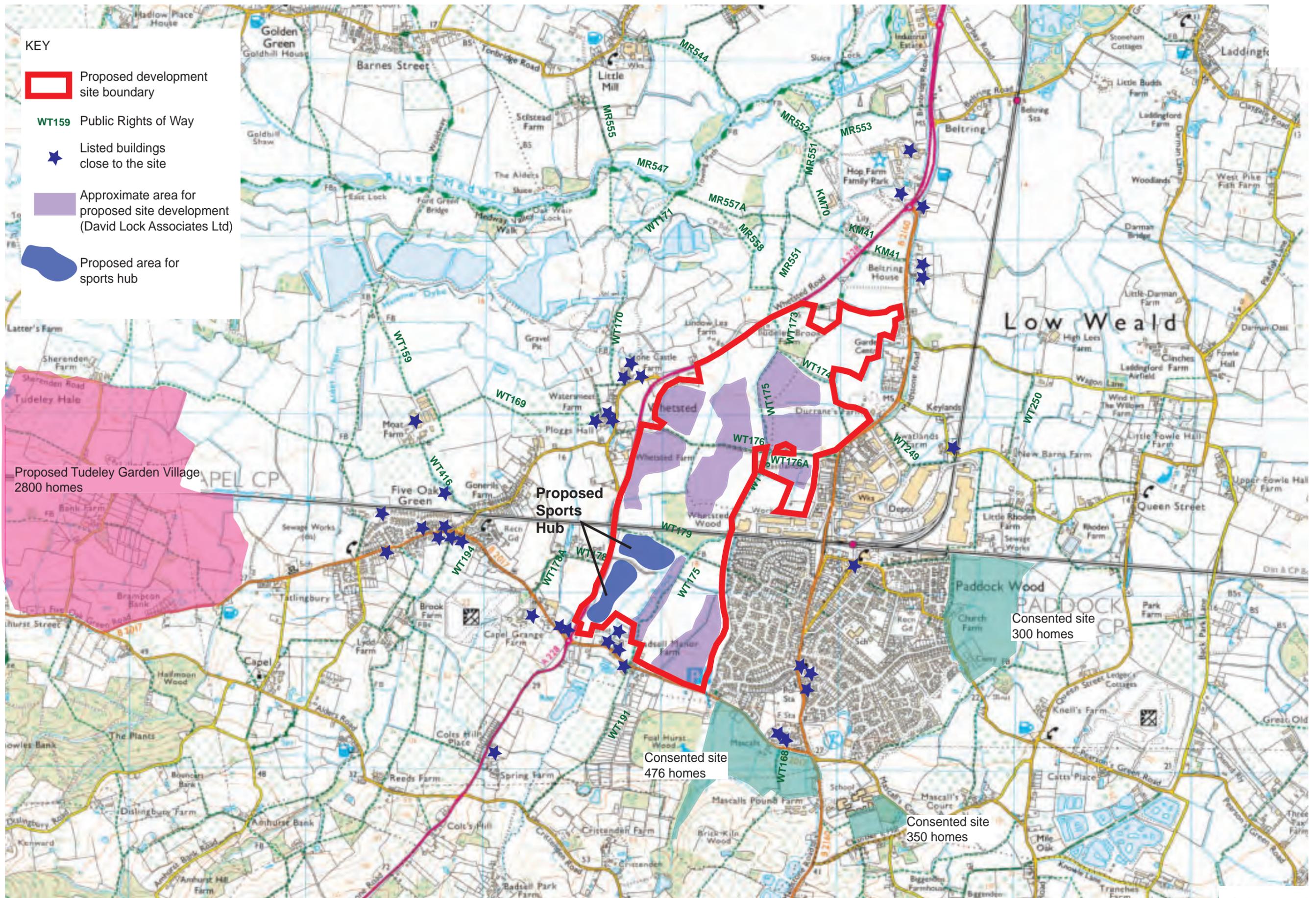


Figure 2. Baseline context
LAND AT EAST CAPEL

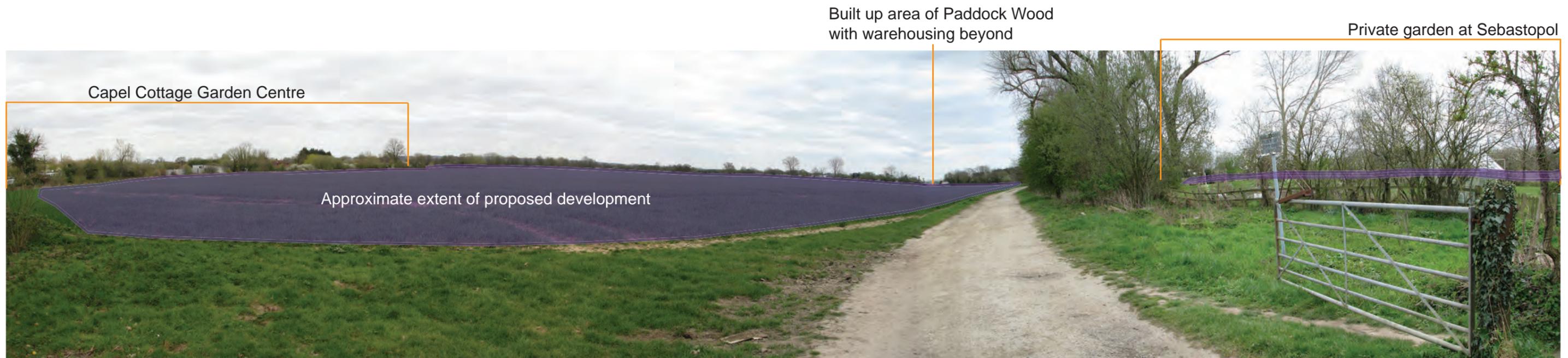
FIGURE 3:
Photographic Viewpoint Location Plan



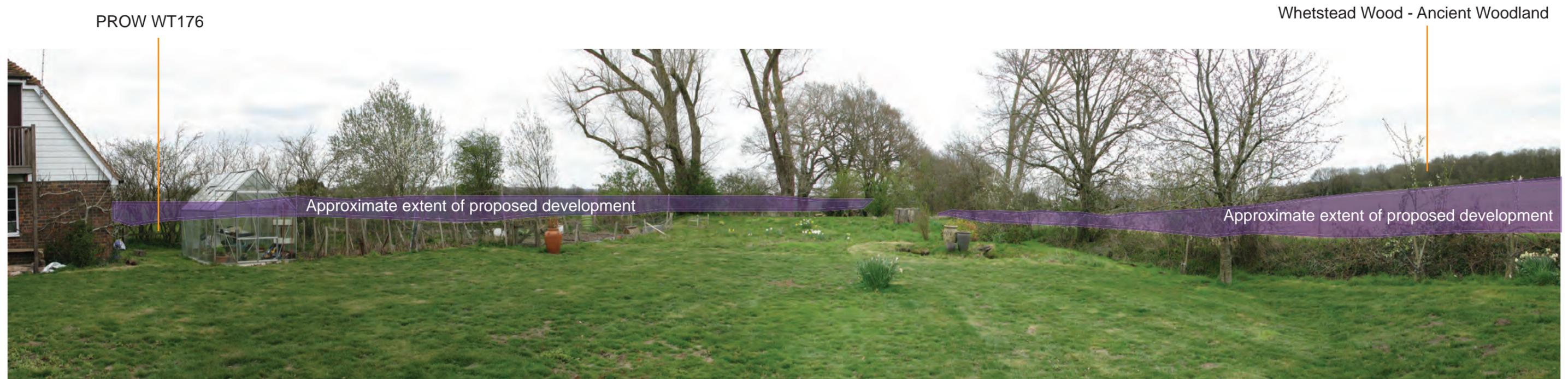
Figure 3. Photo Locations

FIGURE 4:

Photo Sheets 1-7



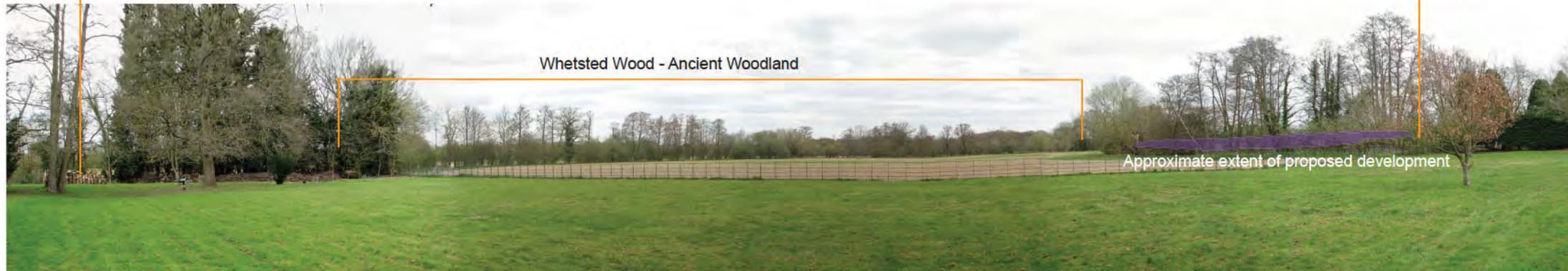
Viewpoint 1. Viewing North East from PROW WT176 with property Sebastopol behind.



Viewpoint 2. Viewing East from rear garden at Sebastopol.

Western boundary of Badsell Manor

Tudeley Brook



Viewpoint 3. Viewing North from rear garden of Badsell Manor.

Tudeley Brook

PROW WT175

Barn at Badsell Manor Farm



Viewpoint 4. Viewing North from PROW WT175 and West of Badsell Manor Farm

Edge of Whetsted Wood PROW WT175 PROW WT179 Property on Eastern edge of Paddock Wood



Approximate extent of proposed development beyond field boundary

Viewpoint 5. Viewing North East from junctions or WT179 and WT175.

Property on Eastern edge of Paddock Wood

PROW WT179 Edge of Whetsted Wood



Approximate extent of proposed development
Additional development beyond field boundary

Viewpoint 6. Viewing South and West from PROW WT179



Viewpoint 7. Viewing East and South from WT179.



Viewpoint 8. Viewing East from WT176 at Whetsted from the West side of the A228 Maidstone Road



Viewpoint 9. Viewing West and North from WT176A, Track leading to properties at Eastlands.



Viewpoint 10. Viewing South and West from WT176A from Eastlands Cottages.



Viewpoint 11. Viewing North from PROW WT176 from the North side of property 3 Eastlands.

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Viewpoint 12. Viewing South and West from WT176.



Viewpoint 13. Viewing West from Ringdon Avenue.



Viewpoint 14. Viewing North west from Brenchley Viewpoint in the High Weald AONB approximately 3km to the Southeast.

