

**REPRESENTATIONS TO TUNBRIDGE WELLS BOROUGH COUNCIL
DRAFT LOCAL PLAN (REGULATION 18)**

LAND TO THE EAST OF HORSMONDEN

NOVEMBER 2019

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1.0 INTRODUCTION

- 1.1 These representations have been prepared by Persimmon Homes in response to the Tunbridge Wells Borough Council Draft Local Plan Regulation 18 Consultation (hereafter referred to as the 'draft Plan').
- 1.2 Persimmon Homes have several interests within Tunbridge Wells Borough which are being promoted through the Local Plan process including land at Paddock Wood, land at Horsmonden and land at Cranbrook.
- 1.3 These representations have been prepared in respect of Land to the East of Horsmonden (hereafter referred to as 'the Site') which has received a draft allocation, under Policy Reference AL/HO3.
- 1.4 These representation should be read alongside the following supporting submissions:
- Preliminary Site Layout (prepared by Persimmon Homes)
 - Transport Appraisal (prepared by Markedis Associates)
 - Landscape Statement (prepared by James Blake Associates)
- 1.5 These representations, and the supporting submissions, demonstrate that allocation AL/HO3 is deliverable, and that the Site can deliver dwellings within the early part of the Plan period. The representations also demonstrate that the proposed allocated land can accommodate approximately 150 dwellings in accordance with the requirements of the draft Plan and the emerging allocation policy.
- 1.6 Persimmon Homes support the draft Plan in principle, especially the proposed allocation of the Land to the East of Horsmonden.
- 1.7 Notwithstanding our support for the draft Plan we are seeking some clarifications and amendments to the draft Plan and the supporting evidence base, to ensure that the emerging development strategy and allocation is robust and Sound.

Proposed Allocated Land - Land to the East of Horsmonden

- 1.8 The Site is located in a sustainable location on the north eastern edge of Horsmonden, within walking distance of the village's services and facilities. The Site extends to approximately 14.7ha and comprises two distinct areas an orchard area to the north and a paddock area to the south-west.

Adjacent Consented Land – Bassetts Farm

- 1.9 Outline Planning Permission has been granted for development of up to 30 no. residential dwellings on land immediately to the south of the proposed allocation (under reference TW/15/505340/OUT). The consented land is owned and controlled by Persimmon Homes.
- 1.10 It is envisaged that the consented land and the proposed allocated site could be brought forward together to deliver a well-designed sustainable extension to the village.

Structure

1.11 These representations are structured as follows:

- Section 2 sets out our observations on the emerging Development Strategy for the Borough and sets out several recommendations to enhance the robustness and soundness of the Development Strategy;
- Section 3 sets out our comments on the proposed development strategy for Horsmonden Parish;
- Section 4 provides a detailed overview of the Site and surroundings;
- Section 5 sets the vision and development potential of the Site, demonstrating deliverability;
- Section 6 provides commentary on the development management policies in the Draft Plan; and
- Section 6 provides a summary and conclusion.

2.0 DRAFT LOCAL PLAN - DEVELOPMENT STRATEGY

2.1 As noted above Persimmon Homes are supportive of the draft Plan and the allocation AL/HO3 in particular.

We are thereby keen that the Plan progresses successfully through the Local Plan process including examination. To this end we set out below a number of observations and recommendation concerning the emerging Development Strategy.

Housing Requirement

2.2 Table 1 of the Reg 18 plan identifies the housing need for the period 2016 – 2036 to be 13,560 dwellings (678dpa). This is said to be based upon the standard methodology (2014 based household projections (published July 2016)), projected household growth in Tunbridge Wells for the period 2019-2029 and the affordability ratios published in April 2019. Whilst we believe the figure to be 682dpa, we note para 3.2.1 of the Housing Topic Paper (HTP) suggests the figure of 678 is being used as it is based upon submission in 2020. This being the case the plan when submitted needs to be clear on this point and all associated calculations clarified accordingly. We also believe, for the reasons set out below, that the plan period should also be amended and start in 2020 not 2016 as drafted.

Whether the Plan should provide for more than the minimum local housing figure

2.3 The plan should, given ID: 2a-010-20190220 of the PPG, consider whether it might be appropriate to plan for a higher housing need figure than the standard method indicates given issues such as local affordability.

2.4 The housing needs survey 2018 identifies a net affordable housing need of 443dpa. As policy H5 looks to deliver 40% affordable provision on all greenfield sites of 9 (+) dwellings, and acknowledging that not all sites provide affordable housing, in order to meet 100% of the affordable requirement one would conservatively need to deliver circa 1,107 dpa over the plan period. This is clearly significantly greater than the figure generated by the standard method, (678/682dpa) and whilst the standard method takes into account affordability issues, this does beg the question as to whether TWBC need to consider whether it might be appropriate to plan for a higher housing need figure than the standard method indicates. If nothing else the SA should in our opinion assess this point.

2.5 In the context of the above we also note that the figure of 678/682dpa is the minimum local housing need figure. It is capped at 40%. The uncapped figure is in fact 762dpa . This figure would better be described as the actual housing need, with 678/682dpa simply being the minimum Local Housing Need figure defined by the standard method. Again, given the scale of the affordable housing need the HTP and the SA should

in our opinion consider the issue of the plan providing for more than the minimum local housing need figure.

2.6 Finally, having regard to the issues around the Duty to Cooperate, there is the issue of Sevenoaks District Councils (SDC's) unmet need. Whilst we note that the SA does consider a growth option that encompasses SDC's unmet need (option 7 – see below), para 6.2.2 of the SA appears to dismiss this option on the basis that it was assumed that the additional 1,900 dwellings would essentially be located within the AONB. It is not clear how this conclusion has been reached. In addition there is nothing that allows one to undertake a like for like comparison of the SA findings on option 7 (as set out in table 14) against the options considered in the earlier SA and the chosen option – such that the rational for this decision does in our opinion require further clarification.

The Plan Period

2.7 The Government's Planning Practice Guidance (ID: 2a-004-20190220) indicates that when setting the baseline, the projected average annual household growth over a 10 year period should be calculated and that "this should be 10 consecutive years, with the current year being used as the starting point from which to calculate growth over that period". Thus, the plan period should start at 2020 if it is to address the OAHN identified by the Standard Method of 678 (2020-2030) rather than 682 (2019-2029).

Duty to Cooperate

2.8 Having reviewed the interim Duty to Cooperate Statement we note that housing is seen as a cross boundary strategic issue and that a Statement of Common Ground (SoCG) has already been signed with both Maidstone Borough Council (MBC) and Sevenoaks District Council (SDC) that look to address this issue, amongst others. We also note that the SoCG with MBC is dated August 2016 and that with SDC is dated May 2019.

2.9 As the Borough Council will be aware, the Duty to Cooperate places a legal duty on local planning authorities to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. We do not believe, given the above, that the SoCG with MBC and SDC can be seen as demonstrating actively and ongoing engagement at this stage of the plan making process – we would expect there to be a rolling program of engagement to address matters as they arise through the consultation on the Reg 18 and Reg 19 plan. Thus, the SoCG would need to be updated accordingly.

2.10 In addition to the above, we are mindful of the recent correspondence between SDC and their Inspector, especially documents ED37 and ED40. It is clear from the latter that the Inspector did not accept that

reliance on a review of the Plan to address the issue of SDC's unmet need was appropriate or complied with the duty, which applies specifically to plan preparation, which as the Borough Council are aware ends when the plan is submitted for Examination. Thus, this issue needs to be thoroughly examined and addressed in the SoCG that are submitted prior to submission of the Plan. Which means TWBC need to liaise with SDC about where they now are with this issue and the TWLP needs to clearly demonstrate why it cannot, if that is the case, help address SDC's unmet need.

Sustainability Appraisal

- 2.11 TWBC must comply with Directive 2001/42/EC (the SEA Directive) and the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA Regulations) as required by the Planning and Compulsory Purchase Act 2004 while preparing the Local Plan.
- 2.12 TWBC are required under Article 4 of the SEA Directive to ensure that their environmental assessment is carried out "during the preparation of the plan". Therefore, any changes or modifications to the emerging Local Plan prior to its adoption must be considered as part of the environmental assessment.
- 2.13 Regulation 12(2) SEA Regulations provide that the Sustainability Appraisal of the Local Plan must identify, describe and evaluate the likely significant effects on the environment of implementing the particular development plan and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme.
- 2.14 Section 6 of the Sept 2019 SA reviews the growth strategy. It demonstrates that six options were considered at Issues and Options:
- Growth Strategy 1 – Focused Growth - growth focussed largely on existing urban areas;
 - Growth Strategy 2 – Semi Dispersed Growth - growth focussed largely on urban areas plus some larger villages;
 - Growth Strategy 3 – Dispersed Growth - growth distributed proportionally across all existing settlements;
 - Growth Strategy 4 – Growth Corridor Led Approach - growth focussed on the A21 corridor near Royal Tunbridge Wells and Pembury;
 - Growth Strategy 5 – New Freestanding Settlement - growth within a new, free-standing settlement; and
 - Growth Strategy 6 – No Local Plan.

Following consultation two further options were considered:

- Growth Strategy 7- Growth including Sevenoaks Unmet Need

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- Growth Strategy 8 - Dispersed Countryside Growth

- 2.15 Para 6.2.4 of the Sept 2019 SA suggests that Growth Strategy 5 had the highest number of positive scores and lowest number of negative scores. It also explains that: *'This option, which has been taken to embrace an enlarged town or village based on garden settlement principles as well as a new freestanding garden settlement, is therefore proposed to be integral to the preferred development strategy for the borough.'*
- 2.16 Notwithstanding the above the Sept 2019 SA also explains at para 6.2.6 that it would neither be reasonable in SA terms, nor practical, to focus unduly on new or expanded settlements as the sole focus of meeting the housing needs of the borough. And that as such, as set out in para 6.2.8 and 6.2.9 the growth strategy incorporates both growth strategies 3 and 5.
- 2.17 In order to fully understand the rationale behind the growth strategy, one has however to refer back to the Sustainability Appraisal Issues and Options Report May 2019, as it is chapters 4 and 5 of this documents that appraises each of the proposed growth options against the Sustainability Objectives, considers how one could mitigation adverse effects and maximise the beneficial effects, and recommends the further investigation of growth options 5 and 4. Whilst para 5.3.1 goes on to advise that: 'it is pertinent to note that this recommendation is subject to locational constraints' we are concerned that not only does one have to go on a paper chase to fully understand the rationale behind the chosen growth/ spatial strategy, but that the findings of the May 2019 SA differ from those of the Sept 2019 SA without any explanation. This needs to be rectified in the Reg 19 SA.
- 2.18 Whilst the SA does in our opinion review the reasonable alternatives to the growth options/ spatial strategy, and the associated options for the scale and location of growth proposed within the new settlement/ enlarged town it does in some areas require a paperchase and in others is not perhaps as clear and robust as it could be, such that we believe the SA should be reviewed and updated when the Reg 19 plan is published.

3.0 HORSMONDEN PARISH STRATEGY

3.1 This Section provides comments and observations in respect of the proposed development strategy for Horsmonden Parish.

Policy STR/HO1

3.2 The strategy for Horsmonden is set out at draft Policy STR/HO1. The strategy directs between 225-305 new dwellings to the settlement to be delivered on three allocated sites. The strategy also requires enhanced pedestrian and cycle connectivity, the provision of new open space and green infrastructure, and contributions towards the delivery of infrastructure improvements including primary and secondary education; health and medical facilities; community centre and sustainable transport opportunities.

3.3 It is considered that the development strategy for Horsmonden is broadly appropriate and Sound. The proposed strategy will ensuring that the additional housing required to help meet local housing needs, including need for affordable housing, is supported by delivery of appropriate new and enhanced infrastructure.

3.4 The provision of the new and enhanced infrastructure required under STR/HO1 will not only meet the needs of new residents but also benefit the existing community.

3.5 It is thereby considered that the development strategy for Horsmonden will help ensure the sustainable growth of the village over the plan period, supporting and enhancing the viability and the vitality of the village whilst also protecting the character and distinctiveness of the village.

Draft Infrastructure Delivery Plan

3.6 The draft Infrastructure Development Plan (IDP) identifies several infrastructure improvements that are required to support of growth at Horsmonden, including:

- new health centre/doctors surgery to serve the village and the surrounding area;
- expansion of the existing primary school by up to 1 FE to serve the area;
- new green infrastructure and pedestrian/cycle links/PROW enhancements (including the proposed Hop Pickers Way cycle link).

3.7 Whilst the school extension and the new health centre are required to meet the needs of Horsmonden, they have been identified as come forward on safeguarded land identified as part of Policy Allocation AL/HO3. Whilst we are supportive of the safeguarding of land for the provision of new infrastructure to

support the sustainable growth of Horsmonden, it is also important that responsibility for the delivery the facilities, is made clear in the IDP. **Given that these facilities are to serve the wider needs of Horsmonden, it is suggested that this safeguarded land is dealt with by way of a separate allocation specifically related to the delivery of the school and health centre.** This is discussed further in Section 6 below.

3.8 Given the relatively low levels of traffic in the local area, and comparatively limited the scale of growth proposed at Horsmonden, the draft IDP does not identify any strategic highways improvements to be delivered within Horsmonden Parish in support of the development strategy.

3.9 Notwithstanding the absence of a requirement for highways improvements, the need to support sustainable opportunities in the village is noted and is supported by Persimmon and can be facilitated through the delivery of our Site. This is discussed further in Section 6 below.

4.0 LAND TO EAST OF HORSMONDEN

Site Location & Description

- 4.1 The Site is located in a sustainable location on the north eastern edge of Horsmonden, within walking distance of the village's services and facilities including local bus stops, a village shop, post office, pharmacy, doctor surgery, public house, nursery and primary school.
- 4.2 The Site extends to approximately 14.7ha and comprises two distinct areas an orchard area to the north and a paddock area to the south-west. The Site is positioned on the side of a very gently sloping valley; Goudhurst Road runs along the valley contours, therefore in terms of topography the application Site slopes upwards from south to north. A Public Right of Way (PROW) traverses the Site north to south; and PROW also runs along the northern boundary.
- 4.3 The north boundary of the Site is defined by a field boundary and a PROW. Beyond the northern boundary is agricultural land which is currently given over to orchards. To the east of the Site is an area of woodland which enclose the site to views from the east. The western boundary is defined by a former railway line which is now heavily vegetated by mature trees and hedgerows. Beyond the former railway line is a mature residential area which comprises a range of 2 - 2.5 storey semidetached and detached units constructed in the last 20 years. The palette of materials is varied, including red/brown brick, timber weather boarding, cream painted render and tile hanging. To the south of site is situated a terrace of housing and a large detached property situated in extensive grounds. Beyond that is a complex of former farm buildings (including a Listed Building) and a former orchard. Outline Planning Permission has been granted for the redevelopment of the former farm buildings (this is considered further below).
- 4.4 The Site is located within Flood Risk Zone 1 (less than 0.1% annual probability of tidal and fluvial flooding), which is the lowest zone in terms of probability of flood risk. This is confirmed by the Environment Agency flood maps.

Adjacent Consented Development Site – Bassetts Farm

- 4.5 Outline Planning Permission has been granted for development for up to 30 no. residential dwellings on land immediately to the south of the proposed allocation (reference TW/15/505340/OUT). The consented site, which is known as Bassett Farm, is owned and controlled by Persimmon Homes.

4.6 The consented development includes detailed approval for a site access (simple junction arrangement) with Goudhurst Road. As is discussed in Section 5, the approved junction arrangement could provide access to the allocated land and is of sufficient scale to accommodate the traffic generated by the proposed allocation.

4.7 It is envisaged that the consented site and the (proposed) allocated site could be brought forward together to deliver a well-designed sustainable extension to the village. This is discussed further in Section 5 below.

Suitability, Availability and Achievability

4.8 The Site has been assessed through the Strategic Housing and Economic Land Availability Assessment (SHELAA, 2018). The SHELAA identifies the Site as Parcels 297 and 82. The SHELAA has been utilised as part of the evidence base for the emerging Local Plan.

4.9 With regard to suitability the assessment states:

“The site lies adjacent to the LBD [Limits of Built Development] and is likely to be sustainable in this context. It would for a logical extension to the built form. [Whilst] there is concern about landscape sensitivity in parts...[this] could be addressed by site layout and design”

4.10 As is discussed in Section 5 we have already begun assessing how the landscape of the surrounding area can be protected and enhanced by the proposed development.

4.11 With regard to availability the assessment notes that the Site is within a single ownership. Persimmon can confirm that they are working with the landowner to deliver this Site. In addition Persimmon own the adjacent land through which access to the allocated land can be provided, further ensuring the availability and deliverability of the Site.

4.12 With regard to achievability the assessment notes that the Site can be delivered in the Plan period. Persimmon Homes can confirm that, as a national house builder, should the Site be allocated it would our intention to deliver the Site in the early part of the Plan period, with units coming out of the ground within 5 years. This is discussed further in Section 5 below.

Sustainability Appraisal

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- 4.13 The Sustainability Appraisal (SA) prepared by TWBC (dated September 2019) makes up an important part of the evidence base of the Draft Plan. The SA examines the Site within the geographical scope of Horsmonden and assesses its role in meeting the Sustainability Objectives.
- 4.14 It is noted that the SA notation in respect of the site specific assessment appears to be incorrect. The Site is cross referenced with draft Allocation AL/HO4 when it is in fact AL/HO3. It is therefore unclear if which assessment relates to the Site. **This error needs to be resolved for the Reg 19 SA.**
- 4.15 Notwithstanding the confusion arising from the incorrect notation, it is noted that both AL/HO3 and AL/HO4 identify that the development would deliver the major positive of meeting local housing needs. In addition the assessment identifies several other positives including access to education and employment. The majority of other objectives are neutral. Whilst a limited number of objectives scored negatively, it is considered that these can be mitigated through layout design, landscaping and sustainable travel measures – these issues are discussed further in Section 5.

Policy AL/HO3

- 4.16 The Site has been identified as a draft allocation in the Regulation 18 Draft Local Plan. The allocation of the Site under Policy AL/HO3 sets out that the Site is allocated for a mixed use scheme, providing approximately 100-150 residential (C3) dwellings, as long as Site specific requirements are met, including:
- 1. A highways assessment will inform the location of vehicular access into the site allocation area (see criterion 5 of Policies EN 1: Design and other development management criteria and TP 2: Transport Design and Accessibility);*
 - 2. Provision of pedestrian links into the village centre, including improvement of footway located on the north side of Goudhurst Road;*
 - 3. Provision of pedestrian links between western part of site and Bassetts Farm to be explored;*
 - 4. Provision of link to, and preserve amenity of, Public Rights of Way WT340a and WT341 (see criterion 4 of Policy TP 2: Transport Design and Accessibility);*
 - 5. No built development on the route of the Hop Pickers 'Line unless it can be demonstrated that the route can be maintained (see Policy TP 5: Safeguarding Railway Land);*
 - 6. Archaeological assessment required (see Policy EN 7: Heritage Assets);*

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- 7. Built development on the eastern area of the site to be a lower density informed by a landscape assessment (see Policies EN1: Design and other development management criteria and Policy EN 20: Rural Landscape);*
 - 8. Provision of on-site amenity/natural green space and children's play space and improvements to existing allotments, parks and recreation grounds and youth play space in accordance with the requirements of Policy OSSR2: Provision of publicly accessible open space and recreation. To include the provision of a community orchard;*
 - 9. Safe guarding of land to north for future school expansion, as defined on the site allocations plan;*
 - 10. Safeguarding of land within the site for the provision of a new health centre/doctors surgery;*
 - 11. Scheme to take account of, and respect, the setting of New Bassetts cottages;*
 - 12. Demonstration through the submission of relevant and proportionate archaeological investigations (as part of any planning application) that the proposal will not cause a materially harmful impact on the archaeological environment (see Policy EN 7: Heritage Assets).*

4.17 Section 5 below demonstrates that Persimmon Homes can comply with requirements of the draft Allocation Policy AL/HO3 to deliver approximately 150 dwellings and associated open space and infrastructure.

5.0 DEVELOPMENT POTENTIAL

5.1 This Section seeks to demonstrate the development potential of the Site in accordance with the requirements of the draft allocation Policy AL/HO3. To this end Persimmon Homes have instructed consultants to undertake a preliminary landscape and transport appraisal for the Site. Given our ownership of the adjacent consented development site 'Bassetts Farm' we have undertaken these assessments to jointly consider these Sites, to explore how these two sites can be effectively brought forward together.

5.2 The following sets out the findings of these assessments, before setting out the proposed development parameters for the joint Sites.

5.3 Finally this section also sets out some key points in respect of delivery and contribution towards housing land supply.

Landscape

5.4 James Blake Associates (JBA) have conducted a preliminary landscape review of the Site (included at Appendix 1), factoring its current state, its position and relationship with the surrounding countryside, and the impact that any development may have on the Site and the surroundings.

5.5 The assessment identifies the following landscape sensitivities/characteristics and opportunities:

- Landform: the landform within the Site follows a shallow valley with the land rising to the north. Just beyond the Site to the north lies a ridgeline at approximately 75m AOD. Any proposed development should avoid breaking the skyline.
- PRow network: PRow WT340A, PRow WT338 and PRow WT341 run through or abut the site boundary. These connections should be retained and provision enhanced through the introduction of additional connecting footpaths;
- Visibility and Views: From the northernmost boundary of the Site there are panoramic views across the wider landscape. Views towards the Site are also possible from the other side of the shallow valley to the south. Again, any development on Site should avoid breaking the ridgeline;
- Woodland structure including ancient woodlands: The Site boundaries include some strong tree belts in places. These features should be retained, enhanced and reinforced with native buffer planting;
- Tranquillity of the Site: Due to the rural nature of local landscape and association with the nearby High Weald AONB, there is a sense of tranquillity within the Site and its surroundings;

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- Listed Buildings: The National Heritage List for England (NHLE) indicates that there are a number of Listed Buildings in close proximity to the Site. The setting of these buildings will need to be carefully considered.

5.6 JBA thereby concluded that *“The Site is considered to be a suitable location in landscape and visual terms for development subject to some landscape considerations”*.

5.7 JBA have found that based on the landscapes present, the Site could suitably accommodate an appropriate development scheme, in line with what has been proposed in Policy AL/HO 3. This would be best achieved through the implementation of a sensitively designed masterplan which incorporates the following key design principles:

- The location of proposed development areas should respond to the landscape features and characteristics that give the landscape its sense of place and local distinctiveness. For this reason, development should be kept below the 60m contour line in order to avoid breaking the ridgeline. A detailed topographical survey should be undertaken to inform the extent of the built development area and the ridge heights of proposed dwellings.
- The built form should reflect the local settlement with the use of vernacular style materials wherever possible.
- Hard and soft landscaping materials should be complementary to the proposed dwellings and the local vernacular design.
- The use of dark/earthy tones will help to integrate the proposed development into the wider landscape, particularly any proposed dwellings towards the north of the Site.
- Proposed dwelling could adopt a vernacular style, or be more contemporary in style but with vernacular references in their design or materials.
- Existing boundary vegetation should be retained wherever possible and reinforced where necessary by new structural planting to provide screening value and create a wooded backdrop to the proposed development.
- Groups of trees within open space will soften the built form and integrate with the Green Infrastructure corridors, providing connectivity across the Site. A north-south view corridor from the ridge has been retained in order to allow panoramic views towards the High Weald AONB.
- The Site should look to provide opportunities for multi-functional green infrastructure to provide ecological, climate and recreational benefits.
- Residential streets and buildings should reflect the existing settlement form, with a transition in density and building height, creating a lower density settlement edge to the north and east.

5.8 A Landscape Strategy Plan (included within the landscape assessment) has been prepared in accordance with these requirements and thereby in accordance with the requirements of Policy AL/HO3.

Access

5.9 Markides Associates have a Transport Appraisal (TA) to assess the accessibility of the allocated land, alongside the adjacent committed site, and prepared a robust proposed transport strategy for the Site. This is included at Appendix 2.

5.10 The TA establishes that the site is an appropriate place for residential development, benefiting from being located within close proximity of a range of social infrastructure within the village that acts as typical trip attractors for residential land uses, ensuring residents are not wholly reliant on travel by private car to access essential services such as primary education, health and convenience retail.

5.11 Horsmonden also benefits from being served by a number of existing bus services that provide access to higher order settlements such as Royal Tunbridge Wells and Paddocks Wood, from which there are opportunities to access National Rail services.

5.12 The TA demonstrates that the vehicular and pedestrian access from Goudhurst Road, approved as part of the Bassett Farm planning permission (reference TW/15/505340/OUT) is suitable to serve the whole development. The proposed site access junction has also been demonstrated to operate within capacity, with no material impacts on through traffic on Goudhurst Road.

5.13 The development proposals will also include additional pedestrian access via the established public right of way network that runs north of the site via Back Lane.

5.14 The TA has undertaken a trip generation exercise and demonstrated that the development proposals are not anticipated to result in a significant increase in traffic levels, against an existing local highway network that Draft Local Plan evidence suggests operates within capacity anyway.

5.15 The development proposals will be designed in accordance with Manual for Streets and Kent Design Guide principles, future proofing connections with proposed infrastructure such as the Hop Pickers route to Paddock Wood, which runs adjacent to the site, and which will offer convenient and safe cycle access on traffic free routes.

5.16 The development proposals will also support and encourage sustainable travel via the implementation of a Travel Plan and is of a scale of development that will potentially be able to deliver improved public bus services and/or the creation of a demand responsive bus service that is branded to the site.

5.17 In summary, the TA has reviewed emerging transport related planning policy within the Draft Local Plan and concluded that residential development of the envisaged scale at this site would be in compliance.

Development Potential

5.18 Within the framework established by the landscape strategy and the access strategy we have prepared a preliminary parameters plan (included at Appendix 3) which demonstrates that the site can accommodate some 150 dwellings in accordance with the key requirements of allocation Policy AL/HO3.

5.19 The parameters plan has also includes our adjacent land at Bassetts Farm. When taken together with the Bassetts Farm site we anticipate that the Site could achieve approximately 175 dwellings.

5.20 With reference to the requirements of draft allocation Policy AL/HO3 the parameters the plan demonstrates the following development parameters can be achieved:

- A safe vehicular access from Goudhurst Road, via the Bassett Farm site;
- Provision of two safe pedestrian links into the village centre via Goudhurst Road (with delivery of the footway improvements approved under TW/15/505340/OUT) and Back Lane;
- Retention and enhancement of PROW through and adjacent to the Site, with linkages provided;
- Protection of the Hop Pickers' Line from development;
- Lower density development on the eastern part of the site;
- Provision of on-site amenity/natural green space (in the form of a potential community woodland area), children and youth play space;
- Consideration of New Bassett Cottages (Grade II listed buildings);
- Retention and enhancement of existing hedgerows and trees;

Delivery

5.21 The land at allocation Site AL/HO 3 is controlled by Persimmon Homes, a national house builder, and we are keen to bring the Site forward at the earliest opportunity alongside our adjacent land (Bassetts Farm).

5.22 To this end it is likely that we would seek full planning permission for the joint site for approximately 175 dwellings, with an application submitted shortly after adoption of the Local Plan.

5.23 Even allowing for 12 months for the planning process we would anticipate a start on site in the second year of the plan with units delivered no later than the third year of the plan period and the development completed by year six (assuming a delivery rate of approximately 60 dwellings per annum). In short the site can make a very early contribution to the Borough housing land supply.

6.0 AMENDMENTS TO AL/HO3

- 6.1 Persimmon Homes are supportive of the draft allocation. The previous section has demonstrated that the Site can be delivered in accordance with the draft allocation and early in the plan period, making an important early contribution to housing land supply.
- 6.2 Notwithstanding our support for the draft allocation we have some detailed comments and recommendation which we would like reflected in the Reg 19 iteration of the policy and supporting evidence base, most notably the IDP, to make the Plan Sound:

- **Development Quantum** – The analysis undertaken has demonstrated that the Site AL/HO3 alongside the consented development of Bassetts Farm can comfortably accommodate 175 dwellings.

We thereby request that the policy is updated to specifically identify AL/HO3 as having development potential for up to 150 dwellings. This will provide certainty and clarity about the capacity of the Site whilst also providing flexibility for detailed design considerations to be worked through as part of the development management process.

- **Site access** – as demonstrated in Section 5 below, the most appropriate and deliverable vehicular access to the Site is via the approved access through Bassetts Farm immediately to the south of the Site. This will provide a safe and deliverable vehicular access onto Goudhurst Road. Given that the Bassett Farm site is owned and controlled by Persimmon Homes this will avoid the need for the co-ordination of at least one additional land owner (which would potentially undermine the timely delivery of the site harming the authorities housing trajectory).

We thereby request that the policy is updated to specifically identify the access point to the allocation via the Bassett Farm development.

- **Safeguarded Land** – the allocation specifically identifies the land to be safeguarded for the school and the health centre, this is shown on Map 84.

We support the safeguarding of land in this location for the school and the community centre given its proximity to the existing school site and the ability to have its own access via Back Lane.

Further, as noted in the IDP, the school extension and the health centre are required to meet some existing local needs and also the need of all of new the development coming forward within village, not just the development within AL/HO3.

As such the requirement for this land is not fairly and reasonably related in scale and kind, or directly linked, to the housing coming forward on AL/HO3. As such a Section 106 requirement for the delivery of the safeguarded land may not be CIL 122 compliant (without a mechanism for recouping the cost of land from the other developments in the village which would benefit).

Further, neither the school nor the health centre will not be expected to be delivered by the developer, rather it will be brought forward by the infrastructure providers (namely the NHS Clinical Commissioning Group in respect of the Medical Centre and the Kent Local Education Authority in respect of the school extension) in accordance with their delivery programme. It is noted that the draft IDP explains that both the NHS CCG and the Kent LEA have further work to undertake to determine the scale of provision required in this location. Ambiguity on the responsibility for the delivery of infrastructure could lead to uncertainty and delay in the delivery of units on the Site, undermining the robustness of the Borough housing land supply assumptions.

Given that the safeguarded land will benefit all development sites coming forward in the village, and given the school and health centre will not be delivered by the developers, we request that the safeguarded land is subject to a separate allocation policy rather than being included within AL/HO3. This will allow for a much clearer framework for delivery with clear responsibilities. It will also allow the community land to come forward independently in accordance with the requirements and programme of the infrastructure providers and in accordance with the CIL 122 test.

We thereby also request that the IDP is updated to explicitly acknowledge that the safeguarded land will be delivered by the infrastructure providers in accordance with their delivery requirements and programme.

Persimmon Homes would of course provide CIL compliant contributions toward the delivery of necessary infrastructure improvements, secured by way of a Section 106 agreement, and we would therefore be keen to see necessary infrastructure delivered in a timely fashion.

7.0 DEVELOPMENT MANAGEMENT POLICIES

7.1 The draft Plan includes a full suite of draft Development Management policies. Whilst many of these policies seem reasonable in their approach and requirement, we have some detailed concerns in respect of several of these policies.

EN1 – Sustainable design and construction

7.2 The Council's choice of words in parts 1 and 2 of EN2 are confusing. The Council state that they will prioritise development in locations with frequent and easily accessible public transport or in locations that encourage active travel. The Council should not be seeking to "prioritise" certain development on the basis of their location through a development management policy. Any prioritisation should have been undertaken when sites are allocated. There is a risk that such policies begin to create a sequential test with regard the location of sites and their relative accessibility to services. We would suggest that parts 1 and 2 are deleted and replaced with policies that require development to consider how they encourage active travel and the use of public transport in relation to their location. This would be more consistent with national policy which recognises the need to limit travel and offer genuine choice in transport modes but also that solutions will vary between locations.

7.3 It is not clear what part 6 is trying to achieve and how an applicant would address this point. It would appear that the Council are seeking some form of flexibility within development to recognises the changing nature of how an occupant may use that building (as long as the use is within the same use class order). This is inappropriate and whilst the Council may encourage more flexible layouts there is no requirement in national policy or guidance to do so. We would therefore recommend that part 6 is deleted.

7.4 Part 7 requires development to seek to secure positive behaviour change and sites the provision of water fountains in a move discourage the purchase of single use plastics. However, we do not consider this policy to be consistent with national policy or that the consequences of this policy have been properly considered. In relation to the example provided we would ask – what type of development would be required to provide water fountains, how many water fountains would be necessary, who would maintain these fountains ensure they work and who would ensure they are clean and not a danger to public health. We appreciate the sentiment but there are wider consequences that do not appear to have been considered by the Council. If the Council consider infrastructure such as water fountains to be necessary it should consider this against to the tests set out in paragraph 56 of the NPFF and 122 of the CIL regulations.

EN3 - Sustainable Design Standards

7.5 We note that policy EN3 'Sustainable Design Standards' requires developers to obtain HQM 4 stars for schemes of 150 (+) from 2021.

7.6 We understand that the Home Quality Mark has been developed by BRE, and is a national standard for new homes, which uses a simple 5-star rating to provide impartial information from independent experts on a new home's design, construction quality and running costs. It is in effect part of the BREEAM family of quality and sustainability standards. The 'Top 10 Questions Asked by Planners – Answered' document published by the BRE suggests that 'Outstanding and 5 star ratings are incredibly challenging and are unlikely to be suitable as a blanket policy'. It also indicates in Table 2 (Conceptual policy), that for new homes of 200 (+) authorities should be looking to achieve HQM 3 stars OR HQM 2 star and level 4 on the Footprint Quality Indicator from 2020 – not HQM 4 stars per say. Given eth above we would suggest that policy EN2 is being overly ambitious in its aspirations. Other authorities such as Colchester and Mid Beds have merely looked to support developers who choose to register their homes under the HQM.

EN4 – Energy reduction in new buildings

7.7 The Written Ministerial Statement (WMS) published in March 2015 stated the Government's intention to introduce improved energy efficiency requirements through Building Regulations. It went on to state that Council's should not seek to apply standards higher than those set out in building regulations other than the published optional technical standards. Some interim flexibility was provided allowing Councils to seek improvements in energy efficiency through local plans that were the equivalent of level 4 of the Code for Sustainable Homes until new regulations had been introduced.

7.8 However, following the publication of the WMS the Government did not take forward the legislation as indicated leaving the interim guidance in place which allows for a maximum improvement of 20% in relation to part L of the building regulations. The situation has now been clarified further within 6-012 PPG reiterating the Government's position as set out in the WMS. However, the Council's policy as set out in EN4 would result in some developments having to deliver energy efficiency improvements of greater than 20%. As such we would suggest that part 2 of EN4 is amended to require total reduction of 20% using a combination of fabric first and renewables.

7.9 The Council will also need to monitor progress with regard to the Future Homes Standards which will see the improvements being suggested by the Council being brought int building regulations and as such make policies such as EN4 unnecessary.

7.10 We would also suggest that paragraphs 3 to 6 are removed from the policy and placed in the supporting text as they are guidance and not required in relation to the determination of a planning application.

EN11 – Net Gains for Nature: Biodiversity

7.11 The Council's proposals with regard to Biodiversity Net Gains will need to have regard to the proposals being considered by Government as set out in the Environment Bill. The Council will need to ensure their policies are consistent with the approach being promoted by Government and that their impact on viability is properly considered by the Council.

EN29 – Sustainable Drainage

7.12 We would expect a development to deliver a net reduction in runoff but it would seem that the Council are expecting, in some cases, significant improvements which may see developments having to reduce runoff to rates below those on green fields. This would appear to be inconsistent with current guidance produced by Defra on this matter which suggests that a brownfield development must be as close as practicable to greenfield runoff rates. This recognises that in some situations a development will not be able to deliver greenfield runoff rates and that in such a situation it should seek an improvement over the existing runoff rates on any previously developed site. Given the Government's focus on delivering more development on brownfield sites we would suggest it is essential that greater flexibility is provided in this policy. We would suggest that the policy is amended to require an applicant to show a net reduction that is as close as practicable to greenfield runoff rates.

H1 – Implementation of Planning Permission for New Residential Dwellings

7.13 We note that Policy H1 requires that:

'Unless there are exceptional circumstances due to specific site or development constraints, a condition will be attached to any grant of planning permission for new major residential development (including change of use) requiring one or the other of the following conditions:

- That the permission be implemented within two years from the date of decision; or*
- That groundworks and the construction of the ground floor base of at least two buildings be completed within three years of the permission'*

7.14 In our opinion policy H1 requires some clarity. The term implemented is not defined in the policy, reasoned justification or glossary. Does it mean completed or merely started. Is the definition of started the carrying out of a material operation as defined in section 56(4) of the 1990 Act or something more advanced? What is an 'exceptional circumstances'? Why can't the policy be 'unless otherwise agreed'? Whilst we fully

support the desire to see planning consents implemented promptly, we do not believe that para 76 of the NPPF looks to see this enshrined in planning policy – rather this is a matter for LPA's to look to address through the imposition of suitable worded conditions. We would thus question whether policy H1 complies with national policy.

H4 – Housing Density

7.15 The proposed policy is inconsistent with the wording of national policy which seeks to ensure appropriate densities rather than providing an appropriately high-density development. The final sentence is redundant as it is self-evident that a planning application that does not meet a policy requirement will be refused permission. We would suggest the following amendment:

~~“Development shall be delivered~~ should ensure appropriate densities that make the most effective use of land ~~to an appropriately high density~~ with regard to its context, including landscape, topography, surrounding built form and any other relevant factors

~~Planning application will be refused where development is found not to make efficient use of land”~~

H5 – Affordable housing

Viability assessment

7.16 The latest Framework places far more emphasis on the local plan with regard to viability and ensuring that development will be deliverable against the policy requirements being set by the Local Planning Authority. It is therefore essential that the approach taken by Councils is consistent with both policy and guidance and that the Council does not seek to secure contributions at a level that could make development viability marginal and which will, inevitably, lead to site by site negotiations with regard to affordable housing and other contributions. To assist Council's in the consideration of viability issues within their local plans the HBF has worked with its membership to prepare a short note on how viability is considered by the housebuilding industry, attached to this response, and how they consider build costs, fees, profit etc. Using this guide, we have also reviewed the Viability Assessment and have the following recommendations with regard to the approach and the costs it applies:

- Fees. We would recommend using the highest figure in the ranges suggested on page 43. It is important that a cautious approach is taken with regard to fees. In particular professional fees on larger and more complex sites can be up to 20% of build costs.

- Developer profit. The Council proposes 15 to 20% on GDV for market housing and 6% on affordable. However, PPG advises that profit should be 15% to 20% on total GDV for a development. A 15% margin on market housing and 6% margin on affordable housing will result in a profit margin on development GDV of less than 15%.
- Abnormals. Whilst the assessment suggests that any abnormal costs will be removed from the land value there is the risk that if these are significantly higher than the land value will not be sufficient to incentivise the sale of that land. As we set out in our viability guide there are a huge range of abnormal costs to be accounted for and the Council should engage with housebuilders in Tunbridge Wells to consider the amount of abnormal costs, they have faced in bringing sites forward. Evidence submitted by the HBF to the County Durham Local Plan showed that evidence from 14 sites the average level of abnormal costs for a Greenfield site was £495,000 per hectare and £711,000 per hectare for brownfield sites. Whilst we appreciate that these costs will vary between areas it provides an indication that these costs can be substantial and should be considered in more detail.
- Other policy costs. The Assessment appears to have considered the impact of its policies for affordable housing and accessibility standards. However, we could not find any consideration of the higher energy standards in EN4 and the requirement to achieve a net gain in biodiversity as set out in EN11. In particular achieving biodiversity net gain could have a significant impact on development. The Government's Impact Assessment on its proposals for biodiversity net gain published alongside its response to the consultation indicates that it will cost an average of around £20,000 per hectare to achieve a 10% net gain in biodiversity through a 75:25 split between onsite mitigation and offsite contributions. However, the study also recognises that should higher levels of off-site contribution be required the costs will increase substantially.

H9 – Housing for older people

7.17 Whilst we welcome the recognition of the need to ensure a supply of accommodation for older people, we consider it necessary to identify within the plan sites that will meet the specialist needs of older people. In particular it will be important to identify C3 retirement accommodation to increase the choice for older people that will potentially free up larger family homes within the Borough.

Contributions from older persons housing

7.18 This policy will require affordable housing to be provided on-site and as such provides insufficient flexibility. Such affordable housing provision has proven to be incompatible with managed sheltered housing developments. This matter has been accepted in many areas and tested at length at appeals. RSL's have

also been found to be unwilling to take on any such units. The effect of this Policy would stifle delivery of sheltered housing accommodation. Such an approach conflicts with the positive approach towards housing delivery contained within the NPPF and as such is unsound. We would suggest that accommodation for older people not be required to provide onsite provision for affordable housing and instead be required to provide a commuted sum in lieu of provision.

H11 – Self-Build and Custom Housebuilding

7.19 Whilst we support the encouragement of self-build housing through the local plan, we do not consider the requirement for sites of over 100 to provide at least 5% service plots for self and custom house building to be justified or consistent with national policy. Whilst we recognise that Local Planning Authorities now have a duty to promote self-build housing, we do not consider the Council to have looked at sufficient options with regard to how it can provide plots to support self-builders. Paragraph 57-024 of the PPG sets out a variety of approaches that need to be considered – including the use of their own land. This is reiterated in para 57-14 of the PPG which sets out the need for Council's to consider how they can support the delivery of self-build plots through their housing strategy, land disposal and regeneration functions. The Council must investigate other means by which to promote self-build custom house-building opportunities, including the use of its own land, it has not been able to bring this forward in the Local Plan. We would suggest that it should conclude these investigations before requiring the provision of service plots on larger sites.

7.20 Finally, the Council will also need to carefully consider their evidence to ensure that it is sufficiently robust to support the proposed requirement. Paragraph 67-003 of PPG requires Council's to review their registers to ensure that there is those who are on the list are still interested and that there is no double counting with other registers. Where lists have been reviewed elsewhere the number of self-build plots to be planned for have dropped significantly. In Runnymede for example more stringent registration requirements were applied in line with national policy and saw the numbers of interested parties on the register fall from 155 to just 3.

8.0 CONCLUSION

- 8.1 These representations have been prepared in respect of Land to the East of Horsmonden (hereafter referred to as 'the Site') which has received a draft allocation, under Policy Reference AL/HO3.
- 8.2 This land is controlled by Persimmon Homes who are also the owners of the adjacent committed development Site known as Bassetts Fam.
- 8.3 It is the intention of Persimmon Homes to jointly deliver these Land East of Horsmonden and Bassett Farm to create a new high quality, sustainable neighbourhood of Horsmonden.
- 8.4 Supported by a detailed site specific evidence base these representations have demonstrated that the Site is located in a sustainable location, is suitable, available and achievable, and deliverable in the Plan period.
- 8.5 It is thereby considered that the development of the Site would deliver sustainable development in respect of all three sustainability objectives:

- Economic

From an economic perspective, the development of the site will contribute towards building a strong, responsive and competitive economy within Horsmonden. The delivery of high-quality housing on the site will contribute to ensuring a number of benefits including: additional Council Tax revenues and direct and indirect/induced job creation. Benefits from the construction of the site include the creation of jobs for the local economy where possible and the use of local construction firms and suppliers. Additional residents will also generate more spending power in the local area to enhance the vitality of local services.

- Social

From a social perspective, the development of the site will support the creation of a strong, vibrant and healthy community by increasing the supply of housing in Horsmonden. The proposed development will comprise a high-quality built environment and will been designed to meet the needs of the area and complement the character of the surroundings. The development of the site provides the opportunities to deliver a number of benefits comprising public open space and recreation space, including play areas for children. The new homes will meet local affordable needs, as well as attract and welcome new families to the area.

- Environmental

From an environmental perspective, the development will deliver a number of benefits including: provision of new green infrastructure including green corridors and open space which can provide ecological gain; and, a design which is informed by the existing landscape and incorporates and protects existing features such as the existing hedges and woodland. No environmental constraints have been identified that would inhibit the development of the site.

8.6 However to ensure that these sustainability objectives are realised it is important that the comments and recommendation concerning the plan development strategy and evidence base are carefully revised and acted upon, to ensure that the Plan is sound going forward.

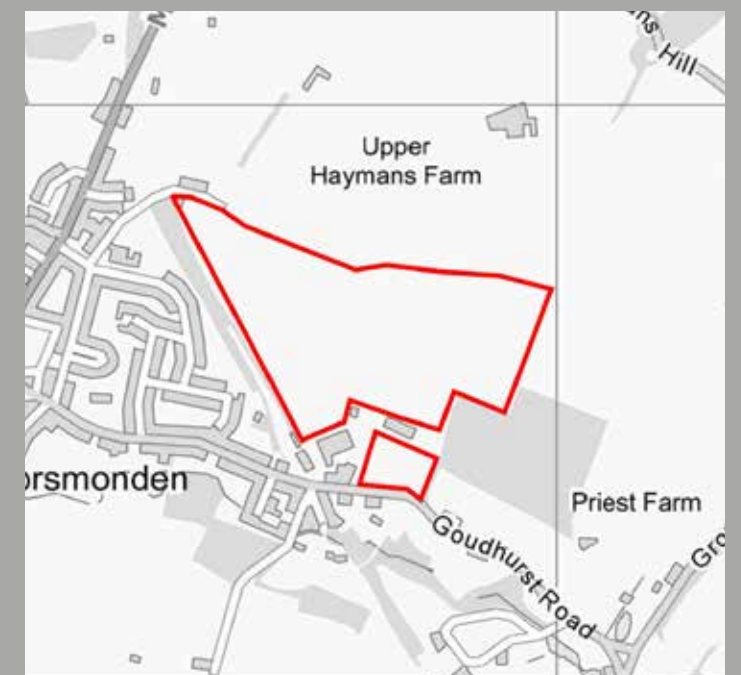
8.7 In addition it is important that the amendments to Policy AL/HO3 outlined in Section 6 are incorporated into the Reg.19 Plan to ensure that the allocation is deliverable.

8.8 Most notably it is critical that clarity is provided concerning the safeguarded community land, to ensure that the delivery of this infrastructure does not delay the realisation of much needed housing on the Site.

APPENDIX 1 – LANDSCAPE APPRAISAL

Land to the east of Horsmonden, Kent
**LANDSCAPE STATEMENT TO SUPPORT REPRESENTATIONS TO
THE TUNBRIDGE WELLS BOROUGH EMERGING LOCAL PLAN**

on behalf of **Persimmon Homes**
October 2019



B	FINAL	LF	JBA	JBA	November 2019
A	FINAL	LF	JBA	JBA	October 2019
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Revision	Purpose	Originated	Checked	Authorised	Date
Document Number: JBA 19/271 - Doc1		Document Reference: LANDSCAPE STATEMENT Land east of Horsmonden, Kent JAMES BLAKE A S S O C I A T E S			

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1. INTRODUCTION

1.1 Background

- 1.1.1 This Landscape Statement has been prepared by James Blake Associates Ltd, Chartered Landscape Architects, on behalf of Persimmon Homes to support representations to the Tunbridge Wells Borough Local Plan Consultation (Regulation 18).
- 1.1.2 This statement has been produced in regards to an area of land to the east of Horsmonden, Kent ('the Site'). This Site is being promoted for future development, and this statement explores how development could be accommodated on Site with minimal landscape and visual impacts.
- 1.1.3 Horsmonden is a village located in the Weald of Kent. The nearest towns are Tunbridge Wells, 13km to the west, Maidstone, 20km to the north and Cranbrook, 13km to the east. Horsmonden lies within the jurisdiction of Tunbridge Wells Borough Council. The local landscape is one of gently undulating agricultural land, mostly grade two/three, most often in use as commercial orchards and interspersed with small areas of woodland.

1.2 Site Location and Study Area

- 1.2.1 The location and boundaries of the Site are shown in **Figure 1**. The area (approximately 14.7ha) is located adjacent to the existing settlement edge of Horsmonden and to the immediate north and east of a consented development site for up to 30 no. residential dwellings. The Site comprises two distinct areas - the orchard area to the north and a paddock area to the south-east.
- 1.2.2 The associated study area extends approximately 1km in all directions.

1.3 Methodology and Approach

- 1.3.1 This statement follows the principles of baseline assessment as set out in GLVIA3¹, and focuses on establishing the information relevant to the potential future development of the Site. In line with the current guidance, the landscape resource and views are appraised separately.
- 1.3.2 The report assesses the potential landscape and visual constraints and opportunities of the Site and its context, namely:
 - The landscape as a resource – by identifying important elements and features within and adjacent to the Site; appraising landscape character and its key characteristics; and considering the value attached to the landscape as a whole;
 - Views and visual amenity – by identifying the extent of the visibility of the site; representative views as experienced by local residents and visitors to the area; and the existing nature of these views; and
 - Green Infrastructure – by exploring opportunities for the creation of open space as part of a wider strategic network.
- 1.3.3 The information was used to inform and develop a landscape-led strategy for residential development with associated green infrastructure and open space. It is envisaged that this strategy will provide an overarching vision and

1 ¹Guidelines for Landscape and Visual Impact Assessment - 3rd Edition (GLVIA3). Landscape Institute and IEMA. 2013

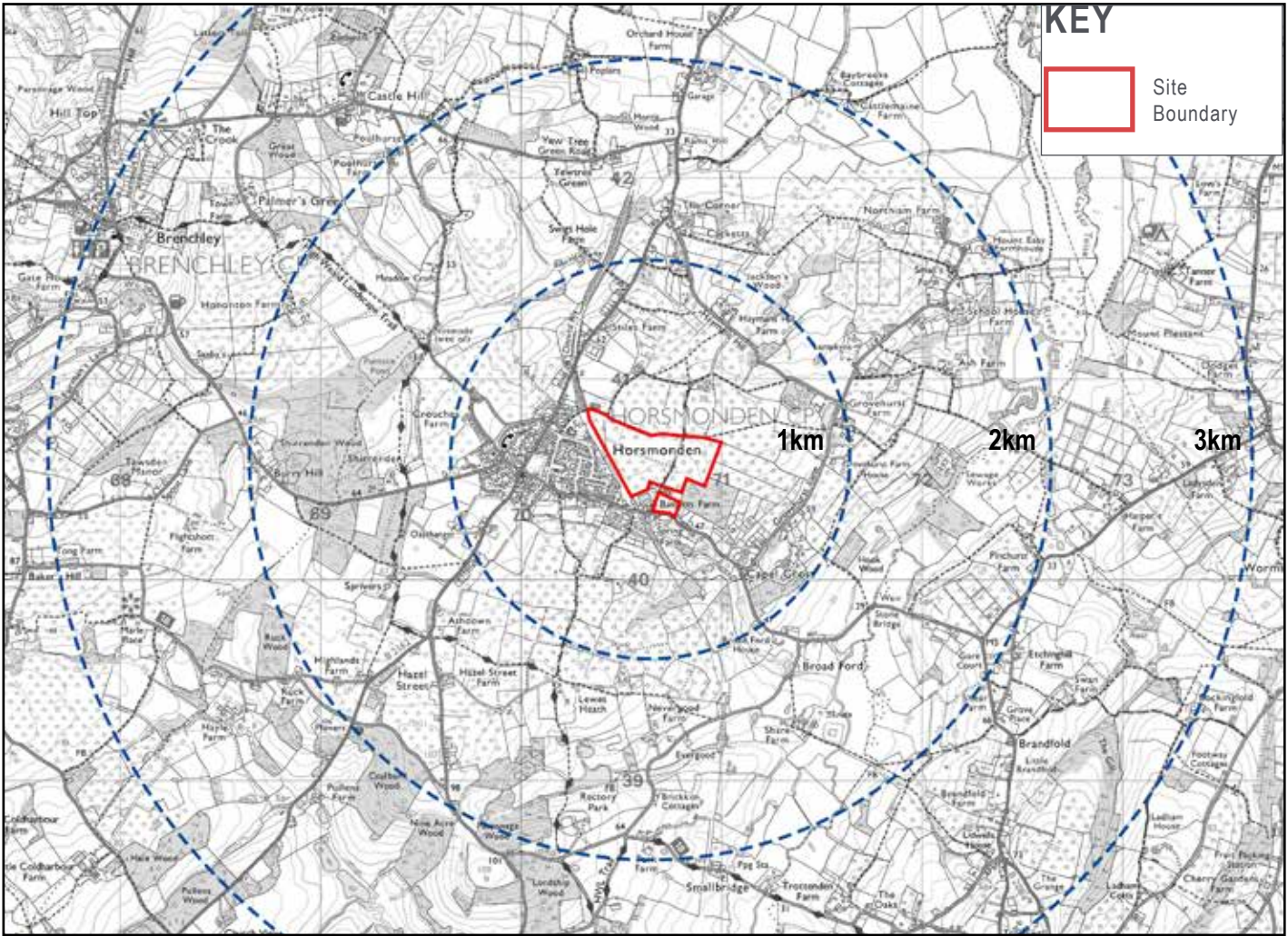


Figure 1: Site Location and Study Area.
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- establish design principles for future development that minimise potential landscape and visual effects.
- 1.3.4 This assessment was informed by a desk study of current planning policy, designations, landscape character (including published landscape character assessments) and green infrastructure strategies as well as aerial/OS mapping. The desk study was supported by field survey, with a site visit undertaken on the 3rd of October 2019. Photographs taken in late summer represent the best case scenario in terms of visual screening; visibility will be higher in winter when deciduous vegetation is not in leaf.

2. POLICY CONTEXT

2.1 Planning Policy Framework

2.1.1 The following section outlines the general planning policies as relevant to landscape and the built environment.

National

2.1.2 The NPPF sets out the Government’s planning policies for England and how these are expected to be applied. The NPPF sets out a clear presumption in favour of sustainable development, which should be seen as a ‘golden thread’ running through plan-making and decision-taking. There are three dimensions to sustainable development: economic, social and environmental.

2.1.3 NPPF Section 7: Requiring Good Design sets out that good quality and inclusive design is a key aspect of sustainable development. As such all new developments should ‘function well and add to the overall quality of the area...,’ ‘establish a strong sense of place...,’ ‘optimise the potential of the site to accommodate development, creating and sustaining an appropriate mix of uses (including green and other public space);’ ‘respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;’ and ‘be visually attractive as a result of good architecture and landscaping’. These principles are supported by NNPG 26: Design.

2.1.4 NPPF Section 11: Conserving and Enhancing the Natural Environment sets out that the planning system should contribute to and enhance the environment by protecting and enhancing valued landscapes. This includes designated landscapes but also the wider countryside. In this respect Local planning authorities should ‘set criteria based policies against which development on or affecting protected.... landscape areas will be judged.’ Distinctions should be made between ‘the hierarchy of international, national and locally designated sites, so that the protection is commensurate with their status...’. The highest level of protection should be given to areas of National importance (National Parks and Areas of Outstanding Natural Beauty). These principles are supported by NNPG 8: Natural Environment including landscape, biodiversity and green infrastructure.

2.1.5 NPPF Section 12: Conserving and Enhancing the Historic Environment places emphasis on the conservation and enjoyment of the historic environment, recognising that ‘heritage assets are an irreplaceable resource’ and seeking to ‘conserve them in a manner appropriate to their significance’. These principles are supported by NPPG 18a: Conserving and Enhancing the Historic Environment.

Borough

2.1.6 The current Development Plan for the Borough comprises the saved Local Plan (2006) policies, the Core Strategy (2010) and the Site Allocations Local Plan (2016) and these should be read in conjunction with each other.

Tunbridge Wells Borough Local Plan (2006)

2.1.7 The Local Plan provides local planning policies to provide for both change and conservation in the Borough.

2.1.8 However, 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.

2.1.9 The only policy considered to be of relevance to the proposed development is Policy EN 22 - Areas of Landscape Importance. This policy states:

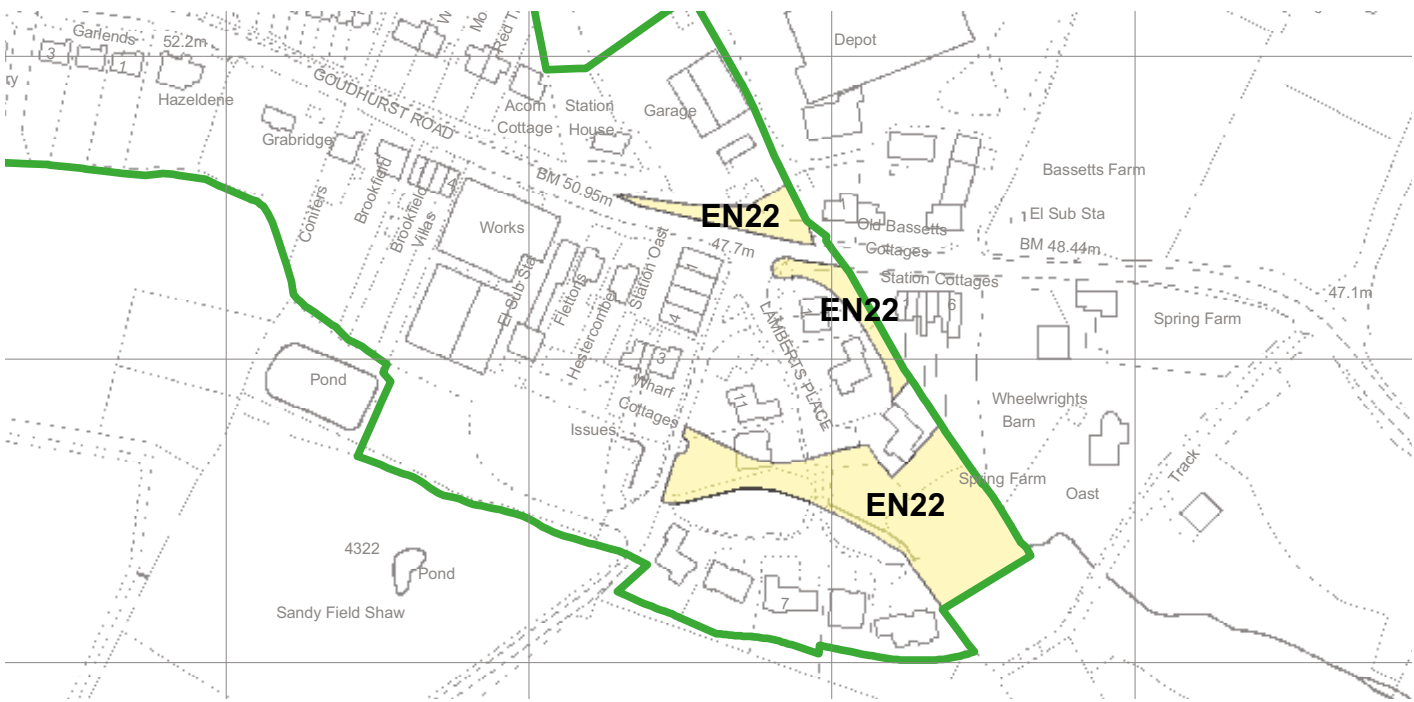


Plate 1: Location of Areas of Landscape Value

Source: Tunbridge Wells Local Plan (2006)

‘Proposals for development affecting Areas of Landscape Importance, as defined on the Proposals Map, will only be permitted where no significant harm would be caused to the appearance or landscape character of the designated area and the development would not materially detract from the contribution which that area makes to the locality’.

2.1.10 A small area of verge to the south of Station Garage (part of the wider allocation area) is defined as an Area of Landscape Importance (refer to Plate 1).

Tunbridge Wells Borough Core Strategy (2010)

2.1.11 The Core Strategy Development Plan Document sets out the amount of development required across the Borough to 2026 and divides this amount between settlements.

2.1.12 Of most relevance to the proposed development is Core Policy 4 - Environment, this states:

‘The Borough’s built and natural environments are rich in heritage assets, landscape value and biodiversity, which combine to create a unique and distinctive local character much prized by residents and visitors alike. This locally distinctive sense of place and character will be conserved and enhanced as follows:

- The Borough’s urban and rural landscapes, including the designated High Weald Area of Outstanding Natural Beauty, will be conserved and enhanced
- The Borough Landscape Character Area Assessment 2002 will be utilised to manage, conserve and enhance the landscape as a whole
- A hierarchical approach to nature conservation and the protection of biodiversity and geodiversity will be applied

2. POLICY CONTEXT Continued.

across the sites and habitats of national, regional and local importance within the Borough. The objective will be to avoid net loss of biodiversity and geodiversity across the Borough as a whole

- Opportunities and locations for biodiversity enhancements will be identified and pursued by the creation, protection, enhancement, extension and management of green corridors and through the development of green infrastructure networks in urban and rural areas to improve connectivity between habitats*
- The Borough’s heritage assets, including Listed Buildings, Conservation Areas, Scheduled Ancient Monuments, archaeological sites and Historic Parks and Gardens will be conserved and enhanced and special regard will be had to their settings*
- The positive management of heritage assets through partnership approaches and measures will be encouraged, including by the use of Conservation Area Management Plans’.*

Tunbridge Wells Borough Site Allocations Local Plan (2016)

- 2.1.13 The main purpose of this Site Allocations document is to allocate land for housing, employment, retail and other land uses to meet the identified needs of the communities within Tunbridge Wells borough to 2026 and beyond.
- 2.1.14 None of the policies contained within the Site Allocations Local Plan are considered relevant to the proposed development.
- Tunbridge Wells Borough Emerging Local Plan
- 2.1.15 Tunbridge Wells Borough Council are currently in the process of creating a new Joint Local Plan which is currently at the Regulation 18 consultation stage.
- 2.1.16 Policies of relevance to the Proposed Development include:
- Policy STR 8 - Conserving and enhancing the natural, built, and historic environment
 - Policy AL/HO 3 - Land to the east of Horsmonden
- 2.1.17 Further commentary in relation to emerging policies is provided within the Written Representations prepared by Persimmon Homes.
- 2.1.18 Further commentary in relation to the Landscape Strategy for Parcel HO 3 is provided in **Section 6.0**.

Landscape and Nature Conservation Supplementary Planning Document (2002)

- 2.1.19 *‘The principal resource of Tunbridge Wells Borough is the high environmental quality of its countryside, towns and villages. Around 70% of the Borough is designated as part of the High Weald Area of Outstanding Natural Beauty and within the Borough there are more than a hundred sites designated for their importance to wildlife. Through national and international law and Government guidance Tunbridge Wells Borough Council as the Local Planning Authority is charged with protecting and enhancing the landscape and wildlife across the Borough’.*
- 2.1.20 The Landscape and Nature Conservation Guidelines have therefore been drawn up to assist applicants in preparing schemes that take full account of landscape and nature conservation issues and submit proposals that achieve the ‘best fit’ environmentally for their site.
- 2.1.21 These guidelines have been fully considered within the Landscape Strategy Plan produced for the Site.

Green Infrastructure Plan Supplementary Planning Document (2014)

- 2.1.22 The Green Infrastructure (GI) Plan has formed a key part of the evidence base for supporting allocated sites and other policies within the Site Allocations DPD and has been developed alongside that document with significant stakeholder and community involvement. The document outlines policies existing GI assets in the Borough and provides recommendations as to how GI can be incorporated into future development.
- 2.1.23 Horsmonden lies within an area where High Weald - Low Weald links should be improved and is subject to Proposal 6: High Weald Transition Zone - strengthening National Character Area Protect, enhance and restore the landscape character of the High Weald National Character Area outside of the High Weald Area of Outstanding Natural Beauty.
- 2.1.24 It is acknowledged that there is a strong historical relationship between the High Weald and Low Weald landscapes, based on the exploitation of the natural resources of the High Weald for pannage, timber, iron and charcoal that has resulted in a north-south pattern of historical routeways, including Roman roads, ironways and drove roads. Some of these historical routeways have become busy roads, but many are narrow rural lanes, footpaths and bridleways that are also important for their visual amenity and wildlife. Protecting and enhancing these routeways so that their heritage, amenity and wildlife value are secured can be done in tandem with improving access, to encourage people to explore these landscapes. Improving links between the High and Low Weald may encourage people to explore new areas, taking visitor pressure off some High Weald landscapes, and may also reduce the need to travel to more accessible places. This proposal would also complement Proposal 6: The High Weald Transition Zone.

Paddock Wood to Hawkhurst Branch Line, Tunbridge Wells, Kent: Historic Environment Assessment

- 2.1.25 The wider site allocation incorporates part of the former railway line linking Paddock Wood to Hawkhurst. The Historic Environment Assessment notes that *‘between Horsmonden and the former Goudhurst Station, the line is very well preserved. The alignment is visible, with trees marking the route and surviving embankments’*. There is no public access to the dismantled railway line adjacent to the western site boundary.

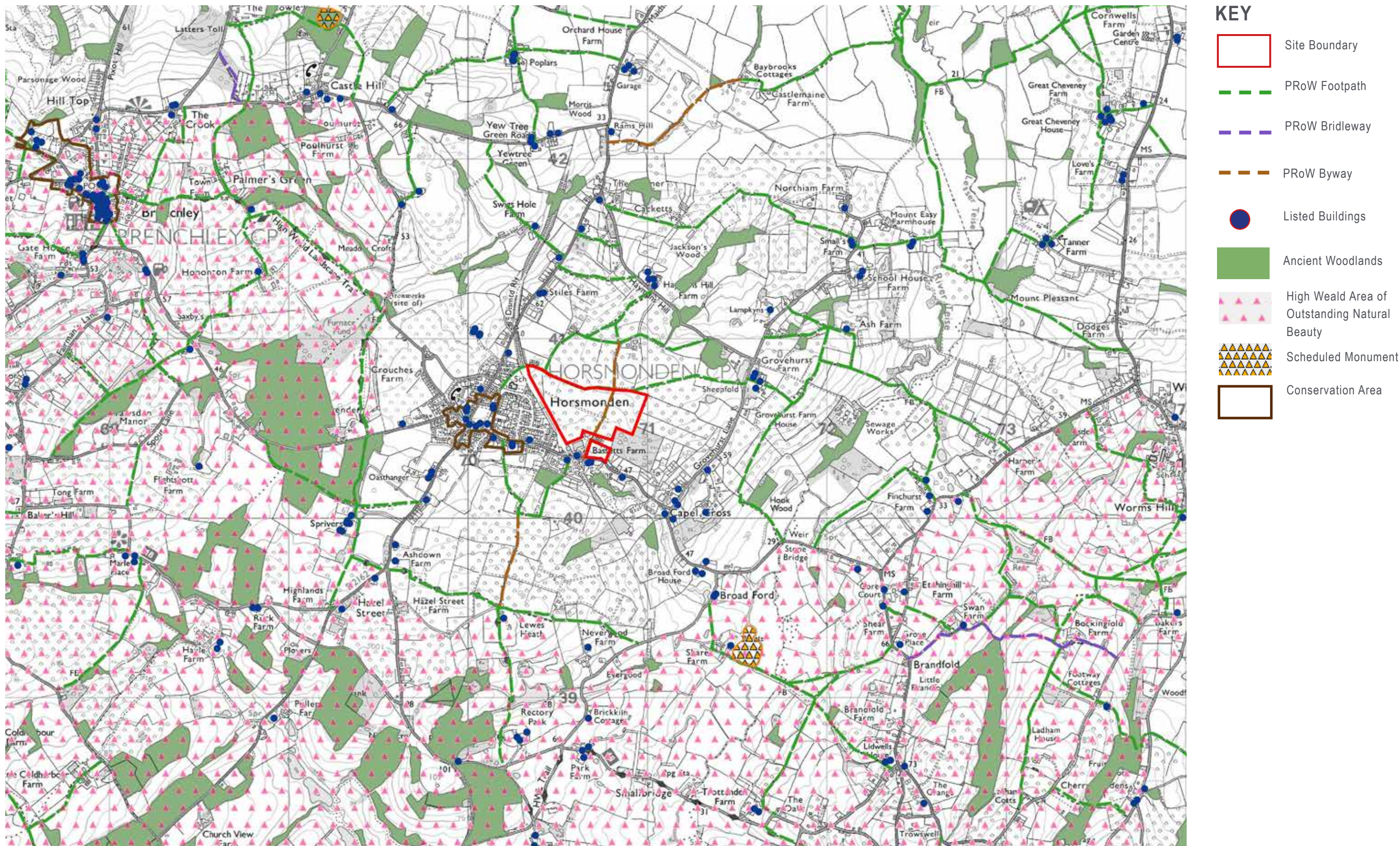


Figure 2: Designations Map. Scale 1:20 000 @ A3.

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3. LANDSCAPE ANALYSIS

3.1 Landscape Character

- 3.1.1 In accordance with National and Local guidance, this section considers the existing landscape character of the site and its environs.
- 3.1.2 The character of the landscape evolves over time as a result of the interaction of human activity and the natural environment (people and place). Factors used to assess landscape character include:

- Physical – geology, land-form, climate, soils, fauna and flora;
- Cultural and Social – land-use, settlement, enclosure & history;
- Aesthetics – colour, texture, pattern, form and perception.

- 3.1.3 It should be noted that landscape is a continuum and character does not generally change abruptly on the ground. More commonly, the character of the landscape will change gradually and therefore the boundaries between both Landscape Character Types (LCTs) and Landscape Character Areas (LCAs) should be considered to reflect zones of transition.

National

- 3.1.4 At the national level (Natural England, 2012) the study area lies within the High Weald National Character Area (NCA 122).
- 3.1.5 The High Weald National Character Area (NCA) encompasses the ridged and faulted sandstone core of the Kent and Sussex Weald. It is an area of ancient countryside and is said to be one of the best surviving medieval landscapes in northern Europe. The High Weald Area of Outstanding Natural Beauty (AONB) covers 78% of the NCA. The High Weald consists of a mixture of fields, small woodlands and farmsteads connected by historic routeways, tracks and paths. Wild flower meadows are now rare but prominent medieval patterns of small pasture fields enclosed by thick hedgerows and shaws (narrow woodlands) remain fundamental to the character of the landscape.
- 3.1.6 Key characteristics of the High Weald National Character Area (NCA 122) include:
- *A faulted landform of clays, sand and soft sandstones with outcrops of fissured sandrock and ridges running east–west, deeply incised and intersected with numerous gill streams forming the headwaters of a number of the major rivers – the Rother, Brede, Ouse and Medway – which flow in broad valleys.*
 - *High density of extraction pits, quarries and ponds, in part a consequence of diverse geology and highly variable soils over short distances.*
 - *A dispersed settlement pattern of hamlets and scattered farmsteads and medieval ridgetop villages founded on trade and non-agricultural rural industries, with a dominance of timber- framed buildings with steep roofs often hipped or half-hipped, and an extremely high survival rate of farm buildings dating from the 17th century or earlier.*
 - *Ancient routeways in the form of ridgetop roads and a dense system of radiating droveways, often narrow, deeply sunken and edged with trees and wild flower-rich verges and boundary banks. Church towers and spires on the ridges are an important local landmark. There is a dense network of small, narrow and winding lanes, often sunken and enclosed by high hedgerows or woodland strips. The area includes several large towns such as Tunbridge Wells, Crowborough, Battle and Heathfield and is closely bordered by others such as Crawley, East Grinstead,*

Hastings and Horsham.

- *An intimate, hidden and small-scale landscape with glimpses of farreaching 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. A predominantly grassland agricultural landscape grazed mainly with sheep and some cattle.*
- *There is a strong influence of the Wealden iron industry which started in Roman times, until coke fuel replaced wood and charcoal. There are features such as a notably high number of small hammer ponds surviving today.*
- *Ashdown Forest, in contrast to the more intimate green woods and pastures elsewhere, is a high, rolling and open heathland lying on the sandstone ridges to the west of the area.*
- *An essentially medieval landscape reflected in the patterns of settlement, fields and woodland.*
- *High-quality vernacular architecture with distinct local variation using local materials. Horsham Slate is used on mainly timber structures and timber-framed barns are a particularly notable Wealden characteristic feature of the High Weald’.*

County: Kent’s Landscape Assessment

- 3.1.7 The Landscape Assessment of Kent was undertaken for Kent County Council, by Jacobs Babbie in 2004. The Site and its immediate area comprises the Kent Fruit Belt: Kentish High Weald Landscape Character Type (LCT). The Kent Fruit Belt is described as an ‘*intimate, densely settled area, small lanes twist through a seemingly endless maze of high hedges and tidy orchards*’. Oasthouses and packing sheds serve as a reminder that this has always been, and remains, a working landscape.
- 3.1.8 The Kent Fruit Belt is part of the larger character area of the Kentish High Weald. Kent is known as the Garden of England and the Kentish High Weald plays an important part in this tradition. This is a richly textured landscape, where the angular patterns of the orchard and hop garden contrast with smooth sweeps of arable or intensively grazed pasture. Despite a continuing decline in fruit cultivation, this area still owes its gardenesque feel to the abundant orchards and hop gardens.
- 3.1.9 Key Characteristics of the Kent Fruit Belt: Kentish High Weald LCT include:
- *‘Small-scale intimate enclosed valleys and ridges.*

3. LANDSCAPE ANALYSIS Continued.

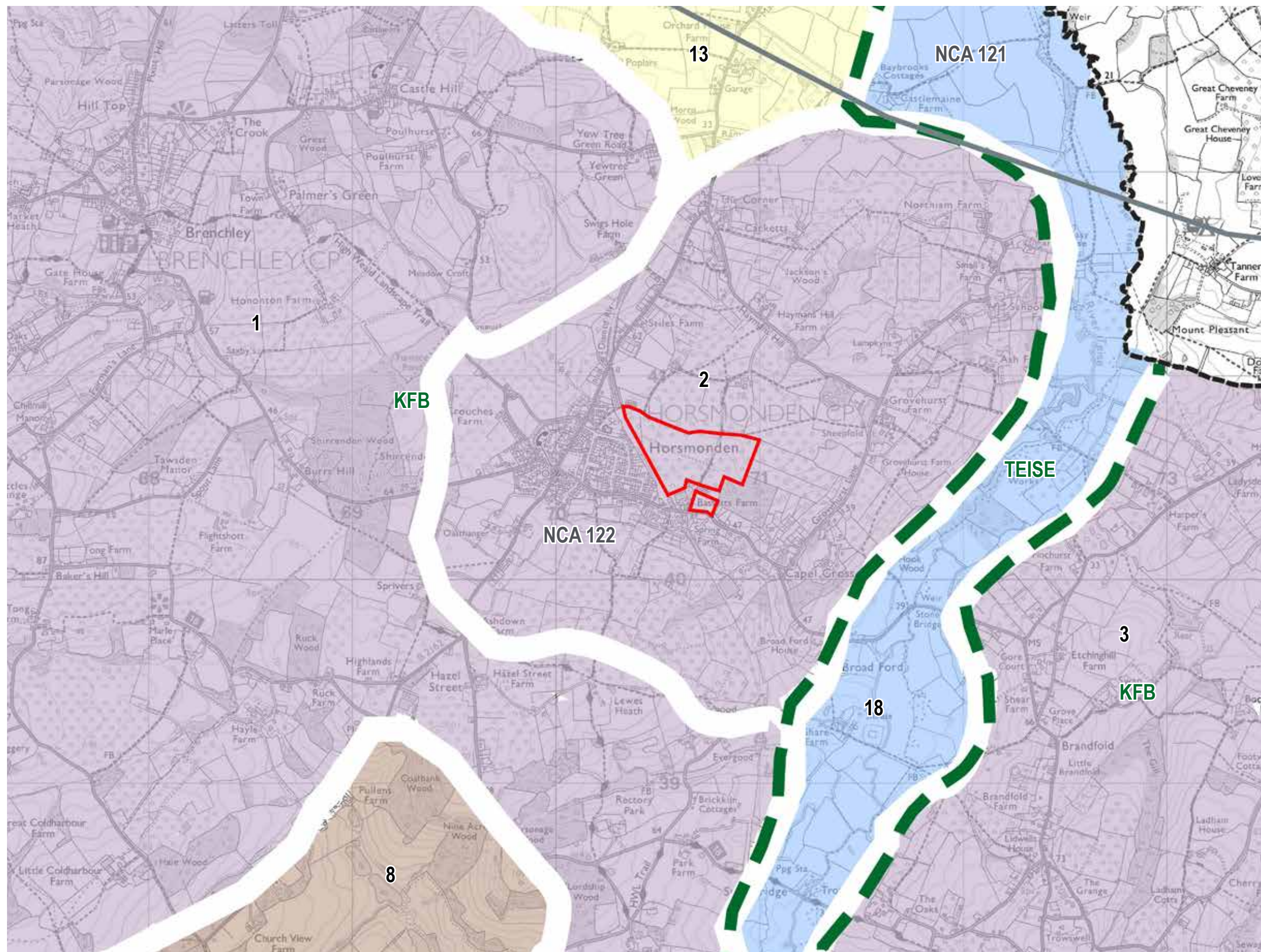
- *Small scale orchards and high hedges. Some hops.*
 - *Mixed woodland, intensive cultivation. Small lanes, many small villages and dense settlements’.*
- 3.1.10 Overall this LCA is considered to be in good condition with built development having a strong vernacular appeal and a coherent pattern of elements within the landscape. The sensitivity is considered to be moderate, the small-scale and variety of rural land use is characteristic along with scattered small-scale built development; however in some areas, the characteristic scale has been lost due to the decline in field boundaries and loss of woodland.
- District: Tunbridge Wells Borough Landscape Character Assessment**
- 3.1.11 The district level assessment (Tunbridge Wells Borough Landscape Character Assessment), provides the best level of detail for this assessment. The Site and its immediate area comprise the Horsmonden Fruit Belt Landscape Character Area (LCA 2).
- 3.1.12 *‘The raised sandstone plateau is almost entirely covered by fruit plantations and the area is distinguished by the virtual absence of ghyll woodlands, with only very small isolated woodland copses surviving within the very intensively cultivated landscape. Horsmonden village is the main focus of settlement’.*
- 3.1.13 Key Characteristics of the Horsmonden Fruit Belt include:
- *‘A raised sandstone plateau forming a series of undulating ridges on the edge of the High Weald ‘upland’.*
 - *Occasional long views out over the patchwork farmland of the Low Weald to the wooded ridge of the North Downs.*
 - *A predominantly open landscape with only occasional small woodland copses creating a much more open, agricultural character than in the rest of the High Weald, with a reduced sense of enclosure.*
 - *Some enclosure provided by the alder and poplar shelter hedges around the fruit fields and hedgerow lines along roads, and around ponds.*
 - *An intensively cultivated landscape dominated by orchards but also occasional areas of hops and some soft fruit.*
 - *Many dispersed, scattered rural buildings with the principal settlement and focus of the area being the village of Horsmonden’.*
- 3.1.14 Although not within the High Weald Area of Outstanding Natural Beauty, for many people travelling through the area it is perceived as such. As highlighted within the Landscape Character Assessment, *‘there are strong associations between this area and the AONB and the area enhances the character of the AONB landscape’.* The following key qualities related to the AONB are particularly valued in this character area:
- *‘Frequent glimpsed views to the wooded ridgelines of the High Weald to the east, south and west, for example from the crests of hills in and around Horsmonden. Physically the area forms an ‘edge’ to the High Weald upland. From the higher ground, such as at Hayman’s Hill, there are also extensive views out over the patchwork Low Weald farmland, terminating at the wooded ridge of the North Downs in the distance.*
 - *Frequent historic farmsteads are conspicuous features in the landscape – both isolated and associated with roads and tracks. These add local vernacular character typical of the High Weald, including oast houses, timber-framed farm buildings and details such as traditional weatherboarding, clay tiles and hipped roofs.*

- *Locally distinctive features so characteristic of the AONB are consistently represented throughout the area, including orchards, a few remaining hop gardens and ponds, pits and relics of the iron industry’.*
- 3.1.15 Other features and qualities considered to be of particular landscape and visual value to the character area include:
- *‘The scenic quality and interest of the undulating landscape of orchards where intersecting regular lines created by the rows of fruit create a patterned and textured landscape. Traditional orchards which are managed in a low intensity way provide habitat mosaics along with a network of hedgerows, mature oak trees, wide grass verges and occasional woodlands.*
 - *Areas which retain a sense of the historic landscape, where the irregular and sinuous boundaries of ancient woodlands have been carved out to form fields with wavy boundaries surrounded by hedgerows, and with ponds, which are likely the result of ‘marling’ pits being dug.*
 - *The village of Horsmonden, particularly the focus at the village green which is enriched by the presence of locally distinctive and vernacular buildings as well as the isolated church overlooking the Teise valley which was part of a medieval hamlet.*
 - *The old Hawkhurst Branch Railway Line which cuts through the area and provides a local ecological and potential recreational resource, as well as serving as a reminder of the culture of ‘the hop-pickers line’ and local hop industry in the area.*
 - *The harmonious balance of landscape features where a strong rural character prevails, and features such as ancient woodland, hedges, mature trees, grass verges, ponds combine with historic buildings, creating an interesting, varied and calm landscape.*
 - *Dark skies away from the main settlement of Horsmonden, particularly in the area north of Haymans Hill, indicate a sense of rural calm’.*

3.2 Landscape Management Guidelines

National: NCA Statements of Environmental Opportunity

- 3.2.1 Statements of Environmental Opportunity for the High Weald National Character Area (NCA 122) of relevance to the proposal include:
- *‘SEO1: Maintain and enhance the existing woodland and pasture components of the landscape, including the historic field pattern bounded by shaws, hedgerows and farm woods, to improve ecological function at a landscape scale for the benefit of biodiversity, soils and water, sense of place and climate regulation, safeguard ancient woodlands and encourage sustainably produced timber to support local markets and contribute to biomass production. For example by:*
 - *Maintaining and restoring links between woodland and other woodland habitats (such as hedgerows, traditional orchards and parkland) and species-rich grasslands and heathland outside the main woodland. This will create a robust network of wooded and open semi-natural habitats that will benefit the internationally important populations of bats, as well as other species.*



KEY

- Site Boundary
- District/Borough Boundary
- National: National Character Areas
 - National Character Area Boundary
 - NCA 121** Low Weald
 - NCA 122** High Weald
- County: Kent's Landscape Assessment
 - LCA Boundary
 - KFB** Kent Fruit Belt: Kentish High Weald
 - TEISE** Teise Valley
- District/Borough: Tunbridge Wells Borough Landscape Character Assessment
 - 13** LCA 13: Paddock Wood/Five Oak Green Wooded Farmland
 - 1** LCA 1: Matfield/Brenchley Fruit Belt
 - 2** LCA 2: Horsmonden Fruit Belt
 - 3** LCA 3: Goudhurst Fruit Belt
 - 8** LCA 8: Bayham Wooded Farmland
 - 18** LCA 18: Teise Valley

Figure 3: Landscape Character. Scale 1:20 000 @ A3.

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3. LANDSCAPE ANALYSIS Continued.

- *SEO 3: Maintain and enhance the distinctive dispersed settlement pattern, parkland and historic pattern and features of the routeways of the High Weald, encouraging the use of locally characteristic materials and Wealden practices to ensure that any development recognises and retains the distinctiveness, biodiversity, geodiversity and heritage assets present, reaffirm sense of place and enhance the ecological function of routeways to improve the connectivity of habitats and provide wildlife corridors. For example by:*
 - *Encouraging new developments to follow the vernacular of the area, using locally sourced materials and adhering to the principles of the High Weald AONB design guidance’.*

County: Kent’s Landscape Assessment

- 3.2.2 The overall landscape action guideline for the Kent Fruit Belt: Kentish High Weald LCA is to **conserve and reinforce**:
- Conserve and reinforce woodland
 - Conserve and reinforce broadleaf hedgerow
 - Reinforce the small-scale of land use
 - Reinforce the use of vernacular materials
- 3.2.3 Suggested landscape actions include to:
- ‘Conserve the historic features such as small, scattered rural settlements with characteristic vernacular detail, and a consistent coverage of small-scale enclosure - hedgerow, shelterbelts and small woodlands on the ridged landscape. Historic features are common in this landscape, and it is this attribute (the consistency of these coherent features) which should be reinforced. The use of appropriate broadleaf species in woodlands and hedgerow, both in amenity and farmland planting is declining and should be reinforced to sustain the local distinctiveness.*
- The decline in the importance of fruit growing has contributed, amongst other causes, to the loss of wildlife habitats. The ecological interest of the area may be reinforced by the sensitive management of woodland and the reinstatement of wooded ghylls’.*
- District: Tunbridge Wells Borough Landscape Character Assessment
- 3.2.4 The Local Character Area should be considered in the context of the High Weald AONB, particularly the role the character area plays in the setting of the AONB. The valued features and qualities of the landscape should be conserved and enhanced. The following landscape strategy guidelines apply:
- *‘Development will need to be sensitive to the essentially rural character of the area which, with both agricultural decline and intensification occurring in tandem, is vulnerable to change.*
 - *Ensure that incremental small scale developments do not erode the character of the area.*
 - *Seek to provide an appropriate sense of visual containment for Horsmonden through protection and enhancement of its orchard setting.*
 - *Consider opportunities for further woodland copse and screen planting in association with new development in*

this open landscape’.

3.3 Settlement Character

- 3.3.1 Although a sizeable village, Horsmonden’s situation away from the highest ground means it is not especially visually prominent in the wider landscape. The majority of the village sits at between 50m and 60m AOD, just below the plateau top on the edge of a narrow valley running down to the River Teise in the east.
- 3.3.2 The focus of the village is the crossroads of Goudhurst/Brenchley Road with Lamberhurst/Maidstone Road and a village green, known as The Heath, overlooked by a local pub and some historic cottages.
- 3.3.3 The survival of a number of historic buildings along the roads contributes to the distinctive character of the village which has a designated Conservation Area. The Site is not physically or visually connected to the Conservation Area with the closest boundary to the Conservation Area laying approximately 280m to the west. Vernacular materials include red brick and red tiles, tile hung upper floors, timber-framed houses with red and blue chequered brick and half-hipped roofs.
- 3.3.4 Horsmonden’s elevation affords views to the wider countryside, including the wooded hills of the High Weald – eastwards along the valley towards Goudhurst and southwards to the wooded ridge of the edge of the High Weald AONB. Views towards the west from Horsmonden to Brenchley connect this area to its wider landscape, providing a visual transition to the High Weald AONB.

3.4 Landscape Sensitivity Assessment for Paddock Wood, Horsmonden, Hawkhurst and Cranbrook (July 2018)

- 3.4.1 The Landscape Sensitivity Assessment for Paddock Wood, Horsmonden, Hawkhurst and Cranbrook forms part of the evidence base for the new Joint Local Plan and will be used to inform Strategic Site Allocations in the Borough.
- 3.4.2 The Site has been assessed as part of Sensitivity Sub Area HO2, an area of land to the east of Horsmonden, contained between the B2162 Maidstone Road to the north and Goudhurst Road to the south, sloping generally towards the village edge. The disused Hawkhurst Branch Railway line marks Horsmonden’s Limits to Built Development. It should be noted that this sub area extends further north than the site boundary and does not include the paddock to the east of the Site, fronting Goudhurst Road.
- 3.4.3 Overall, this parcel is said to have a High/Medium-High sensitivity rating to small scale development and a High sensitivity rating to medium and large scale developments. Any development on Site is assumed to be classed within the small scale development scenario - *‘two/two and a half-storey residential dwellings – either terraced, semi-detached or detached – with associated access roads , private gardens and garaging, and with an assumed density of approximately 30-40 dwellings per hectare’.* It should be noted that all of the Sites assessed within Horsmonden were considered to have a ‘High’ rating as the highest sensitivity rating across all three development types.
- 3.4.4 The relevant guidance on potential mitigation/enhancement measures states that *‘across most of the sub-area there is little scope for mitigation as any strategic development is considered likely to result in change that significantly detracts from valued landscape characteristics. Were development to take place to the east of the former railway line, it would be important to minimise any loss of integrity of the tree corridor that marks its route, which has value*

3. LANDSCAPE ANALYSIS Continued.

Table 1: Landscape Sensitivity

as an ecological and potentially a recreational resource, and which contributes to the wooded backdrop of the village in views from the north and west’. These principles are explored more fully in **Section 6.0**.

3.4.5 The following table provides an extract from the Sensitivity Assessment as well as a site specific sensitivity description which was informed by the field survey.

Assessment Criterion	Sensitivity Description	Site Specific Sensitivity Description
Physical character	The slopes of the sub-area are relatively gentle, and consistent with the landform on which the village is located. Orchards are recognised as a locally distinctive component of landscape character in the High Weald AONB, and although the sub-area is outside of the AONB, and lacking the steeper terrain of the High Weald with which fruit growing is often associated, this land use creates some association with the designated area.	The Site includes a large area of orchard which is synonymous with the High Weald AONB characteristics. Landform on the Site rises up to the ridge line, the view from which has been used within the Sensitivity Assessment as the representative view for the sub area. Views from the ridge are likely to be highly valued by local people.
Settlement form and edge	The former railway line and lines of trees to either side of it mark a clear and consistent boundary between Horsmonden and the sub-area, although the role of this feature in defining the village edge is weakened somewhat along Maidstone Road, where sporadic development continues eastwards beyond it. Towards the northern end of the sub-area the course of the railway is embanked, and towards the southern end it runs in cut, with both physical forms adding to the distinction between settlement and countryside. The dwellings to the east of the tree line near Horsmonden Primary School, located along an unmade track, are distinct from the settlement edge and do not represent a significant urbanising influence on the sub-area.	It is acknowledged that the residential dwellings to the north of the Site are distinct from the settlement edge and that the existing tree belt does provide a sense of separation between the Site and the main village envelope. It should however also be acknowledged that outline planning permission has been granted for up to 30 no. residential dwellings at Bassett Farm, which will extend the settlement edge to the east, beyond the dismantled railway line.
Settlement setting	Tree cover along the edge of Horsmonden, and the moderate slope angle, mean that the sub-area does not form a strong visual element in the setting of the village, but the orchards that occupy most of the area, consistent with land use to the south and west of Horsmonden, makes a positive contribution to local character.	The majority of the Site is physically and visually separated from the main built up area of Horsmonden by the dismantled railway line.

Visual character	The sub-area is fairly well contained between the village-edge tree lines and the low hilltop to the east, so its contribution to inward views is limited. However there is a strong network of public rights of way crossing the area, from which rural character and the absence of urban influence can be appreciated.	The Site is fairly well contained from the wider landscape by existing vegetation and topography. The Site does feature in some inward views to the settlement from higher ground to the south, but is seen in context with the existing village.
Perceptual qualities	The village is largely screened by tree cover along the former railway line, and where houses are visible looking south down the hillside towards Goudhurst Road they have a valley location distinct from the undeveloped slopes of the sub-area. Most of the area therefore, whilst not isolated from human influence, retains a rural character, although urban-edge associations are slightly stronger in the vicinity of the recreation ground where housing extends, albeit at a low density, north-eastwards along Maidstone Road. Floodlit tennis courts immediately to the east of the recreation ground are also an urbanising influence.	The Landscape Strategy Plan sets out the principles of the proposed development, these include limiting the built form to below the ridge to ensure that any proposed dwellings do not break the ridgeline.
Historic character	There are no historic field patterns within the sub-area, but the Hawkhurst Branch railway, the ‘hop-pickers line’, has cultural heritage interest and is recognised as an ecological and potential recreational resource. Bassetts Farm, whilst itself lacking any strong historic character, forms part of a broader group of buildings (mostly to the south of Goudhurst Road, including oast houses) that do give a historic, rural character to the south-eastern edge of Horsmonden. Stiles Farm is located close to the village edge on Maidstone Road, but its farmhouse and oast are attractive historic buildings in the local vernacular that contribute to the sense of transition from urban to rural.	Whilst Bassetss Farm contributes to a historic, rural character it is in a poor and dilapidated condition and outline planning permission exists to demolish the existing farm buildings and erect up to 30 no. residential dwellings. This change in land use will change the setting and character of this approach to Horsmonden.

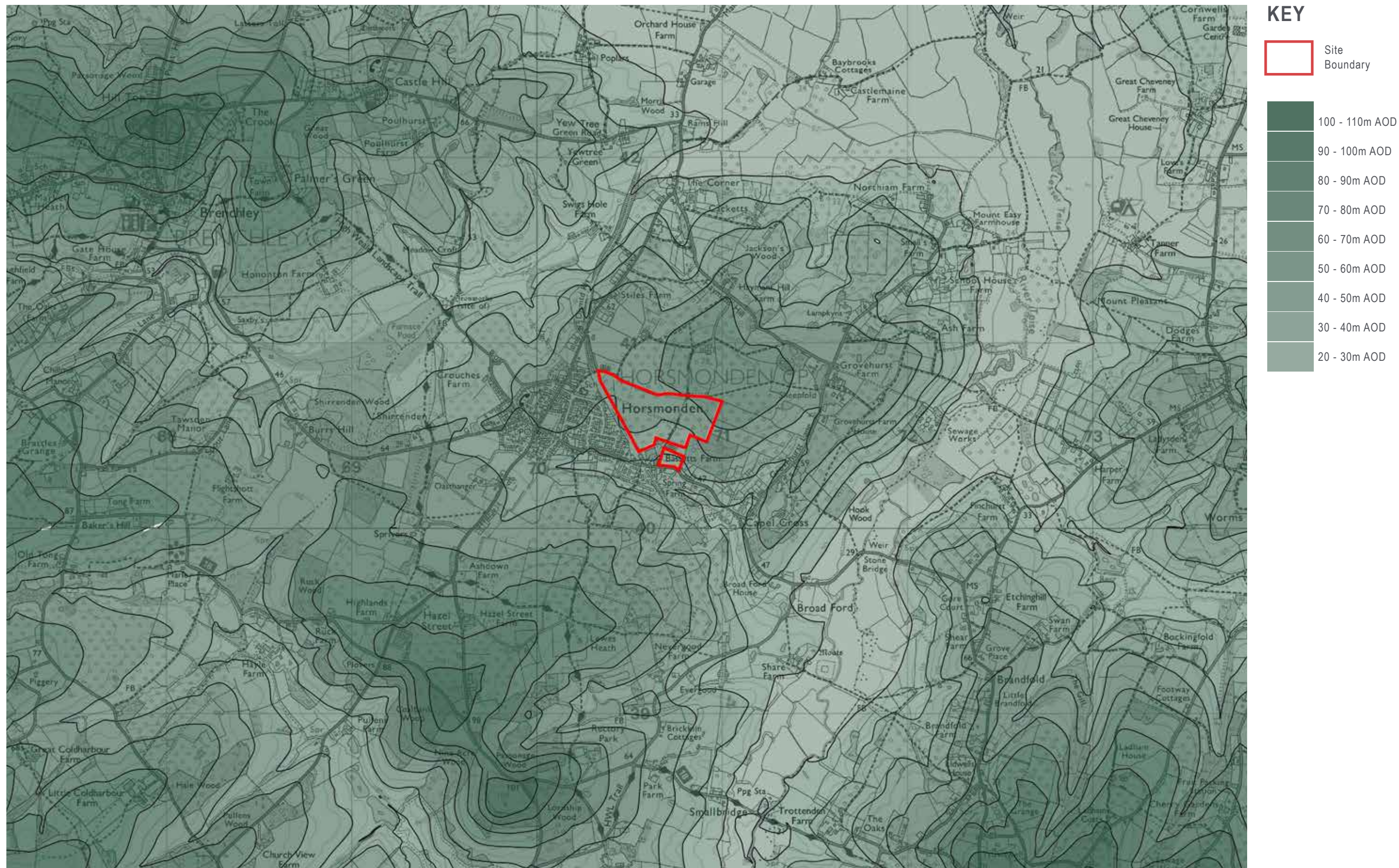


Figure 4: Landform Analysis. Scale 1:20 000 @ A3.

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3. LANDSCAPE ANALYSIS Continued.

3.5 Landscape Receptors

- 3.5.1 It is acknowledged that any development would have an impact on the landscape resource. The following landscape features have been identified as potential receptors of landscape effects of development of land east of Horsmonden.
- Topography;
 - Land use;
 - Existing vegetation;
 - The overall character of the Site;
 - The setting of PRow WT340A;
 - The setting of PRow WT341;
 - The setting of PRow WT338;
 - The character of the Horsmonden Fruit Belt Landscape Character Area (LCA 2); and
 - Settlement character of Horsmonden.
- 3.5.2 Whilst the majority of these effects will be adverse in nature during the construction phase, the proposed development of the Site provides the opportunity to introduce new areas of tree planting, in order to enhance the ecological value of the Site and locally enhance landscape character.

4. SITE AND IMMEDIATE CONTEXT

4.1 Site Description

- 4.1.1 The area (approximately 14.7ha) is located adjacent to the existing settlement edge of Horsmonden, with the majority of the Site currently in agricultural use. The Site comprises two distinct areas - the orchard area to the north and a paddock area to the east.
- 4.1.2 The Site lies outside of the current settlement boundary and in planning terms is classified as ‘countryside’. There is limited built development on site, further details of which is provided below.
- 4.1.3 Whilst outside of the site boundaries, there are a number of residential properties in close proximity to, or immediately adjacent to the Site. These include Bassetts Cottages, a row of four terraced cottages which look directly over Parcel A; and Bassetts Villas, a single residential dwelling which lies to the south of Parcel B and is relatively contained by existing boundary vegetation.

Parcel A

- 4.1.4 Parcel A, which extends to approximately 0.9ha, comprises entirely agricultural land, which at the time of survey was in use as a paddock/traditional orchard. Historically the eastern part of this parcel appears to have been used for grazing and more recently for private recreational use.
- 4.1.5 The land falls gradually to from north to south, falling from approximately 54m AOD at the northern boundary with New Bassetts Cottages, to approximately 49m AOD along the southern boundary with Goudhurst Road.
- 4.1.6 There are a number of scattered fruit trees within this parcel, however unlike Parcel B this does not appear to be used commercially. The eastern boundary is well vegetation and provides a transition into an area of nearby woodland. Part of the southern boundary is bound by a mixed native hedge/tree line, approximately 8m tall. The eastern and northern boundaries are open and defined by low level post and wire/post and rail fencing.
- 4.1.7 In the south-western corner of this parcel is an electricity sub-station which is defined by green mesh fencing.
- 4.1.8 This Parcel was assessed within the Strategic Housing and Economic Land Availability Assessment (SHELAA) as Parcel 82 and was considered a suitable site for development, subject to landscape considerations.

Parcel B

- 4.1.9 Parcel B extends to approximately 13.8ha and comprises further agricultural land which at the time of survey was in use as a commercial orchard. This parcel slopes more steeply from north-east to south-west, falling from approximately 74m AOD in the north-eastern corner to approximately 54m AOD along the southern boundary with New Bassetts Cottages and Bassetts Villas.
- 4.1.10 The site boundaries are generally well vegetated with native trees and hedgerows. PRoW WT341, a public footpath runs beyond the northern boundary of this parcel, through a tunnel of alder trees with occasional dogwood.
- 4.1.11 A Restricted Byway, PRoW WT340A, runs through this parcel of land, bisecting the orchard in to two halves. At the time of survey this PRoW appeared to be well used.
- 4.1.12 This Parcel was assessed within the SHELAA as Parcel 297 and was considered a suitable site for development, although it was noted that there are longer range views towards the Site from the wider area and that there is concern about landscape sensitivity in parts, which could be addressed by site layout and design

Wider Allocation Parcels

- 4.1.13 The wider allocation area (AL/HO 3) includes three additional parcels of land, Parcels C, D and E. A brief overview of these parcels is provided below.

Parcel C

- 4.1.14 Parcel C comprises further agricultural land, which at the time of survey was being grazed by horses. This triangular shaped area slopes gently north to south falling from approximately 68m AOD along the northern boundary to approximately 62m AOD at the southern boundary with the orchard.
- 4.1.15 The northern and western boundaries of this parcel are well vegetated with native trees and hedgerows, whilst the eastern boundary to the orchard area is defined by low level post and rail fencing.
- 4.1.16 Under Policy AL/HO 3 this area has been safeguarded as expansion land for Horsmonden Primary School.

Parcel D

- 4.1.17 Parcel D comprises the former Paddock Wood to Hawkhurst Branch Line railway. The alignment is visible, with trees marking the route and surviving embankments. This area extends to approximately 1.4ha.
- 4.1.18 The remaining tree belt is approximately 30m in width and contains a mix of native species. There is no public access to the dismantled railway line adjacent to the western site boundary.
- 4.1.19 Horsmonden railway station was on the line that ran from Paddock Wood to Hawkhurst, with intermediate stations at Horsmonden, Goudhurst and Cranbrook, and was opened in two stages. The first from Paddock Wood to Hope Mill opened in September 1893 and the second stage from Goudhurst to Hawkhurst in September 1893.
- 4.1.20 From the offset traffic on the line was light, due in part to the inconvenient locations of stations. Extra traffic was generated during the hop picking season which, at its height, brought up to 26 special trains a day with each train carrying up to 350 people. By 1959 this traffic had declined and the line was carrying less than 200 passengers a day, many of them children. The line closed completely in June 1961.
- 4.1.21 Policy AL/HO 3 states that this area should remain free from built development.

Parcel E

- 4.1.22 Parcel E, which extends to approximately 0.4ha, comprises Station Garage, a local car garage. Built form on this parcel includes the garage itself (which is the former station building) and a 1960s workshop which is located behind the original station building on what would have been the main railway line. A private residential dwelling (previously the stationmaster’s house) lies outside of the allocation boundary and fronts on to Goudhurst Road.



Figure 5: Site View Locations. Scale NTS @ A3.
 Source: JBA, September 2019.

Figure 6: Site Photographs.
Source: JBA, October 2019



View A: View west across Parcel B



View A continued: View west across Parcel B

Figure 6: Site Photographs.
Source: JBA, October 2019



View B: View east across Parcel B



View B continued: View east across Parcel B



View C: View south-west across Parcel B



View D: View north-east across Parcel A

Bridge Cottages



View E: View south-east across Parcel C

5. VISUAL ANALYSIS

5.1 General

- 5.1.1 The following section provides an assessment of views to the Site from within the study area. Photographs were taken in October 2019 representing a best case scenario in terms of the level of screening provided by existing vegetation. Views will be more open in winter when deciduous vegetation is not in leaf.
- 5.1.2 These viewpoints do not provide continuous coverage of all locations where the Site is visible, but have been selected to be either representative of the views experienced from roads/Public Rights of Way or from recognised, specific locations. A zone of theoretical visibility (ZTV) will be confirmed on preparation of detailed proposals.

5.2 Visual Envelope

- 5.2.1 The visual envelope is the extent of the area from which the Site and any proposed development is likely to be visible (refer to **Figure 7 and Inset A**).
- 5.2.2 The location of the Site on the valley slopes creates a moderately sized visual envelope, extending approximately 1.5km to higher ground to the south of the Site. The wider landscape contains an extensive network of Public Rights of Way. The principal views are from Goudhurst Road and PRoW WT340A which runs through the Site (see **Figure 7 - Visual Analysis**).

Views from within the Site

- 5.2.3 Public views can be obtained from the Public Rights of Way which cross and abut the Site (PRoW WT340A, PRoW WT338 and PRoW WT341). All of these PRoWs appear to be well used and locally valued.
- 5.2.4 As highlighted in Viewpoints 2 and 3 there are clear views across the full extent of Parcel A from PRoW WT340A, with some glimpsed views into Parcel B from this point beyond the cypress hedge which separates the main farm area from the orchards to the north. Any proposed development in Parcel A would be clearly visible in this view with glimpsed views towards development in Parcel B.
- 5.2.5 Viewpoint 6 is also taken from PRoW WT340A, beyond the cypress hedge. From this point there are clear views across the full extent of Parcel B, the existing telecommunications mast is a prominent feature in this view and breaks the skyline.

Views from the surrounding PRoW Network

- 5.2.6 PRoW WT341, a public footpath, lies to the immediate north of the Site. Views towards the Site from PRoW WT341 vary depending on users location on the footpath and levels of intervening vegetation.
- 5.2.7 Viewpoint 7 is taken from close to the junction with PRoW WT340A, from this point there are clear views across the full extent of Parcel B. Given the relative elevation, any development on Site would be clearly visible from this point.
- 5.2.8 Viewpoint 8 is taken from PRoW WT34, to the west of Viewpoint 7. At this point the PRoW has tree planting on both sides, which creates a tunnel like effect to draw the eye forwards. From this point there are glimpsed views across Parcel B through the existing tree belt, however it should be acknowledged that these views will be more open in winter when deciduous vegetation is not in leaf.
- 5.2.9 Viewpoint 9 is taken from PRoW WT34, to the east of Viewpoint 7. At this point to the PRoW runs across an open,

arable field. From this point there may be some glimpsed views towards an future development, although limiting the built form to below the ridge line will help to mitigate any visual impacts from this point.

- 5.2.10 PRoW WT338 runs to the direct north of Parcel C. From Viewpoint 10 there are clear views across Parcel C and glimpsed views towards Parcel B above the existing field access gate. From this point there may be some glimpsed views towards an future development, although limiting the built form to below the ridge line will help to mitigate any visual impacts from this point.
- 5.2.11 PRoW WT345 lies to the south of the Site and follows the valley slope from Goudhurst Road up towards the ridge at Hazel Street. As highlighted in Viewpoint 13 there are some distant, glimpsed views towards the Site above the existing orchard plantation.
- 5.2.12 Similarly, Viewpoint 14 was taken from PRoW WT347, further up the ridge to the south of the Site. From this point there are clear, distant views towards the Site beyond the existing orchard plantation. Any development within Parcel B would be visible from this point and consideration should be given to the built form to ensure that it does not break the ridge.

Views from the surrounding Road Network

- 5.2.13 Viewpoint 1 is a representative view from Goudhurst Road. From this point the existing buildings on Bassetts Farm which are to be demolished under Planning Application No. 15/505340/OUT are clearly visible. From this point the new residential dwellings which are proposed as part of 15/505340/OUT will be clearly visible. Any development within Parcel A will be seen in conjunction with this consented development and as such will not be out of place in the local context.
- 5.2.14 Viewpoint 5 is also taken from Goudhurst Road. The existing Station Garage buildings are clearly visible from this point and any demolition works as part of any future development will be clearly visible from this point. The grass verge to the south of Station Garage is protected under Local Plan Policy EN22 and its treatment needs to be carefully considered.
- 5.2.15 In Viewpoint 12, from Goudhurst Lane, just before the village gateway, the Site is entirely screened by layers of intervening vegetation.
- 5.2.16 In Viewpoint 4 from Lamberts Place, close to the junction with Goudhurst Road, the Site is barely discernible and is set behind intervening roadside vegetation. It is anticipated that the existing vegetation along the boundary of Parcel A will be retained, as such any development within Parcel A will be barely discernible from this point.
- 5.2.17 Grovehurst Lane lies approximately 500m to the east of the Site. From Viewpoint 11, which is taken outside some existing residential dwellings, the Site is barely discernible beyond layers of intervening vegetation, including an area of woodland to the east of the Site.

Other Views

- 5.2.18 It is acknowledged that there may be some long-distance views towards the Site from private residential properties in Goudhurst, however at the time of the site survey views from the public realm, namely North Road, were blocked by intervening built form. Any development on the Site would be barely discernible at such distance and would be seen in conjunction with the existing settlement edge.

5. VISUAL ANALYSIS Continued.

5.2.19 It is acknowledged that there will be views towards any development from the residential properties directing abutting the Site, namely New Bassetts Cottages and Bassetts Villas. Views across the Site will be possible from the upper storey widows of Bassetss Villa, and both the upper and lower storey windows of New Bassetts Cottages which front on to Parcel A.

5.3 Visual Receptors

5.3.1 The following people have been identified as potential receptors of visual effects of development of land east of Horsmonden:

- Users of Public Rights of Way:
 - Users of PRoW WT340A;
 - Users of PRoW WT341;
 - Users of PRoW WT345;
 - Users of PRoW WT345A; and
 - Users of PRoW WT347.
- Users of Roads:
 - Users of Goudhurst Road; and
 - Users of Lamberts Place.
- Residents of Residential Dwellings:
 - Residents of Goudhurst Road;
 - Residents of New Bassetts Cottages;
 - Residents of Bassetts Villas;
 - Residents of Goudhurst View;
 - Residents of Bridge Cottages; and
 - Residents of the future development at Bassetts Farm.

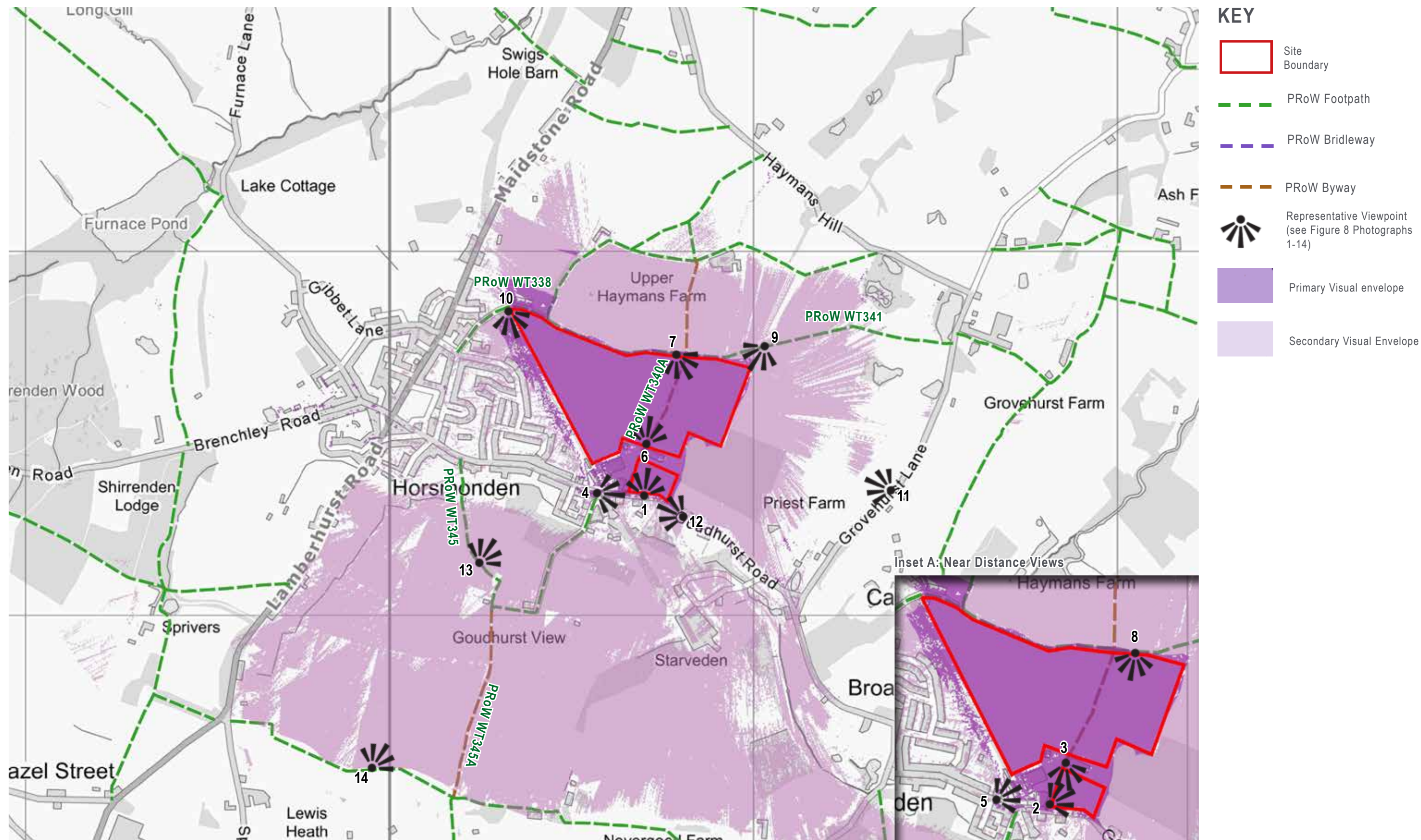


Figure 7: Visual Analysis and Locations of Representative Views.

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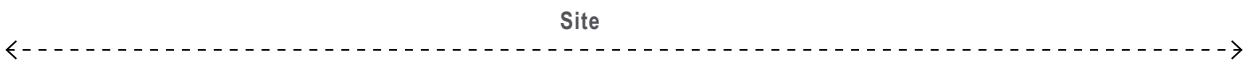
Source: JBA, October 2019



Figure 8: Representative Views.
Source: JBA, October 2019



Viewpoint 3: View south-east across the Site from PRoW WT340A



Viewpoint 4: View east towards the Site from Lamberts Place



Viewpoint 5: View east across the Site from Goudhurst Road

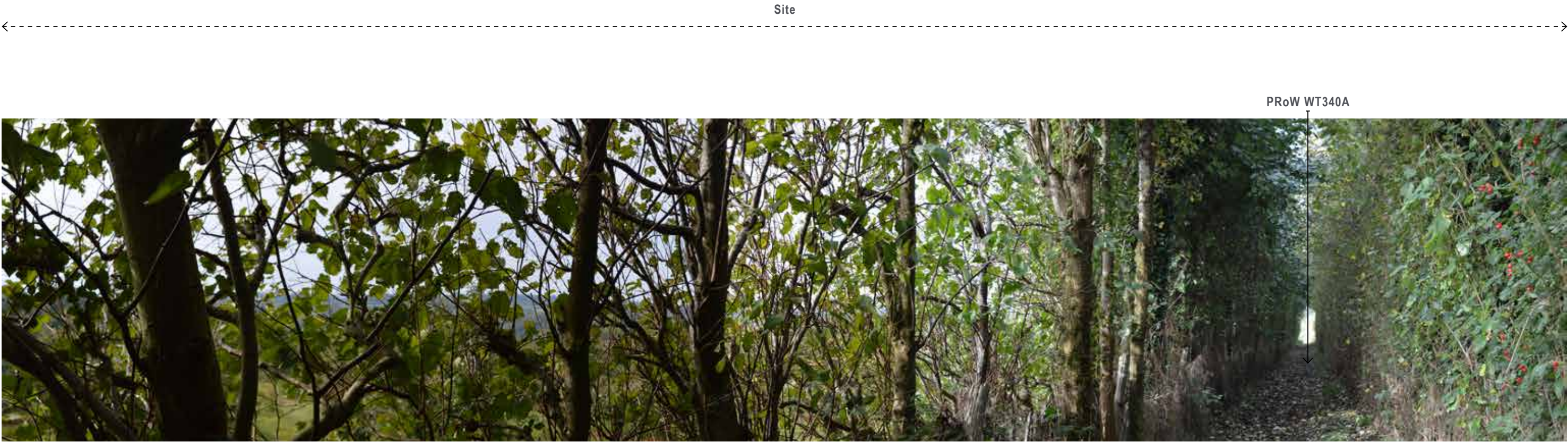


Viewpoint 6: View north across the Site from PRoW WT340A

Figure 8: Representative Views.
Source: JBA, October 2019



Viewpoint 7: View south-east across the Site from PRow WT341



Viewpoint 8: View south across the Site from PRow WT341

Figure 8: Representative Views.
Source: JBA, October 2019

←----- Site ----->

PRoW WT341



Viewpoint 9: View south-west towards the Site from PRoW WT341

←----- Site ----->

PRoW WT338



Viewpoint 10: View south-east across the Site from PRoW WT338

Figure 8: Representative Views.
Source: JBA, October 2019

←----- Site ----->

Grovehurst Lane



Viewpoint 11: View west towards the Site from Grovehurst Lane

←----- Site ----->

Goudhurst Lane



Viewpoint 12: View north towards the Site from Goudhurst Lane

Figure 8: Representative Views.
Source: JBA, October 2019



Viewpoint 13: View north-east towards the Site from PRoW WT345



Viewpoint 14: View north-east from PRoW WT347

6. SUMMARY OF CHARACTERISTICS AND OPPORTUNITIES

6.1 General

- 6.1.1 The Site is allocated in draft for development under draft Policy AL/HO 3, the full wording of which is provided overleaf.
- 6.1.2 The Illustrative Landscape Strategy Plan which is shown in **Figure 9** and described in more detail below outlines how development of the Site can comply with requirements 3, 8 and 11.

6.2 Characteristics and Opportunities

- 6.2.1 Landscape sensitivities / characteristics and opportunities for potential development, taking into account planning policy context, published landscape character guidance and observations during the site visit are set out below:
- Landform: the landform within the Site follows a shallow valley with the land rising to the north. Just beyond the Site to the north lies to ridgeline at approximately 75m AOD. Any proposed development should avoid breaking the skyline.
 - PRoW network: PRoW WT340A, PRoW WT338 and PRoW WT341 run through or abut the site boundary. These connections should be retained and provision enhanced through the introduction of additional connecting footpaths;
 - Visibility and Views: From the northernmost boundary of the Site there are panoramic views across the wider landscape. Views towards the Site are also possible from the other side of the shallow valley to the south. Again, any development on Site should avoid breaking the ridgeline;
 - Woodland structure including ancient woodlands: The Site boundaries include some strong tree belts in places. These features should be retained, enhanced and reinforced with native buffer planting;
 - Tranquillity of the Site: Due to the rural nature of local landscape and association with the nearby High Weald AONB, there is a sense of tranquillity within the Site and its surroundings;
 - Listed Buildings: The National Heritage List for England (NHLE) indicates that there are a number of Listed Buildings in close proximity to the Site. The setting of these buildings will need to be carefully considered.

6.3 Landscape Strategy

- 6.3.1 The strategy has been informed by the existing features of the site, the character of the wider landscape (and associated development / landscape management guidelines) and the visibility of the area to ensure that effects on the area are avoided, or where necessary reduced to an acceptable level.
- 6.3.2 It is proposed that this strategy will form the basis of any future planning application, alongside a formal assessment of landscape and visual effects as a standalone Landscape and Visual Impact Assessment (LVIA).
- 6.3.3 Appropriate ecological surveys should be undertaken to confirm the presence of important habitats and/or protected species. Where required appropriate mitigation will be incorporated during the design development phase, with appropriate enhancements to biodiversity included within any landscape strategy.
- 6.3.4 The existing vegetation within the site is important as it contributes to the character of the area and provides good screening value in views from both the immediate area and wider countryside. It is therefore essential that the

boundary tree belts are retained with an appropriate standoff distance.

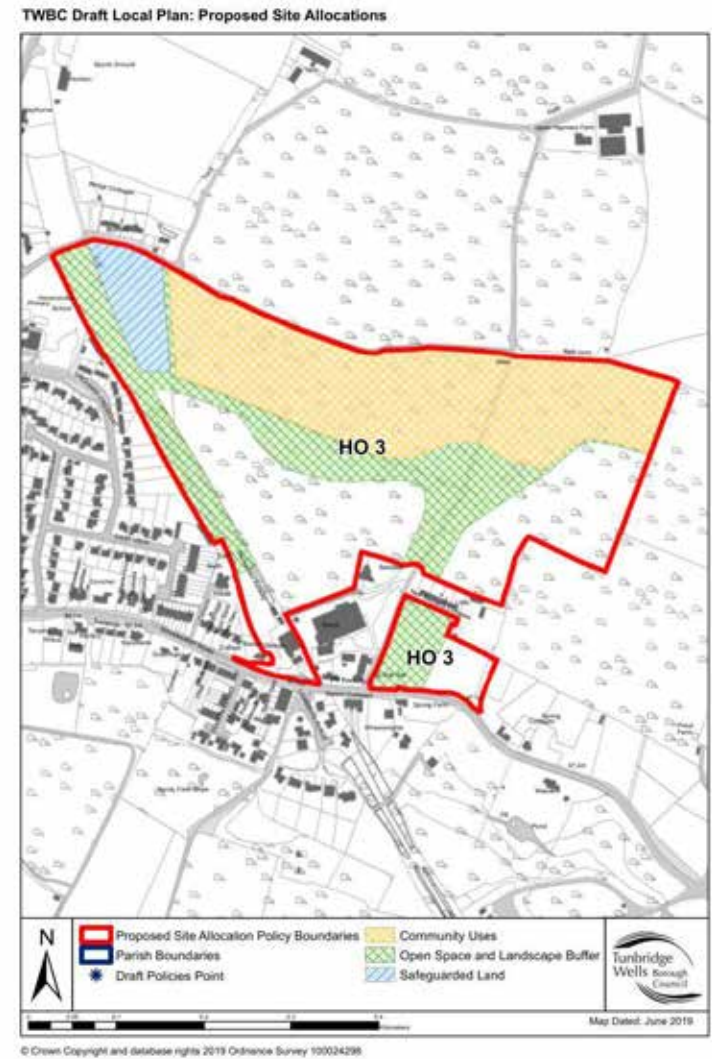
- 6.3.5 Notwithstanding the results of any detailed arboricultural or ecological surveys, to ensure the protection of existing strategic vegetation existing field boundaries, important for their landscape and ecological value, will be safeguarded with an approximate 5m buffer, with a 10-15m zone to ensure the protection of mature hedgerow trees.
- 6.3.6 It is proposed that the existing Public Rights of Way are retained in their current alignment, where the routes cross the Site they will be temporarily diverted away from the working area during the construction phase.

6.4 Suitability of the Site for Development

- 6.4.1 The Site is considered to be a suitable location in landscape and visual terms for development subject to some landscape considerations. Notwithstanding this, it is particularly desirable that potential landscape and visual impacts of any development proposals are mitigated by a strong commitment to good design in line with the NPPF and its supporting Planning Practice Guidance on Design.
- 6.4.2 Any proposed development should be informed by the characteristics and opportunities identified, taking into account the following recommendations:
- The location of proposed development areas should respond to the landscape features and characteristics that give the landscape its sense of place and local distinctiveness. For this reason, development should be kept below the 60m contour line in order to avoid breaking the ridgeline. A detailed topographical survey should be undertaken to inform the extent of the built development area and the ridge heights of proposed dwellings.
 - The built form should reflect the local settlement with the use of vernacular style materials wherever possible. Hard and soft landscaping materials should be complementary to the proposed dwellings and the local vernacular design.
 - The use of dark/earthy tones will help to integrate the proposed development into the wider landscape, particularly any proposed dwellings towards the north of the Site.
 - Proposed dwelling could adopt a vernacular style, or be more contemporary in style but with vernacular references in their design or materials.
 - Existing boundary vegetation should be retained wherever possible and reinforced where necessary by new structural planting to provide screening value and create a wooded backdrop to the proposed development.
 - Groups of trees within open space will soften the built form and integrate with the Green Infrastructure corridors, providing connectivity across the Site. A north-south view corridor from the ridge has been retained in order to allow panoramic views towards the High Weald AONB.
 - The Site should look to provide opportunities for multi-functional green infrastructure to provide ecological, climate and recreational benefits.
 - Residential streets and buildings should reflect the existing settlement form, with a transition in density and building height, creating a lower density settlement edge to the north and east.
- 6.4.3 With regards to the land use zoning as highlighted on Map 84 (overleaf), the Visual Assessment which was carried

Land to the east of Horsmonden

Map 84 Policy AL/HO 3



5.123 This site:

- Comprises mostly undeveloped land, although there is some built development in places, located adjacent to the Limits to Built Development on the east side of Horsmonden;
- The site includes an area of archaeological potential (which runs along the Hop Pickers railway line);
- It has boundaries with Goudhurst Road to the south and with Back Lane, a track road to the north. There are existing points of access to the site off Goudhurst Road;
- The eastern part, to be developed at a lower density than the rest of the site (as informed by a landscape assessment), is not included in the new LBD for Horsmonden.

Policy AL/HO 3

Land to the east of Horsmonden (CfS reference: Sites 82, 108, 297, 324 and Late Site 42)

These sites, as defined on the Horsmonden draft Policies Map, are allocated for a mixed use scheme, providing approximately 100-150 residential (C3) dwellings, and safeguarding of land for future expansion of Horsmonden Primary School and new health centre/doctors surgery.

Development on the site shall accord with the following requirements:

1. A highways assessment will inform the location of vehicular access into the site allocation area (see criterion 5 of Policies EN 1: Design and other development management criteria and TP 2: Transport Design and Accessibility);
2. Provision of pedestrian links into the village centre, including improvement of footway located on the north side of Goudhurst Road;
3. Provision of pedestrian links between western part of site and Bassetts Farm to be explored;
4. Provision of link to, and preserve amenity of, Public Rights of Way WT340a and WT341 (see criterion 4 of Policy TP 2: Transport Design and Accessibility);
5. No built development on the route of the Hop Pickers' Line unless it can be demonstrated that the route can be maintained (see Policy TP 5: Safeguarding Railway Land);
6. Archaeological assessment required (see Policy EN 7: Heritage Assets);
7. Built development on the eastern area of the site to be a lower density informed by a landscape assessment (see Policies EN 1: Design and other development management criteria and Policy EN 20: Rural Landscape);
8. Provision of on-site amenity/natural green space and children's play space and improvements to existing allotments, parks and recreation grounds and youth play space in accordance with the requirements of Policy OSSR 2: Provision of publicly accessible open space and recreation. To include the provision of a community orchard;
9. Safeguarding of land to north for future school expansion, as defined on the site allocations plan;
10. Safeguarding of land within the site for the provision of a new health centre/doctors surgery;
11. Scheme to take account of, and respect, the setting of New Bassetts cottages;
12. Demonstration through the submission of relevant and proportionate archaeological investigations (as part of any planning application) that the proposal will not cause a materially harmful impact on the archaeological environment (see Policy EN 7: Heritage Assets).

It is expected that contributions will be required towards the following if necessary, to mitigate the impact of the development:

- a. Improvements to the public realm at the centre of Horsmonden;
- b. Any other highways related works;
- c. Measures to enhance bus travel.

ILLUSTRATIVE LANDSCAPE STRATEGY

The landscape strategy plan sets out the level of strategic planting envisaged for the site in order to provide a high quality landscape setting and strong green infrastructure framework to the proposed buildings. The landscape objectives of the Proposed Development include:

- To create a comprehensive new landscape scheme which integrates with the existing development to the west, emerging development to the south and the surrounding countryside to the north and east.
- To develop and enhance the site boundaries as nature conservation habitats for a range of locally occurring species.
- To establish green corridors / landscape dominated streets that permeate the built form (north-south and west-east), connecting the site and established residential areas via a series of linked open spaces to the wider countryside in order to ensure permeability for people and wildlife.

Additional landscape measures throughout the development including new tree and hedge planting will provide a green setting to the proposed development, enhance ecological connectivity and visually integrate the development with the wider countryside.

LANDSCAPE STRATEGY PRINCIPLES

1 EXISTING VEGETATION

Save for site access, existing boundary hedgerows and trees will be retained (with buffers to development), reinforced and brought into regular, long-term management. This will protect visual amenity and landscape character as well as continuing to offer commuting and foraging opportunities for protected and locally occurring species.



2 APPROACH TO HORSMONDEN

Built form set back from Goudhurst Road behind landscape buffer to retain the landscape character of Goudhurst Road and rural approach into Horsmonden. New tree planting with open spaces will create a wooded backdrop to the development and create a new landscape dominated settlement edge.

3 SPECIES SELECTION

Any detailed landscape proposals should include native plant species of local provenance and characteristic of the local landscape character to enhance the landscape and ecological value of the proposed development's green infrastructure. See suggested planting palette below.

4 OPEN SPACES

Areas of open space to be incorporated around the perimeter of the development, providing a buffer to existing vegetation. Additional open space to be provided along the length of the existing PRoW and towards the ridge. The Open Space within Parcel A has been carefully situated to protect the amenity of existing residents and the setting of nearby Listed Buildings whilst in Parcel B key panoramic views from the ridge have been retained.



Panoramic views from the ridge

5 CONNECTIVITY

Existing Public Rights of Way and pedestrian access points on to the Site will be retained in their current alignment wherever possible. The PRoWs will be incorporated into areas of Public Open Space in order to create an attractive and rural setting.

6 STREET ALIGNMENT

Principal streets should generally span east-west in order to allow skyline impact tree planting, helping to break up views of the roofscape moving up the slope.

Built development on the Site should reflect local topography with a transition in density and building heights across the Site in order to create a landscape dominated settlement edge to the north and east.



PROPOSED PLANTING PALETTE



* Species suggestions in accordance with Tunbridge Wells Landscape and Nature Conservation Guide

KEY TO ILLUSTRATIVE STRATEGY

- Site Boundary
- Proposed Development Areas
- Proposed Pedestrian and Cycle Links (see notes)
- Existing Public Rights of Way
- Principal Site Access (see notes)
- Listed Building
- Key views (public)
- Key views (private)
- Existing watercourses
- Consented Development Area
- Key Built Frontages
- Soft Landscape
 - Existing Trees
 - Proposed Amenity Open Space
 - Indicative Area for SUDs (see notes)
 - Proposed Native Hedges
 - Proposed Native Buffer Planting
 - Proposed Natural Open Space
- Proposed Trees
 - Proposed Native Trees
 - Proposed Street Trees
 - Proposed Fruiting/Flowering Trees
- Access and Routes
 - Proposed Primary Roads (see notes)
 - Proposed Secondary Streets (see notes)
 - Proposed Footpaths through POS
- Facilities and Features
 - Proposed Local Equipped Area for Play
 - Proposed Trim Trail Equipment

- Plan to be read in conjunction with Landscape Statement;
- All vegetation locations are approximate. All vegetation to be subject to a Tree Survey in accordance with BS5837:2012 'Trees in Relation to Construction';
- Further topographical survey required in order to inform extent of northern development boundary and appropriate ridge heights;
- Highways access to be confirmed by transport consultant;
- SUDs location to be confirmed by engineers;
- Locations of existing services and proposed drainage to be confirmed by engineers;
- All structural and open space planting should use native species (of local provenance where possible); and
- Any future planning application should include detailed landscape proposals including proposed plant species and a management plan for structural vegetation and open space areas.

Figure 9: Illustrative Landscape Strategy

Source: JBA, October 2019

6. SUMMARY OF CHARACTERISTICS AND OPPORTUNITIES Continued.

out as part of this statement confirms that built development should be limited to below the 60m contour line and the existing track which spans east-west across the Site and is visible in long-distance views from the south.

- 6.4.4 The existing Public Byway will be retained in its current alignment as far as possible and will create a north-south green link through the Site.
- 6.4.5 It has been assumed that the area identified as 'community uses' would be the community orchard area referred to in Policy AL HO/3. It is not viable to retain the existing orchard and as such the proposed public open space adopts a natural parkland character with meadows and scattered orchard trees. Other potential community uses include an area of community woodland and community play spaces.

7. SUMMARY AND CONCLUSION

7.1 General

- 7.1.1 James Blake Associates Ltd. has been instructed by Persimmon Homes to produce a Landscape Statement in relation to an area of land to the east of Horsmonden, Kent, to support representations to the Royal Tunbridge Wells District Local Plan Consultation (Regulation 18).
- 7.1.2 The Site is included as part of the SHELAA 2018 (Parcels 297 and 82), and was considered to have potential capacity for future development. This statement provides a more detailed assessment of the Site, identifying the characteristics and opportunities of the Site, and the mitigation required to ensure that the effects on the landscape character of the area and visual amenity can be satisfactorily addressed.
- 7.1.3 The analysis confirms that the development of the Site is acceptable in principle. The subsequent landscape strategy describes how the effects on the landscape character of the area and visual amenity can avoided and where necessary reduced by the retention and safeguarding of existing vegetation and new landscaping.
- 7.1.4 The management of existing vegetation, areas of new planting and the creation of wildlife habitats provides significant opportunities for habitat creation. Recreational benefits will include the retention of existing Public Rights of Way and introduction of new areas of Public Open Space.

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APPENDIX 2 – TRANSPORT APPRAISAL

Land East of Horsmonden,

Transport Appraisal

15 November 2019

Prepared for
Persimmon Homes South East



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Persimmon Homes South East

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Drawings

19242-01-001 – GOUDHURST ROAD PROPOSED FOOTWAY

19242-01-002 – GOUDHURST ROAD PROPOSED SITE ACCESS

Appendices

APPENDIX A – PARAMETER PLAN

1. Introduction

Preamble

- 1.1 Markides Associates (MA) have been instructed by Persimmon Homes South East (PHSE) to prepare this Transport Appraisal in support of their proposals for a residential development located on the eastern edge of the village of Horsmonden, with site location indicated below in **Figure 1.1**.

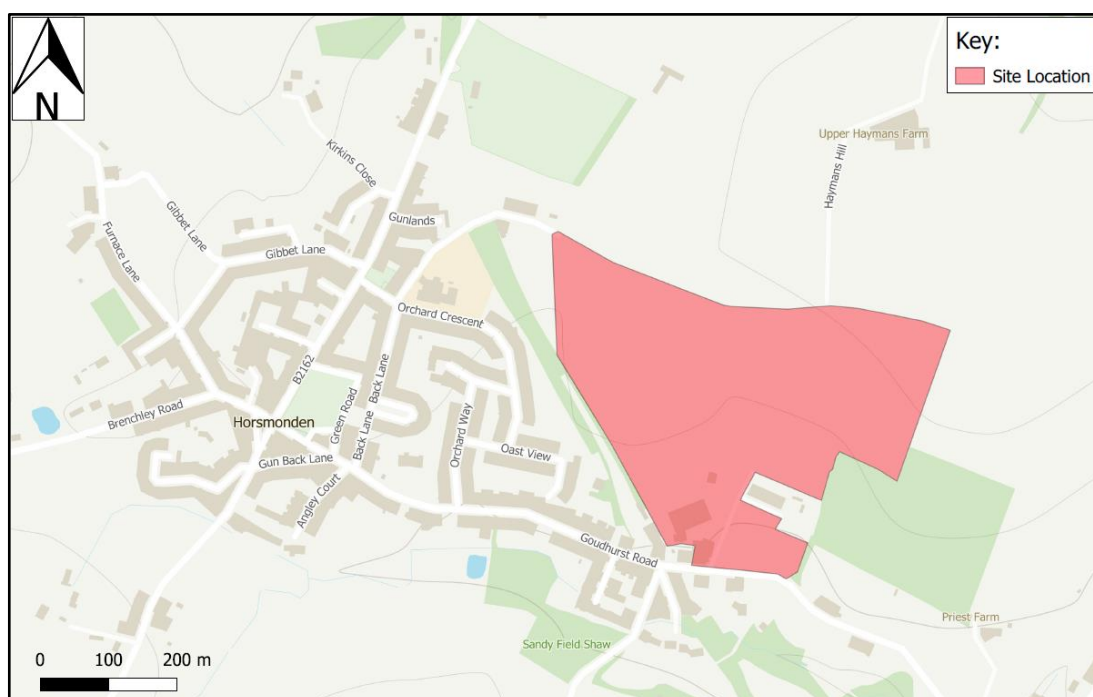


Figure 1.1 – Site Location Plan

- 1.2 The site is bound to the south by Goudhurst Road, from which it is currently accessed via a simple priority junction. To the north the site is bound by an agricultural access track, which to the west connects with Back Lane, an informal access road currently serving a small number of residential properties. To the east the site is bound by undeveloped agricultural land and to the west the site is bound by the dismantled Hawkhurst Branch railway, beyond which is established residential development and the village centre.
- 1.3 The site is located within the administrative boundary of Tunbridge Wells District Council (TWDC), with Kent County Council (KCC) being the relevant local highway authority.

Draft Allocation

- 1.4 TWDC are currently consulting on their Draft Local Plan (DLP), a document that will provide the basis for determining the suitability of development proposals within the district to 2036, as well as including specific planning policies against which future planning applications will be assessed and identifying specific site allocations.

- 1.5 Policy STR/HO1 *The Strategy for Horsmonden Parish*, details the aim for approximately 225-305 new residential dwellings to be delivered across three sites within Horsmonden, which includes site reference AL/HO3, *Land to the east of Horsmonden*, with extent detailed below in **Figure 1.2**.

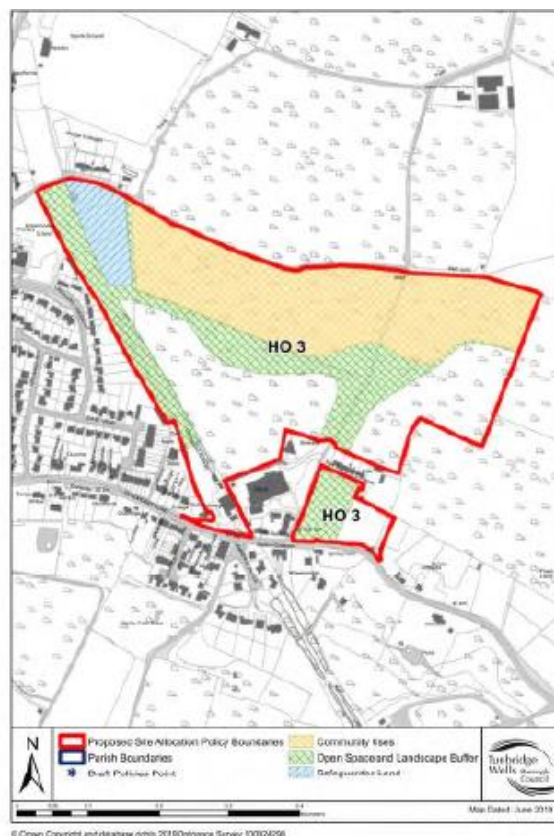


Figure 1.2 – Land to the east of Horsmonden

- 1.6 This extent encompasses the subject site falling within the control of PHSE, as well as some additional land parcels falling outside the control of PHSE. Development across the wider allocation site is governed by DLP Policy AL/HO3, which envisages a scale of development of approximately 100-150 dwellings, as well as a safeguarding of land for an expansion of Horsmonden Primary School and a new health centre/doctor's surgery. In terms of transport and access, Policy AL/HO3 identifies that development on the site will need to be supported by:

- A highways assessment, to inform the vehicular access;
- Pedestrian links into the village centre, including an improvement to footways located on the north side of Goudhurst Road;
- Provision of pedestrian links between the western part of the site and Bassett's Farm;
- Provision of pedestrian links to and preservation and amenity of Public Rights of Way (PROW) WT341.

- 1.7 The policy also states that contributions will be expected to mitigate the impact of development in terms of highway related works and measures to enhance bus travel.

Consented Site

- 1.8 Residential development at the site is not without precedent, with part of the site benefiting from planning approval (application reference 15/505340/OUT) granted in January 2017 for a development with description as follows:

Outline application for the demolition of existing buildings (with the exception of the building at the corner of access road) and for the erection of up to 30 dwellings (Point of Access to site not reserved).

- 1.9 The application established the principle of vehicular access from Goudhurst Road via the introduction of an improved simple priority junction. Visibility requirements were established based on recorded 85th percentile speeds along Goudhurst Road of 40.06mph in a westbound direction and 39.88mph in an eastbound direction, which dictated visibility requirements of 2.4m x 65m in each direction using Manual for Streets parameters.
- 1.10 The development proposals were also supported by detailed designs that demonstrated a 1.2m wide footway could be delivered along Goudhurst Road from the site access to the existing footway network, either within land controlled by the Applicant or public highway, ensuring a safe pedestrian link from the site to the social infrastructure within the village centre.
- 1.11 The planning application was supported by a Transport Statement, which demonstrated that the development proposals were in accordance with relevant transport related planning policy and was deemed acceptable by KCC highways officers

Development Proposals

- 1.12 PHSE envisage that the site within their control has capacity to accommodate approximately 175 units, located within the southern half of the site, with the north-western part of the site reserved for the envisaged community uses.
- 1.13 A parameter plan is provided at **Appendix A**.
- 1.14 Vehicular and pedestrian access to the site is proposed from Goudhurst Road, with additional pedestrian access only accommodated via Back Lane to the north-west, providing an alternative, and in some cases shorter, walking route to existing social infrastructure within the village centre such as Horsmonden Primary School.
- 1.15 The site will be designed to reflect the principles of Manual for Streets and the Kent Design Guide, with car and cycle parking provision in accordance with relevant standards.

Report Scope

- 1.16 This initial Transport Appraisal has been prepared in support of PHSE's promotion of the site as an appropriate place for residential development as part of the DLP consultation period.
- 1.17 The Appraisal considers the sustainability credentials of the site in terms of access to social infrastructure and access by sustainable modes of travel.
- 1.18 The Transport Appraisal will then demonstrate that the site can be safely accessed by both vehicular and pedestrian modes of travel.
- 1.19 The Transport Appraisal will then describe the development proposals.
- 1.20 The Appraisal will then review relevant transport related planning policy within the DLP and wider guidance that will inform the emerging proposals, demonstrating compliance.

Planning Application

- 1.21 Should a formal planning application for the development ever be submitted, it would need to be supported by a Transport Assessment (TA) and Travel Plan (TP).
- 1.22 The TA would assess the implications of the development proposals in detail, informed by off-site traffic impact analysis and junction capacity analysis, identifying any requirement to mitigate the impact of the scale of development across the local highway network. This mitigation could take the form of junction capacity improvements and/or enhancement to the existing pedestrian, cycle and public transport networks. The scope of the TA, including study area, would be discussed and agreed with TWDC and KCC prior to the submission of the application.
- 1.23 The TP would set out a range of measures and management strategies to promote and encourage sustainable travel in favour of single occupancy vehicle travel, such as a site wide car-share database, secure and sheltered cycle parking and training and/or school walking buses.

2. Existing Situation

Site Location

- 2.1 The site is located on the eastern edge of the village of Horsmonden, bound to the south by Goudhurst Road, from which it is currently accessed via a simple priority junction. To the north the site is bound by an agricultural access track, which to the west connects with Back Lane, an informal access road currently serving a small number of residential properties. To the east the site is bound by undeveloped agricultural land and to the west the site is bound by the dismantled Hawkhurst Branch railway, beyond which is established residential development and the village centre.

Local Facilities and Amenities

- 2.2 Whilst Horsmonden is a relatively rural settlement, it does benefit from accommodating a range of social infrastructure that acts as typical trip attractors for residential land uses, examples of which are detailed below in **Table 2.1**, along with walk distance from both Back Lane and the main site access, on the assumption that a pedestrian link is provided along Goudhurst Road.

Table 2.1: Local Facilities and Amenities

Facility	Location	From Goudhurst Road Access		From Back Lane Access	
		Distance	Journey Time	Distance	Journey Time
Heath Stores Village Shop & Delicatessen	Goudhurst Road	680m	9 Minutes	605m	8 Minutes
Horsmonden Kindergarten	Back Lane	810m	10 Minutes	290m	4 Minutes
Horsmonden Primary Academy	Orchard Crescent	865m	11 Minutes	375m	5 Minutes
Doctors Surgery	Lamberhurst Road	760m	9 Minutes	730m	9 Minutes
Heath Pharmacy	Maidstone Road	720m	9 Minutes	570m	7 Minutes
Horsmonden Village Hall	Back Lane	760m	9 Minutes	325m	4 Minutes
Horsmonden Social Club	Green Lane	720m	9 Minutes	450m	6 Minutes
Mobile Library	Back Lane	600m	7 Minutes	485m	6 Minutes
The Heath (Village Green)	Goudhurst Road	640m	8 Minutes	430m	5 Minutes
Horsmonden Sports Ground & Cricket Club	Maidstone Road	1.25km	16 Minutes	560m	7 Minutes
Horsmonden Lawn Tennis Club	Maidstone Road	1.36km	17 Minutes	650m	8 Minutes
Gun & Spitroast Public House	Goudhurst Road	650m	8 Minutes	570m	7 Minutes

- 1.1.1 **Table 2.1** therefore confirms that a range of land uses are located within close proximity, which ensures that these trip attractors can be accessed by modes other than the private car and realistically on foot, thereby reflecting fundamental requirements of national, regional and local planning policy for creating sustainable communities. Indeed, the Chartered

Institute of Highway's and Transportation's (CIHT) March 2015 guidance document, 'Planning for Walking,' states that 'walkable neighbourhoods' are those with a typical catchment of around 800m, with many of the key identified land uses being within this walk distance threshold, although it is acknowledged that internal walk distances within the site will need to be taken into account. This social infrastructure is indicated below in **Figure 2.1**.

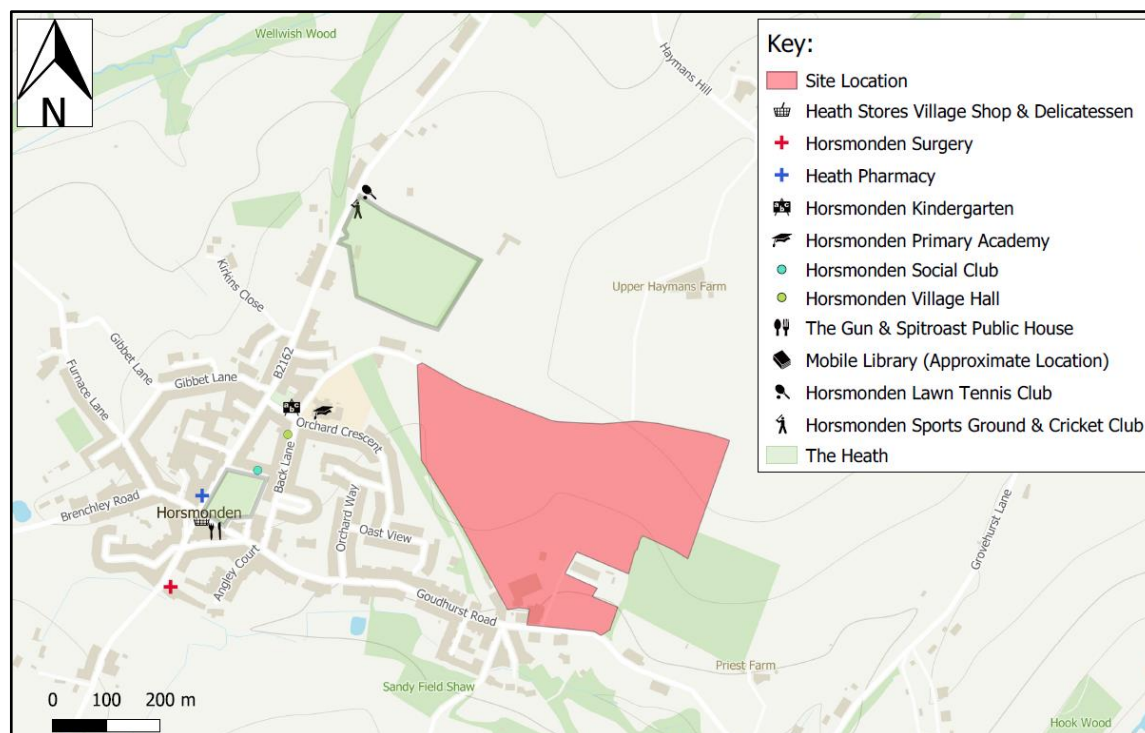


Figure 2.1 – Social Infrastructure

Pedestrian and Cycle Infrastructure

- 2.3 From the existing site access, there is presently no footway provision along Goudhurst Road in either direction.
- 2.4 West of the site access, along the northern edge of the carriageway, a footway commences opposite the junction with Olivers Crescent, connecting with the village centre, varying in width from 1.2m to 1.5m, with limited streetlighting provision.
- 2.5 In terms of public rights of way (PROW), the existing site access is an established restricted byway (WT340A/2), providing access to other farmland and connecting with a network of public footpaths to the north. The agricultural track to the north of the site, which connects with Back Lane, is an existing public footpath (WT341/1), which connects with Grovehurst Lane to the north, specifically referenced in the allocation policy as needing to be preserved. This PROW network is indicated below in **Figure 2.2**, taken from the KCC website.

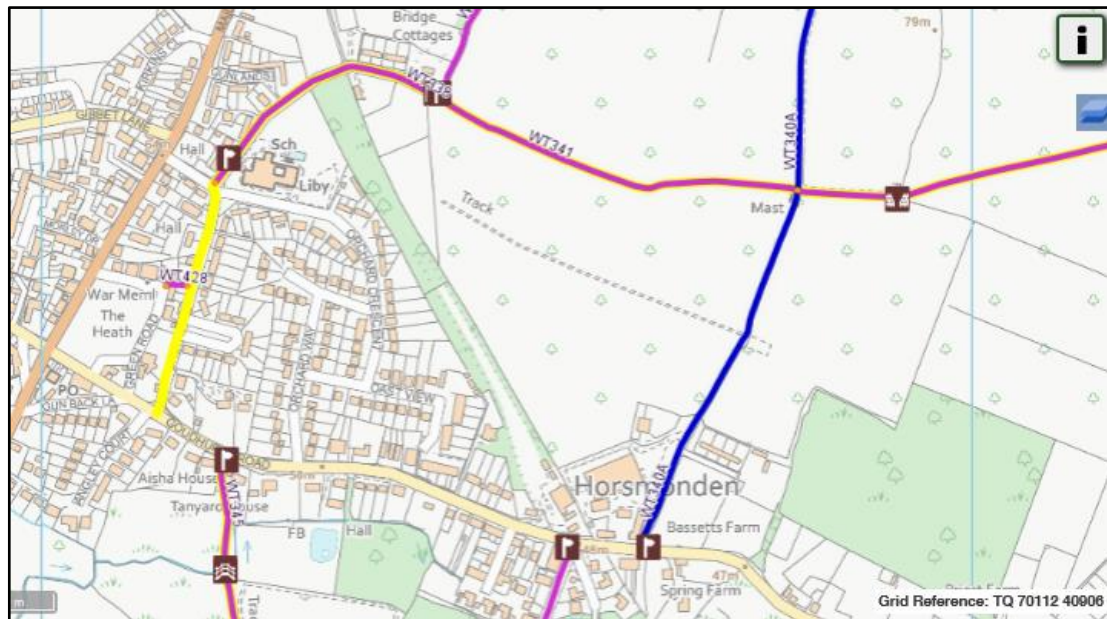


Figure 2.2 – PROW Network.

- 2.6 In terms of cycling routes, given the rural nature of the location, there are no officially marked routes that directly pass the site or enter into Horsmonden. Nevertheless, National Cycle Network Route 18 is located to the south of the site, approximately 2.2km away via Goudhurst Road and Lamberhurst Road. This route extends from Canterbury, passing Horsmonden and provides a direct cycling link with Royal Tunbridge Wells.
- 2.7 Whilst not currently operational, the Tunbridge Wells Cycling Strategy 2016 includes proposals to convert the abandoned railway line that runs through Horsmonden into a leisure cycle route, branded as the Hop Pickers route, which will provide a traffic free connection between the village and the larger settlement of Paddock Wood to the north, a distance of 5km, with alignment detailed below in **Figure 2.3**, taken from the Cycling Strategy.

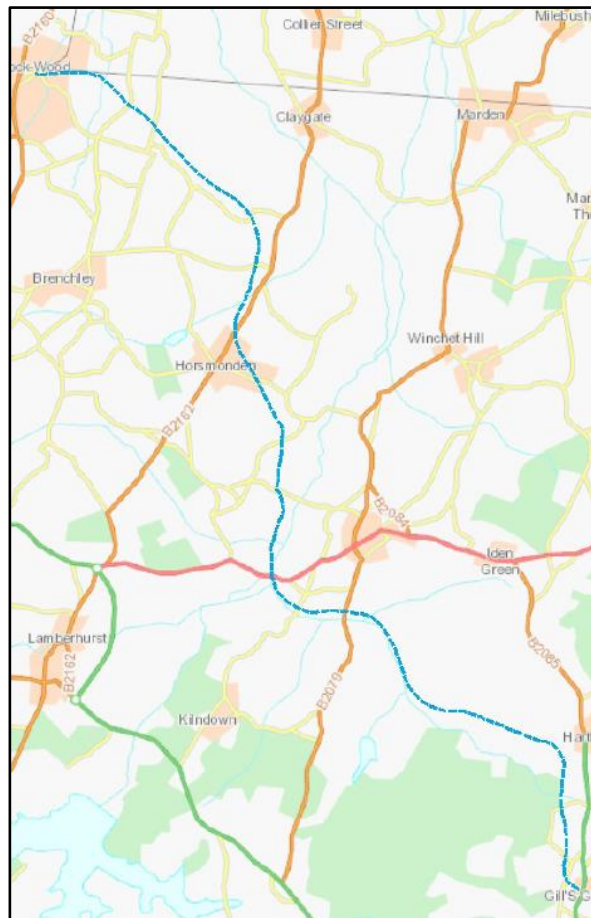


Figure 2.3 – Hop Picker route (in blue)

Public Transport Infrastructure

Local Bus Services

- 2.8 A number of local bus services can be accessed from the centre of Horsmonden, with bus stops located on Brenchley Road, Goudhurst Road and Maidstone Road, accommodating established bus services that provide access to larger settlements such as Royal Tunbridge Wells and Paddock Wood, from which National Rail services can also be accessed.
- 2.9 It is acknowledged however that there is only one service (297) that has a frequency that complements traditional commuting periods, with the other services occurring during school hours or on limited days of the week.
- 2.10 **Table 2.2** below sets out the routes, service frequencies and stops available within walking distance of the site.

Table 2.2: Local Bus Service Provision

Service	Nearest Stop	Route	Peak Frequency		
			Weekday	Saturday	Sunday
266	Brenchley Road	Kilndown - Lamberhurst - Wateringbury - Maidstone	Tuesdays Only 1 AM & 1 PM Services in Both Directions	No Service	
267/268	Goudhurst Road	Hawkhurst to Tonbridge via Paddock Wood	Schooldays Only 1AM and 1PM Service	No Service	
296	Maidstone Road / Brenchley Road	Paddock Wood - Horsmonden - Pembury - Tunbridge Wells	Mondays and Thursdays Only 1 AM & 2 PM Services to Tunbridge Wells and 1 AM & 1 PM Service to Paddock Wood	Mondays and Thursdays Only 2 PM Services to Tunbridge Wells and 1 AM & 1 PM Service to Paddock Wood	No Service
297	Brenchley Road / Goudhurst Road	Tenterden - Rolvenden - Cranbrook - Goudhurst - Tunbridge Wells	3 AM & 4 PM Services to Tunbridge Wells and 2 AM & 4 PM Services to Tenterden	3 AM & 4 PM Services to Tunbridge Wells and 2 AM & 5 PM Services to Tenterden	No Service

- 2.11 Whilst direct services to some larger settlements during typical commuting times are limited, Horsmonden residents are also able to use the 297 service and change at Matfield to access service 6 to Paddock Wood or change at Gore Court to the east to access service 27 to Marden.

Local Rail Services

- 2.12 Paddock Wood Station is managed by Southeastern and is a completely accessible station, with step free access available from the entrance to all platforms. Bus access to the station can be achieved as described above.
- 2.13 In terms of accessing the station by car, there are 481 standard car parking spaces and an additional 11 disabled car parking spaces. The daily parking rate is £6.30 during peak times and £5.70 off-peak, with a Saturday rate of £3.50 and a Sunday rate of £1.00. For commuters, weekly, 3-monthly, 6-monthly and annual rates are also available.
- 2.14 Paddock Wood provides access to a range of destinations including London Charing Cross, London Bridge, Tonbridge, Maidstone, Strood Ashford, Dover and Ramsgate, with typical weekday peak services including:
- 2 trains per hour to London Charing Cross via Tonbridge;

- 1 train per hour to Dover Priory;
 - 2-3 trains per hour to Canterbury West;
 - 1-2 trains per hour to Ramsgate via Dover and Canterbury, dividing at Ashford; and
 - 1-2 trains per hour to Strood via Maidstone.
- 2.15 Marden Station is the preceding station to Paddock Wood and does not benefit from being on the Strood line, instead providing direct access to London Charring Cross. Marden Station accommodates 177 car parking spaces.
- 2.16 Public transport infrastructure is indicated below in **Figure 2.4**.

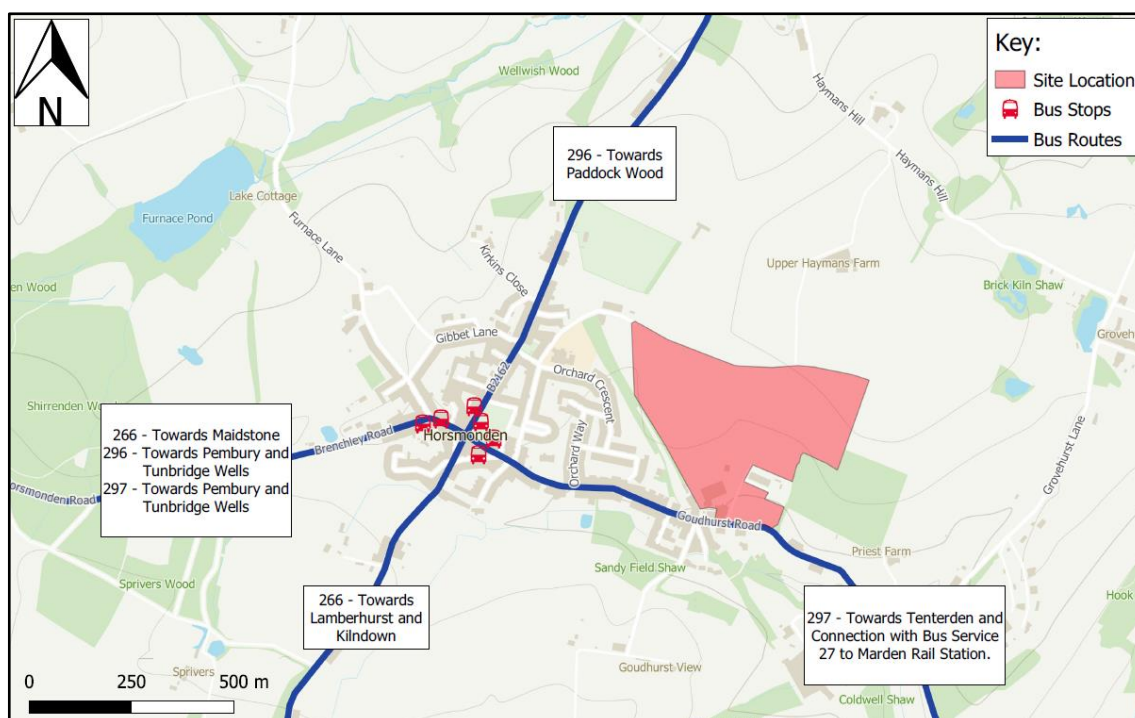


Figure 2.4 – Public Transport Infrastructure

Local Highway Network

- 2.17 Vehicular access into the site is currently achieved from a simple priority junction with Goudhurst Road. Goudhurst Road is a single-carriageway road operating in an east-west alignment between the centre of Horsmonden to the west and its junction with Summer Hill / B2079 in the east. Within vicinity of the site access, Goudhurst Road is subject to a 30mph speed limit.
- 2.18 To the west, Goudhurst Road forms a crossroads junction with the B2162 Maidstone Road/Lamberhurst Road, which to the south connects with the A21, providing access to the strategic highway network via the M25.

Existing Traffic Flows

- 2.19 Automatic traffic counts (ATC) were undertaken on Goudhurst Road, at a point west of the site access between Tuesday 15th October 2019 and Monday 21st October 2019, with peak hour and daily (07.00-19.00) traffic flows detailed below in **Table 2.3**.

Table 2.3: Goudhurst Road Traffic Flows

Time Period	Direction	Observed Traffic Flow
Weekday AM Peak	Eastbound	119
	Westbound	256
	Total	375
Weekday PM Peak	Eastbound	332
	Westbound	159
	Total	491
Weekday 07.00-19.00	Eastbound	1757
	Westbound	1667
	Total	3424

- 2.20 **Table 2.3** demonstrates that traffic flows along Goudhurst Road are relatively low. This can be demonstrated by comparing these traffic flows with DMRB TA46/97 Traffic Flow Ranges for Use in the Assessment of New Rural Roads, which details that the capacity of a 7.3m wide single carriageway new rural road would be up to 13,000 vehicles per day, over 300% more than the observed traffic flows.
- 2.21 The ATC survey was also used to source vehicle speeds, with a second ATC installed approximately 100m east of the site access to record westbound vehicle speeds on approach to the site access. **Table 2.4** below details the observed average and 85th percentile speeds.

Table 2.4: Goudhurst Road, West of Site Access – Vehicle Speeds (mph)

Direction	Average Speed	85 th Percentile Speed
Eastbound	32.3	38.5
Westbound	31.1	35.7

- 2.22 **Table 2.4** details eastbound 85th percentile speeds of 38.5mph and westbound 85th percentile speeds of 35.7mph. Comparing these observed speeds with the speed surveys recorded in support of application reference 15/505340/OUT), it is apparent that the eastbound speeds are over 1mph less, with the westbound speeds being approximately 4mph less, with the latter due to the current survey being undertaken closer to the proposed site access and therefore influenced more by the 30mph speed limit, which is appropriate.

Collision Statistics

- 2.23 A brief review of the website crashmap.co.uk, which plots UK collision data, indicates that there have been no recorded incidents at the site access location within the last 5-years.

Travel Patterns

- 2.24 The 2011 Census has been reviewed to establish the existing method of travel to work of residents within the Middle Super Output Area (MSOA) within which the site is located, Tunbridge Wells 011, with this journey purpose considered to be a reasonable proxy for all journey purposes generated by existing residents. This is summarised below as **Table 2.55**.

Table 2.5: Existing Travel Patterns

Method of Travel to Work	%
Underground, metro, light rail or tram	0%
Train	17%
Bus, minibus or coach	1%
Taxi	0%
Motorcycle, scooter or moped	1%
Driving a car or van	68%
Passenger in a car or van	4%
Bicycle	1%
On foot	7%
Other method of travel to work	1%

- 2.25 **Table 2.5** therefore indicates that the significant majority of commuting trips within this area are undertaken by car (68%). Whilst a reasonable proportion of existing residents also travel by train (17%), this is likely to be reliant on either a public bus or car trip to access adjacent stations.

3. Development Proposals

Scale of Development and Proposed Site Layout

- 3.1 PHSE envisage that the site within their control has capacity to accommodate approximately 175 units.
- 3.2 A parameter plan is provided at **Appendix A**.
- 3.3 The residential units will be located within the southern half of the site, with the north-western part of the site reserved for the envisaged community uses referenced under the allocation.
- 3.4 The internal road network and footway network will be designed to reflect the principles of Manual for Streets and the Kent Design Guide.

Pedestrian Access

- 3.5 Reflecting the same strategy adopted by application 15/505340/OUT, pedestrian access to the site will be via the introduction of a 1.2m footway from the Goudhurst Road site access, along the northern kerbline, connecting with the existing footway provision to the west. As was previously agreed, the footway will be reliant on sections with retaining structures and sections that are raised above the carriageway with protective barriers, with any subsequent planning application supported by detailed designs.
- 3.6 The footway alignment is indicated in principle of drawing number **19242-01-001**.
- 3.7 In addition to Goudhurst Road, the development proposals will benefit from the established PROW that runs along the northern site boundary, allowing pedestrians to access Back Lane, providing a more direct and shorter route to a number of land uses within the village, such as the primary school.

Cycle Access and Parking

- 3.8 Cycle access to the site will be via Goudhurst Road and Back Lane, with the latter able to share the route with pedestrians into the site, being a traffic free route apart from the existing residential units that the track currently serves.
- 3.9 The development proposals also do not preclude the delivery of the Hop Pickers route and indeed will allow for future connections with the route from the internal site layout, encouraging the uptake of this mode of travel to access Paddock Wood.
- 3.10 The development proposals will include secure and sheltered cycle parking in accordance with relevant parking standards.

Vehicle Access

- 3.11 Reflecting the same strategy adopted by application 15/505340/OUT, the development proposals will deliver an improved simple priority junction with Goudhurst Road, with this application having already demonstrated visibility requirements can be achieved based on more onerous observed speeds. This junction form remains appropriate for this scale of development.
- 3.12 Again reflecting the requirements of the previous approval, the development proposals will also maintain a 6m carriageway width on Goudhurst Road, should some carriageway be needed to accommodate the 1.2m footway as described above.
- 3.13 The proposed vehicular access arrangement is indicated on drawing **19242-01-002**.

Car Parking

- 3.14 The development proposals will include car parking in accordance with the relevant parking standards, both in terms of form and quantum.
- 3.15 The development proposals will also include the provision of electric charging facilities within this car parking stock.

Sustainable Travel Strategy and Mitigation

- 3.16 In addition to the design features described above to encourage sustainable travel, such as improved pedestrian connections, cycle parking and future proofing connections with the Hop Pickers route, the development proposals will encourage and support sustainable travel via other measures, listed as follows:
- The implementation of a Travel Plan, which will:
 - Include a car share database;
 - Arrange for cycle training and favourable purchase terms at a local supplier;
 - Distribute a Welcome Pack to residents, informing them of the sustainable transport infrastructure that is available, such as bus routes;
 - Arrange for a walking bus from the site to the local primary school.
- 3.17 The development is also of a scale that could potentially provide financial support to improve bus services operating from Horsmonden to adjacent settlements and/or National Rail stations, subject to financial modelling and discussions with TWDC/KCC. This could involve the introduction of increased frequencies of existing services, or potentially the introduction of a bespoke service that operates directly from Horsmonden to key destinations during peak periods only.
- 3.18 Such improvements are indicated on **Figure 3.1**.

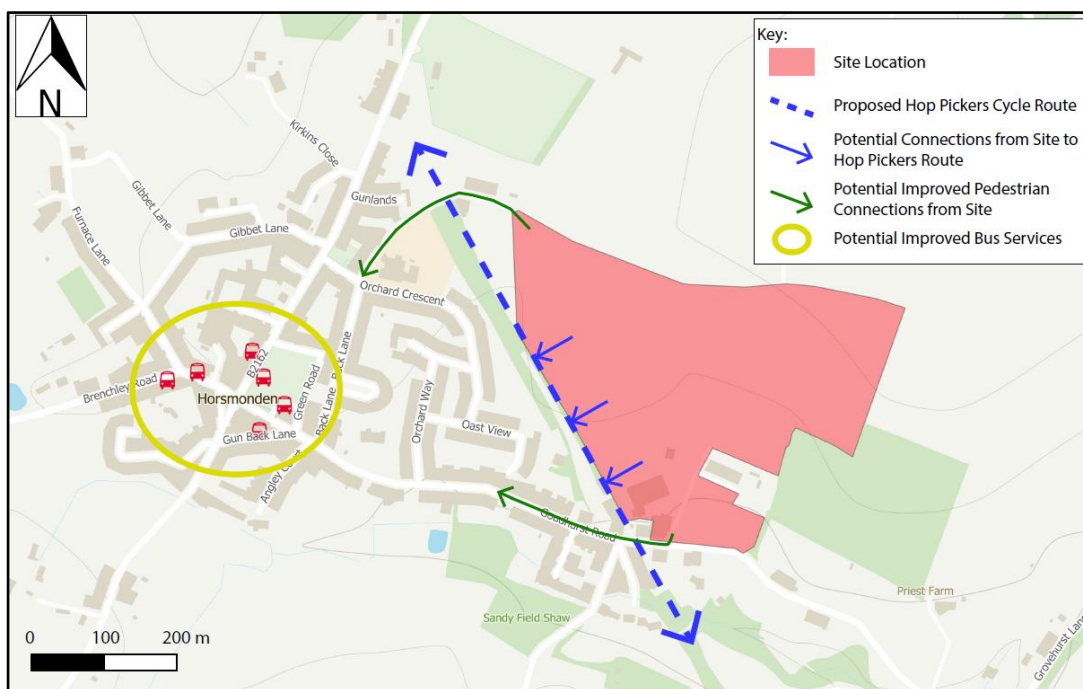


Figure 3.1 – Potential Transport Improvements

4. Traffic Generation, Distribution and Site Access Capacity Assessment

Introduction

- 4.1 This section of the Transport Appraisal estimates the vehicular trip generation associated with the proposed scale of development and distributes these traffic flows across the local highway network, before undertaking a capacity assessment of the proposed site access.
- 4.2 An eventual planning application would be supported by a Transport Assessment that will include a detailed capacity assessment across the wider highway network, with study area to be agreed with TWDC and KCC. Depending on the impact of this additional development traffic, mitigation strategies will be devised where necessary.

Traffic Generation

- 4.3 The industry standard TRICS database has been used to source vehicular trip rates that are representative of the development site. Proxy site selection criteria was adopted as follows:
- Private Houses
 - Located within South East/South West Regions
 - Located outside town centre and edge of town centre locations; and
 - Sites with bedroom ratios in excess of 2 bedrooms per unit.
 - A highways assessment, to inform the vehicular access;
- 4.4 This resulted in 14 representative sites, with trip rates per unit detailed below for traditional network peak hours (08.00-09.00 and 17.00-18.00) and across the day detailed below in **Table 4.1**.

TABLE 4.1: VEHICLE TRIP GENERATION – 175 HOMES

Trips	AM Peak (08:00-09:00)			PM Peak (17:00-18:00)			Daily Flows		
	In	Out	Total	In	Out	Total	In	Out	Total
Trip Rate per dwelling	0.151	0.394	0.545	0.339	0.146	0.485	2.325	2.357	4.682
Trips (175 dwellings)	26	69	95	59	26	85	407	412	819

- 4.5 **Table 4.1** therefore confirms that the proposed scale of development is anticipated to generate in the order 95 vehicle movements during the AM peak and 85 vehicle movements during the PM peak, with 819 vehicle movements across the day (07.00-19.00).

Trip Distribution

- 4.6 These vehicle trips have been distributed to/from the site access and across the local highway network using 2011 Census data and specifically the existing workplace destinations of residents within the Middle Super Output Area (MSOA) within which the site is located, Tunbridge Wells 011. Whilst it is acknowledged that other journey purposes, such as education trips, retail trips etc. may have a different trip distribution profile, this journey purpose acts as a reasonable proxy.
- 4.7 This analysis reveals that the dominant direction of travel will be from Goudhurst Road west of the site access, with only 17% of trips travelling via the east. The dominant movement then continues to/from the west at the Goudhurst Road junction with the B2162 Maidstone Road/B2162 Lamberhurst Road/Brenchley Road junction, due to the influence of Royal Tunbridge Wells, with distribution profile detailed below in **Figure 4.1**, with these proportions having been applied to the AM and PM peak hour total trip generation traffic flows, detailed below in **Figure 4.2** and **4.3**.

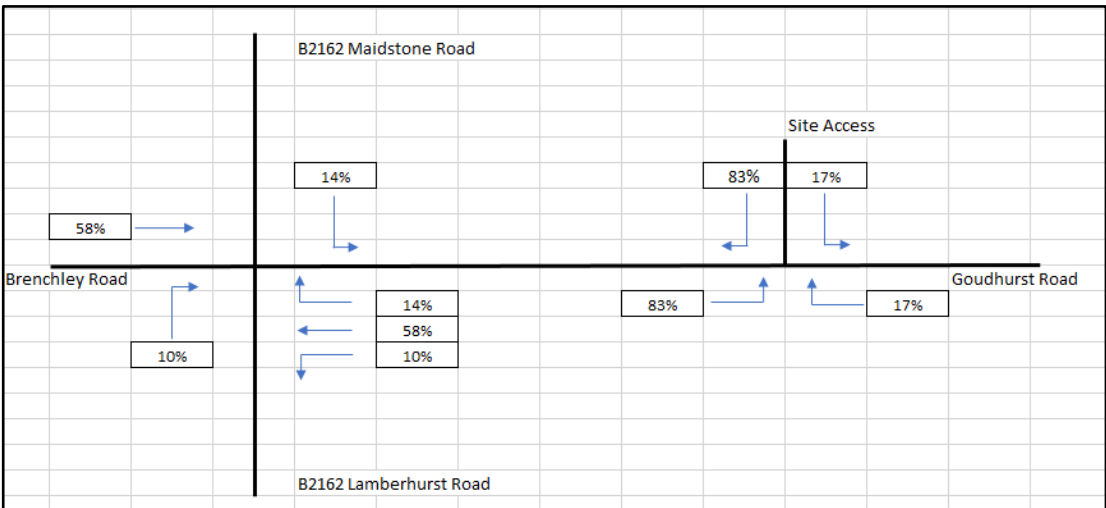


Figure 4.1 – Peak Hour Trip Distribution %

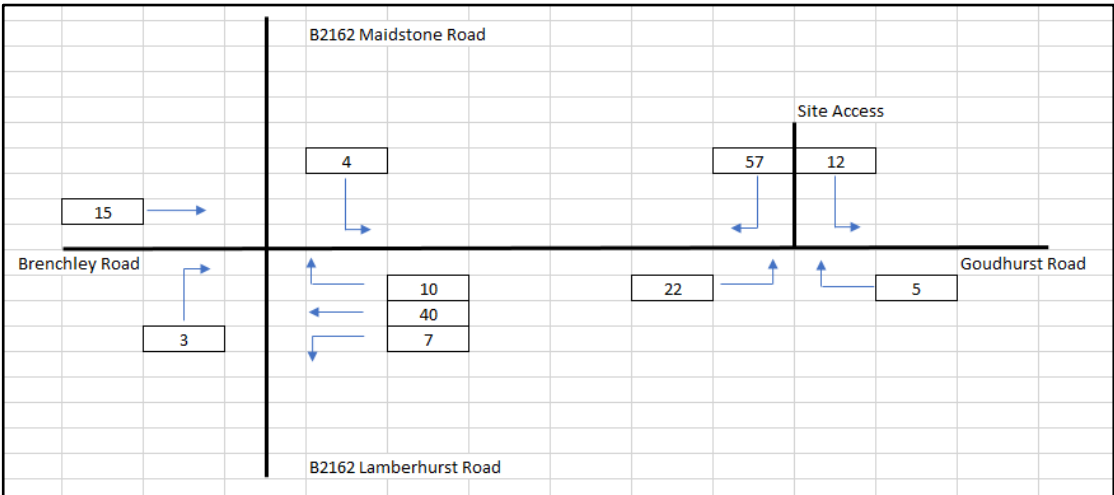


Figure 4.2 – AM Peak Hour Trip Distribution

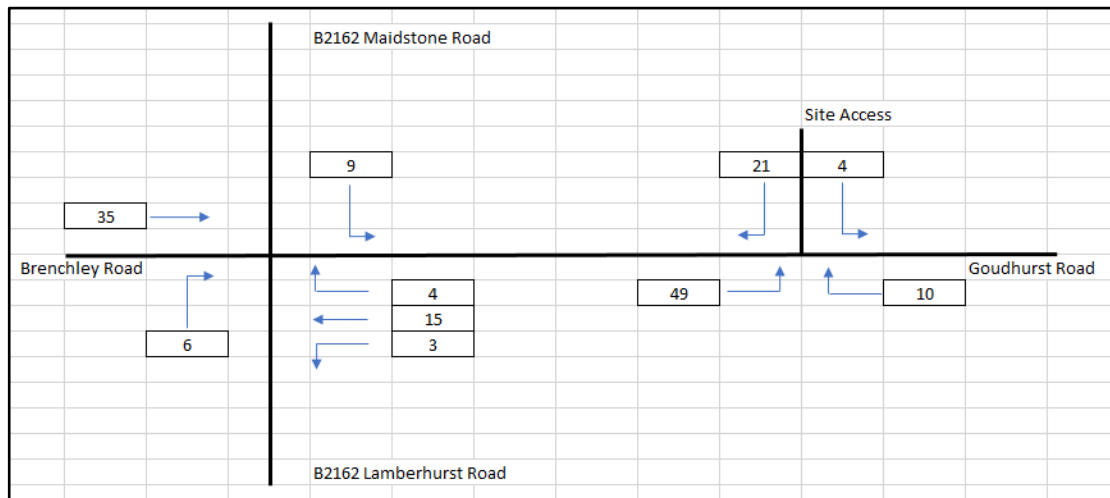


Figure 4.3 – PM Peak Hour Trip Distribution

- 4.8 Reviewing **Figures 4.2** and **4.3**, it can be seen that the development proposals are not anticipated to result in a material change in traffic flows, with an average of less than 1 additional vehicle per minute during each of the peak hours on the dominant arm of the junction.
- 4.9 These development flows have been compared with the observed traffic flows recorded within the ATC undertaken in October 2019, detailed below in **Table 4.1**.

TABLE 4.1: GOUDHURST ROAD, WEST OF SITE ACCESS % CHANGE IN TRAFFIC

Time Period	Direction	Observed Traffic Flow	Development Traffic Flow	Total Traffic Flow	% Change
Weekday AM Peak	Eastbound	119	22	141	18%
	Westbound	256	57	313	22%
	Total	375	79	454	21%
Weekday PM Peak	Eastbound	332	49	381	15%
	Westbound	159	21	180	13%
	Total	491	70	561	14%
Weekday 07.00-19.00	Eastbound	1757	337	2094	19%
	Westbound	1667	342	2009	21%
	Total	3424	679	4103	20%

- 4.10 **Table 4.1** therefore confirms that the development impact relative to the already low vehicle flows is modest, with a maximum increase totalling 22% on westbound traffic during the AM peak.

Transport Evidence Base

- 4.11 A Transport Assessment Report has been prepared on behalf of TWDC, acting as evidence base for the Draft Local Plan, which has assessed the cumulative impacts of the preferred growth strategy on the transport infrastructure and measures to mitigate this impact and promote sustainable travel.
- 4.12 A review of the document suggests no major interventions are suggested locally in terms of delivering additional highway capacity to support the envisaged growth within Horsmonden and indeed the document includes capacity analysis undertaken at the Maidstone Road crossroads junction with Goudhurst Road (junction reference 63), which reveals junction capacity performance under future year scenarios with the allocated growth in place of below 80% and link capacity on the approach roads, including Goudhurst Road, below 80%, with extract below in **Figure 4.4**, inferring capacity within the immediate local highway network to accommodate the development.

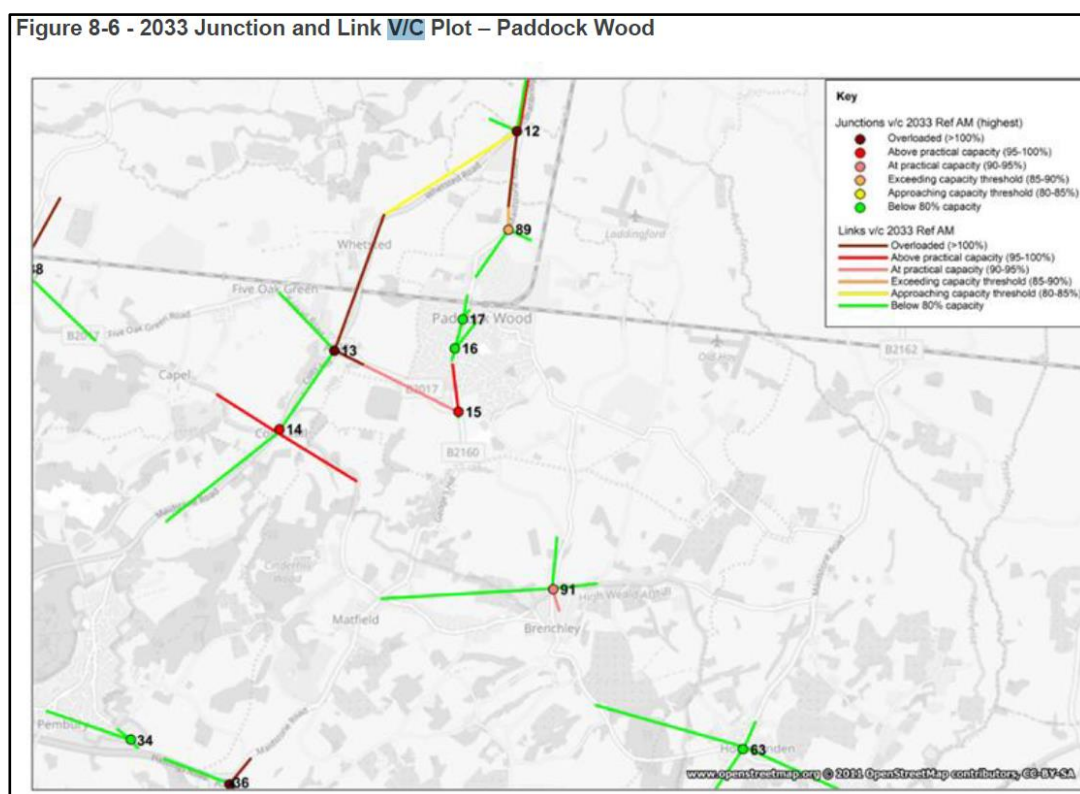


Figure 4.4 – Draft Local Plan Transport Evidence Base Capacity Assessment

Site Access Capacity Assessment

- 4.13 The capacity of the proposed site access junction has been assessed using the industry standard software for assessing priority junctions, PICADY, in order to demonstrate that it will have no material capacity implications on the Goudhurst Road through traffic.
- 4.14 Geometric inputs have been taken from OS mapping, with the assumption made that any right turn traffic into the site would block ahead movements, which have been taken from the aforementioned ATC surveys.
- 4.15 **Table 4.2** below, summarises the results of this PICADY analysis in terms of queue, delay and ratio of flow to capacity (RFC). An RFC of 0.85 indicates that the junction is operating close to capacity.

TABLE 4.2: JUNCTION CAPACITY PICADY ASSESSMENT RESULTS

Simple Priority Junction								
Arm	AM Peak				PM Peak			
	Queue	Delay (s)	RFC	LOS	Queue	Delay (s)	RFC	LOS
Access	0.2	10.3	0.18	B	0.1	10.35	0.07	B
Goudhurst Road	0.0	5.01	0.01	A	0.0	5.78	0.02	A

- 4.16 **Table 4.2** therefore confirms that the site access is anticipated to operate well within capacity. Furthermore, the results of the analysis suggest there is reserve capacity to accommodate the impact associated with future years, where baseline traffic flows may increase, and additional traffic associated with other committed development can be taken into account, undertaken as part of subsequent off-site traffic impact analysis.

5. Policy and Guidance Compliance

Introduction

- 5.1 It is assumed that TWDC's emerging Local Plan will be adopted at the time of submission of a planning application. This section of the Transport Appraisal therefore reviews relevant transport related planning policy, demonstrating how the development proposals will comply.
- 5.2 It is acknowledged that the Local Plan will also be supported by an updated Borough Transport Strategy, with the current version covering the period 2015 to 2026.
- 5.3 The Transport Appraisal also references relevant guidance documentation that will inform the proposed site layout, such as the Kent Design Guide.

Draft Local Plan

- 5.4 The DLP acknowledges the challenges and opportunities faced by the borough.
- 5.5 With regards to transport and the site, the DLP states:

It is also important to consider transport issues in the wider rural area, as they are very different from those in the urban area. Public transport coverage is poorer in the rural towns and villages. With a much smaller range of services and fewer local employment opportunities, local residents must travel further, and often these journeys are undertaken by car. While it is recognised that the car will remain the dominant mode of transport for residents of much of the borough, the Local Plan must encourage and promote the uptake of active and sustainable transport where possible.

- 5.6 The DLP includes a number of Visions and Objectives (V&O1), with key references including:

V&O1. At the heart of all development in the borough will be connectivity, active travel, an appropriate mix of uses and accommodation and, above all, the timely delivery of relevant infrastructure, which will have been funded by development: this infrastructure will have mitigated the impact of development, and, wherever possible, resulted in 'betterment' for existing residents, users, businesses, visitors, etc.

V&O2. 3. To prioritise active travel, but where necessary to plan appropriate for use by private motor vehicle, in particular embracing new technology.

- 5.7 Strategic Policy 6 – *Transport and Parking*, states that development should occur within close proximity to accessible locations of existing settlements to help reduce the need to travel, with active travel and public transport prioritised as an alternative to the private car, with electric vehicles promoted to reduce harmful vehicle emissions. The policy requires developments to include electric charging, support cycling and walking strategies, support demand responsive travel and enhanced bus services and pursue improvements to transport links in rural areas.

- 5.8 Policy STR/HO1, *The Strategy for Horsmonden Parish*, states that development proposals should maintain and enhance public rights of way or local strategic cycle network and provide public electric vehicle charging points and car shared facilities.
- 5.9 Policy EN1 – *Design and other development management criteria*, requires all developments to provide safe vehicular access, parking provision and pedestrian movement and should not result in a material change in traffic that would harm the safety of the local highway network. Developments should provide cycle parking in accordance with relevant standards and car parking and servicing requirements should not dominate the street scene and public realm. New layouts should also be inclusive and accessible to all abilities and new technologies such as broadband and electric car charging should be supported.
- 5.10 Policy EN2 – *Sustainable Design and Construction*, includes a number of steps that should be followed to demonstrate sustainable development, two of which relate to transport under a topic heading of Site Location and Layout. Step 1 requires development to be prioritised in locations with frequent and easily accessible public transport services that provide useful links to infrastructure such as surgeries, train stations, shopping areas and schools, with public transport services to be enhanced where necessary via contributions. Step 2 requires development to be prioritized in locations that encourage active travel to such facilities, with enhanced facilities provided where necessary.
- 5.11 Policy TP1 – *Transport Assessments, Travel Plans and Mitigation*, states that such documents should be produced for developments in excess of 10 dwellings. Transport Assessments must then demonstrate the impact of the development and how this can be mitigated to prevent significant residual impacts, which may include contributions that are fairly and reasonably related to this impact.
- 5.12 Policy TP2 – *Transport Design and Accessibility*, requires development to be:
- Accessible to all user groups and abilities, with servicing demands informed by vehicle swept path analysis;
 - Within reasonable proximity of public transport services and infrastructure;
 - Enhance or maintain cycle route infrastructure and the PROW network;
 - Designed in accordance with Manual for Streets and incorporating speed reduction measures, with specific requirements concerning shared space; and
 - Include car share facilities if appropriate, cycle storage provision and electric charging infrastructure.
- 5.13 Policy TP3 - *Parking Standards*, identifies required parking space dimensions, including for light goods vehicles, garage sizes and the acceptable form of car parking. The policy also includes minimum car parking standards for residential developments, which for houses are:
- 1.5 spaces per 2 bed house

- 2 spaces per 3 bed house
- 2.5 spaces per 4+ bed house
- 0.2 spaces per unit for visitor parking.
- 1 cycle parking space per bedroom, within the curtilage of the property.

5.14 *Policy TP5 – Safeguarding Railway Land*, states that proposals that would compromise the protected route of the Former Paddock Wood to Hawkhurst (Hop Pickers) Line, will be resisted.

Transport Evidence Base

5.15 The Transport Assessment Report prepared to inform the DLP, referenced above, references the potential for development to support increased bus frequencies to destinations such as Paddock Wood, potentially through the introduction of Demand Responsive services. The document acknowledges that the proposed Hop Pickers route would offer a key link to Paddock Wood and that the distance of 5km is cyclable to access potential employment, education, retail and rail connections.

Kent Design Guide

5.16 The Kent Design Guide details that for a development of between 50 and 300 dwellings, it should be served by a 5.5m wide Major Access Road, with a design speed of 25mph, visibility requirements of 45m and supported by 1.8m wide footways.

5.17 Major Access Roads can then provide access to 4.8m wide Minor Access Roads, which generally serve up to 100 dwellings as a through route or 50 dwellings as a cul-de-sac, or 4.1m wide Minor Access Ways.

Policy Compliance

5.18 The development proposals will comply with planning policy given the fact that, despite being within a relatively rural location, the site is within close proximity of a range of social infrastructure that ensures future residents are not wholly reliant on travel by car, with land uses such as a primary school, health care provision, convenience retail and local public houses and places of worship all being within an acceptable walking distance.

5.19 The proposed site layout will be designed in accordance with relevant design guides, with a layout that will be accessible to all user groups, including delivery and servicing vehicles and car and cycle parking provision that meets the relevant design guides, supported by infrastructure such as electric charging.

5.20 The development is located adjacent to the proposed Hop Picker route, but in no way precludes its delivery and indeed will allow connections with the facility should it come forward in the future. The development will not preclude established PROW and will indeed improve alignments and surfaces within its site boundary.

- 5.21 The development will generate additional demand for public bus services, making existing services more financially viable and likely generating sufficient capital for contributions to be provided to at least improve peak hour services or create a market for a demand responsive service.
- 5.22 Traffic impact analysis undertaken in support of the Draft Local Plan also suggests that significant interventions in terms of highway capacity are not required within the immediate highway network to accommodate the proposed scale of development.
- 5.23 On this basis, the principle of this scale of development within this location is considered to be in accordance with draft planning policies.

6. Summary and Conclusion

- 6.1 In Summary, this Transport Appraisal has been prepared in support of Persimmon Homes South East emerging development proposals for land on the eastern edge of the village of Horsmonden.
- 6.2 Part of the site is identified within Tunbridge Wells District Council's Draft Local Plan as a potential development site allocation for residential development (Policy AL/HO3).
- 6.3 Part of the site benefits from planning approval for a residential development totalling 30 units (under planning permission TW/15/505340/OUT).
- 6.4 Persimmon Homes South East have confirmed that the site has capacity to accommodate 175 residential dwellings.
- 6.5 The extant planning permission has established the principle and design requirements for vehicular and pedestrian access from Goudhurst Road, which the current development proposals will continue to adopt. The development proposals will also include additional pedestrian access via the established public right of way network that runs north of the site via Back Lane.
- 6.6 The Transport Appraisal has established that the site is an appropriate place for residential development, benefiting from being located within close proximity of a range of social infrastructure within the village that acts as typical trip attractors for residential land uses, ensuring residents are not wholly reliant on travel by private car to access essential services such as primary education, health and convenience retail.
- 6.7 Horsmonden also benefits from being served by a number of existing bus services that provide access to higher order settlements such as Royal Tunbridge Wells and Paddocks Wood, from which there are opportunities to access National Rail services.
- 6.8 The transport appraisal has undertaken a trip generation exercise and demonstrated that the development proposals are not anticipated to result in a significant increase in traffic levels, against an existing local highway network that Draft Local Plan evidence suggests operates within capacity anyway. The proposed site access junction has also been demonstrated to operate within capacity, with no material impacts on through traffic on Goudhurst Road.
- 6.9 The development proposals will be designed in accordance with Manual for Streets and Kent Design Guide principles, future proofing connections with proposed infrastructure such as the Hop Pickers route to Paddock Wood, which runs adjacent to the site, and which will offer convenient and safe cycle access on traffic free routes.
- 6.10 The development proposals will also support and encourage sustainable travel via the implementation of a Travel Plan and is of a scale of development that will potentially be able to deliver improved public bus services and/or the creation of a demand responsive bus service that is branded to the site.

- 6.11 The Transport Appraisal has reviewed emerging transport related planning policy within the Draft Local Plan and concluded that residential development of the envisaged scale at this site would be in compliance.
- 6.12 On this basis, Markides Associates are of the view that the site can support a sustainable residential development, resulting in improved infrastructure that will offer betterment for existing residents within Horsmonden.
- 6.13 Any future planning application would be supported by a Transport Assessment, the scope of which would be agreed with Kent County Council, where detailed designs and off-site traffic impacts and mitigation requirements would be established.

FIGURES AND DRAWINGS

ALL FIGURES INCLUDED WITHIN BODY OF REPORT

FIGURE 1.1 – SITE LOCATION PLAN

FIGURE 2.1 – SOCIAL INFRASTRUCTURE

FIGURE 2.2 – PUBLIC RIGHTS OF WAY NETWORK

FIGURE 2.3 – HOP PICKER ROUTE

FIGURE 2.4 – PUBLIC TRANSPORT

FIGURE 3.1 - POTENTIAL TRANSPORT IMPROVEMENTS

FIGURE 4.1 – DEVELOPMENT TRAFFIC DISTRIBUTION (WITHIN TEXT)

FIGURE 4.2 – AM PEAK DEVELOPMENT TRAFFIC (WITHIN TEXT)

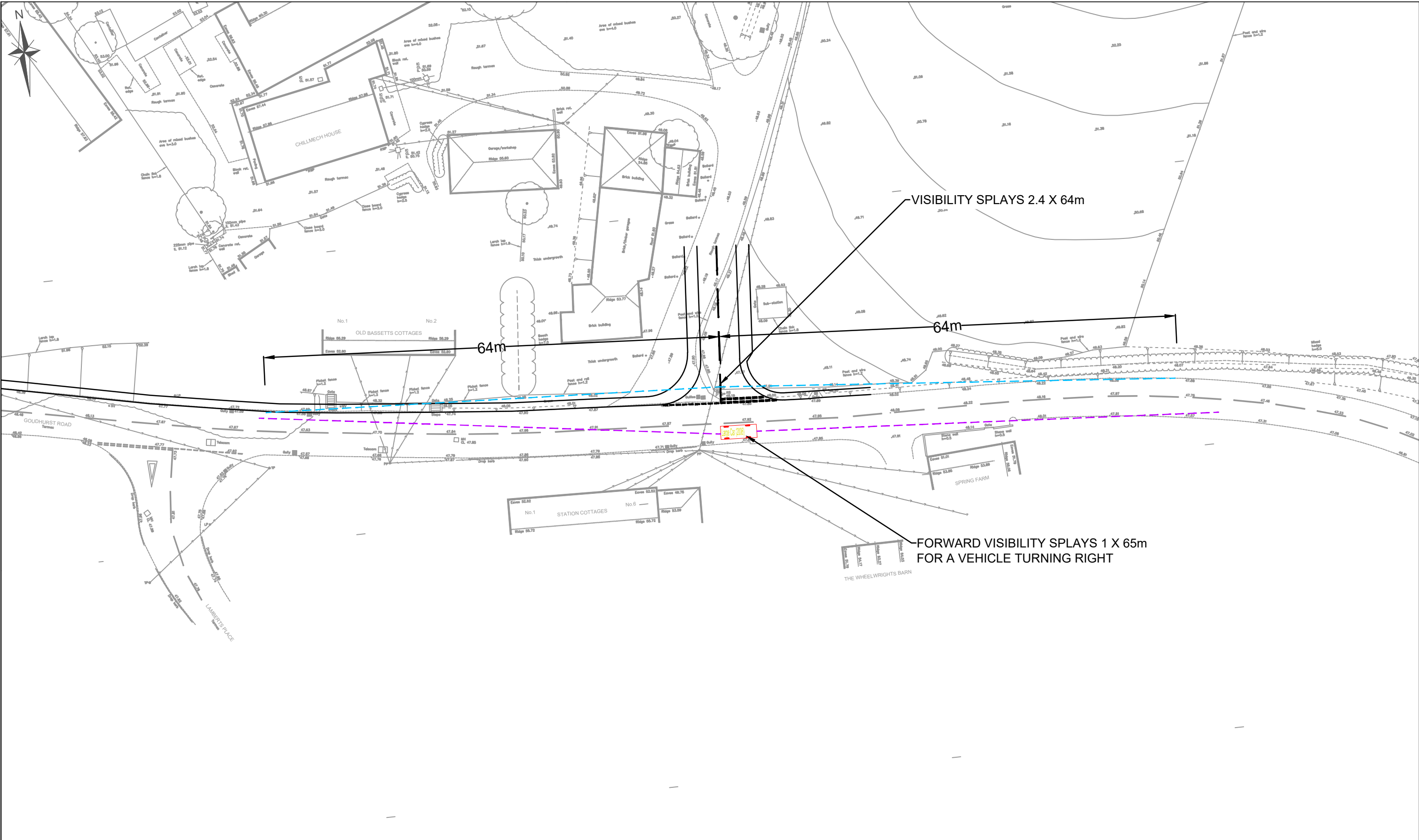
FIGURE 4.3 – PM PEAK DEVELOPMENT TRAFFIC (WITHIN TEXT)

FIGURE 4.4 – DRAFT LOCAL PLAN TRANSPORT EVIDENCE BASE CAPACITY ASSESSMENT (WITHIN TEXT)


Drawings

19242-01-001 – GOUDHURST ROAD PROPOSED FOOTWAY

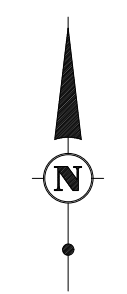
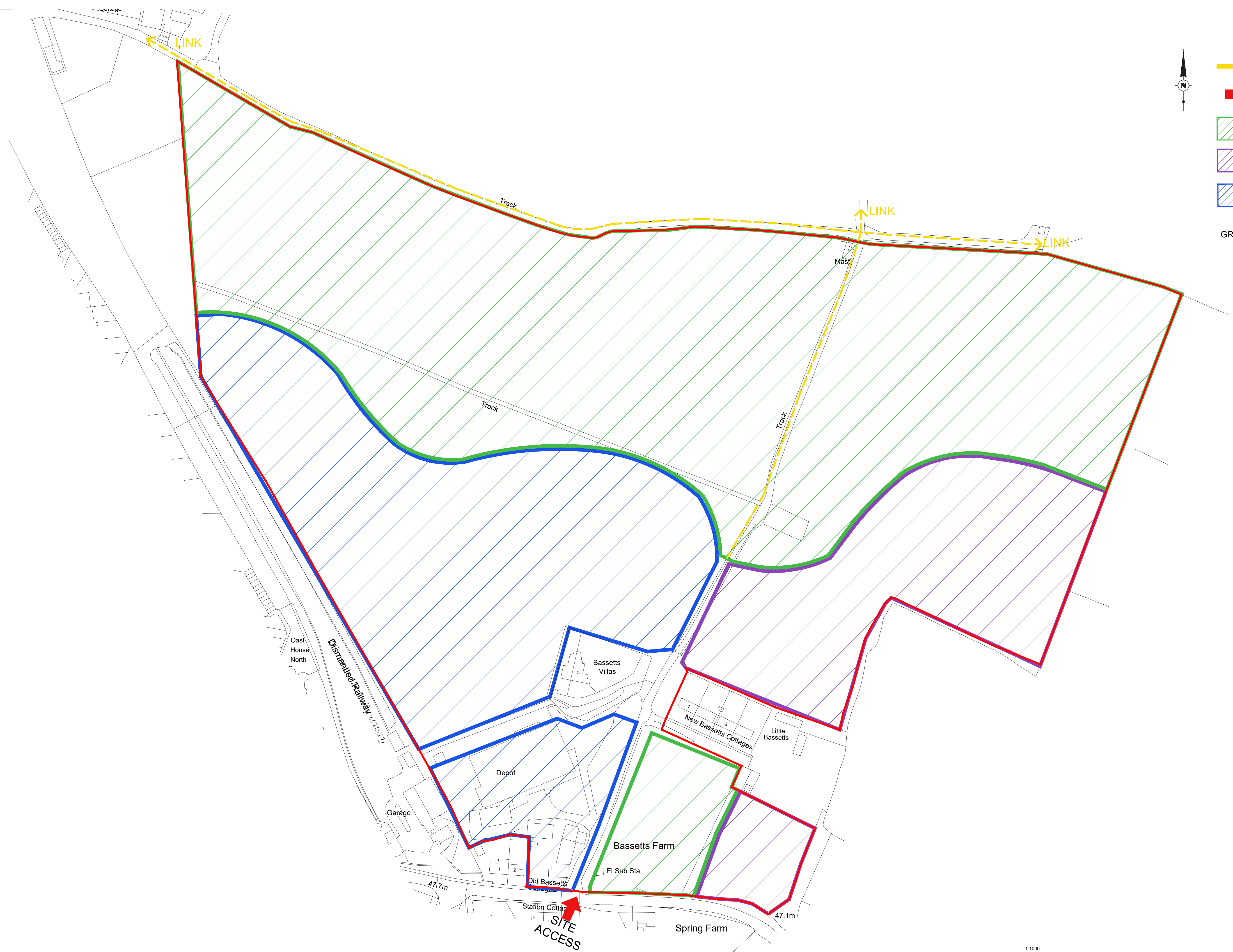
19242-01-002 – GOUDHURST ROAD PROPOSED SITE ACCESS


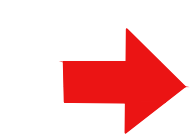
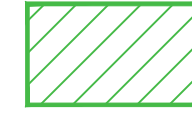




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		Drawing Title	VISIBILITY SPLAYS			Drawn	CDT	Checked	AS	Approved		AS
						Job No	19242-01	Drawing No		19242-01-002		Rev

APPENDIX A – PARAMETER PLAN

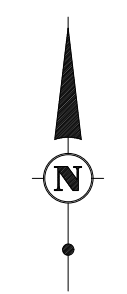
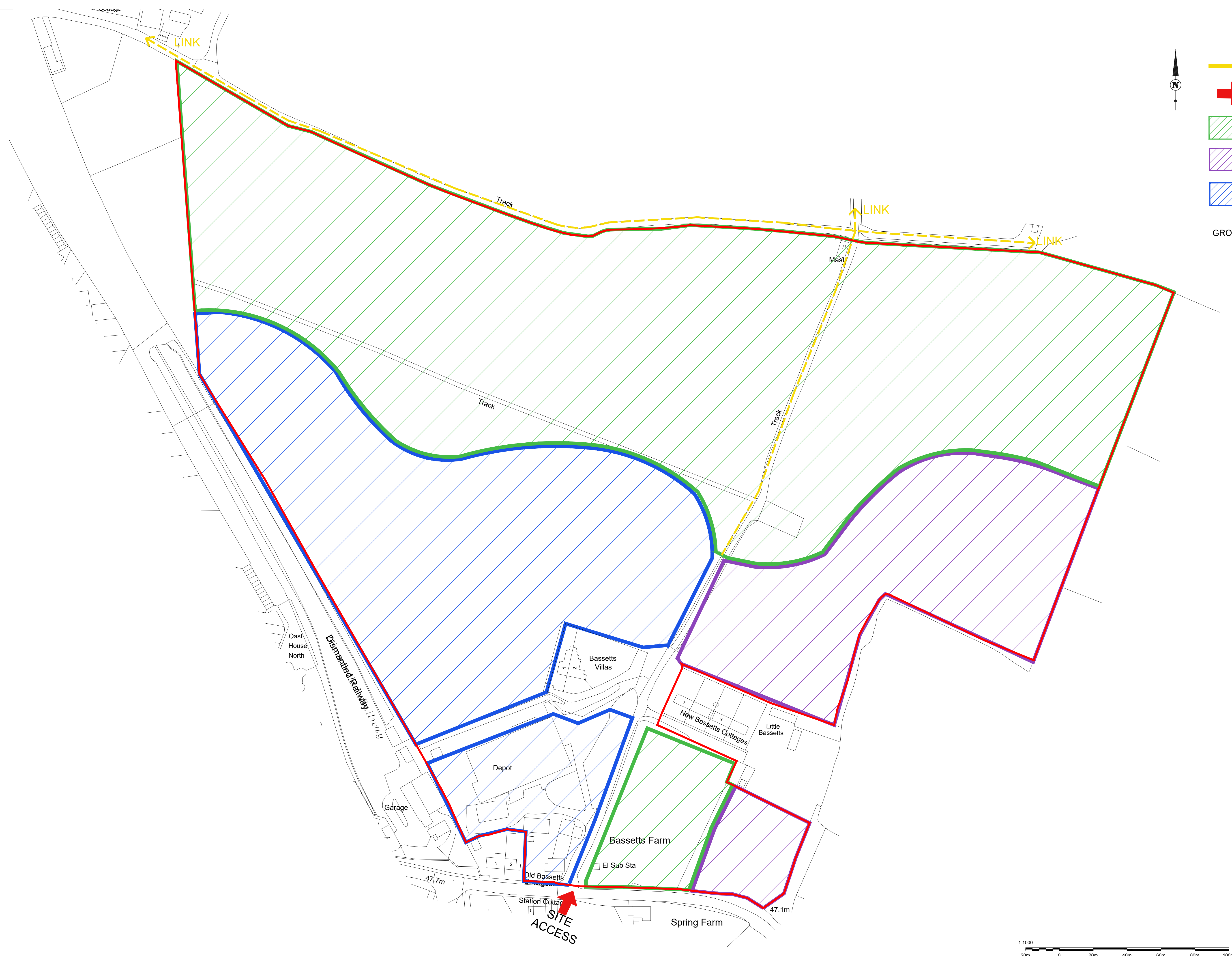



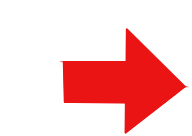
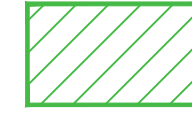


-  PUBLIC RIGHT OF WAY
-  SITE ACCESS
-  PUBLIC SPACE -
22.36 ACRES (9.04 Hectares)
-  LOW DENSITY -
5.63 ACRES (2.27 Hectares)
-  HIGH DENSITY -
10.74 ACRES (4.34 Hectares)
- GROSS - 38.73 ACRES (15.67 Hectares)




Rev.	Date	Amendment	By	Chk.
Status		Planning		
<div> PERSIMMON Together we make a home</div>				
Job	HORSMONDEN, BASSETTS FARM.			
Title				
Parameter Plan				
Drawn By	SW	Date	Jan '18	
Check	-	Scale	1/1000	
		@ A1		
Drawing No.				
634-PP-001				

APPENDIX 3 – PARAMETERS PLAN



-  PUBLIC RIGHT OF WAY
-  SITE ACCESS
-  PUBLIC SPACE -
22.36 ACRES (9.04 Hectares)
-  LOW DENSITY -
5.63 ACRES (2.27 Hectares)
-  HIGH DENSITY -
10.74 ACRES (4.34 Hectares)
- GROSS - 38.73 ACRES (15.67 Hectares)



Rev.	Date	Amendment	By	Chk.
Status		Planning		
<div>PERSIMMON Together we make a home</div>				
Job	HORSMONDEN, BASSETTS FARM.			
Title				
Parameter Plan				
Drawn By	SW	Date	Jan '18	
Check	-	Scale	1/1000	
		@ A1		
Drawing No.				
634-PP-001				