

**Landscape Character Assessment SPD
Consultation Responses
2 May to 12 June 2017**

ID	Name/Organisation	Response	TWBC Response	TWBC Recommendation
LCA 1	Hawkhurst Parish Council	<p><i>Hawkhurst Parish Council 11th April 2017.</i></p> <p><i>TUNBRIDGE WELLS BOROUGH LANDSCAPE CHARACTER ASSESSMENT 2017 (LUC, February 2017): a response to those parts of the document dealing with Hawkhurst and the surrounding area.</i></p> <p>The 'Landscape character assessment' (hereafter 'the document') includes sections dealing with 'Borough Landscape Character Overview', 'User Guide', 'Landscape Objectives, Detractors, Changes and Opportunities' and 'Landscape Character Area Assessments'. Maps and illustrations are provided throughout the document; there is a preface that sets out its history and lists the 2017 revisions.</p> <p>Despite often-questionable grammar, the document is clearly written. The document 'updates all maps and photographs' (preface) but the maps in particular often seem to be low-resolution and too small to give any significant detail (magnification of the online document only results in increasing pixelisation). Updating of one Hawkhurst picture is certainly needed (see below). Despite these reservations, the document as a whole adequately reflects its title and stated purpose.</p> <p>The following comments refer specifically to Hawkhurst and Section 4 of the document.</p> <p>1) Fig. LCA 11 purports to show 'Hawkhurst wooded farmland'. The reader is referred to 'Fig. 1' earlier in the document, which is a generalised map, but LCA 11 does not add any clarity to this. Perhaps it is only meant to show the extremities of a general area of wooded farmland (and should therefore state this) but, to give one</p>	<p><i>Image quality has been sacrificed to reduce file size. This is a constant issue for these types of planning documents.</i></p> <p><i>1) Wood Farmland is the character type see figure 1 and table 4-1 page 25. There are seven areas that are of this type e.g. Speldhurst wooded farmland. Hawkhurst Wooded Farmland refers to the character of</i></p>	<p><i>Ensure that final web version maps are clear and if not provide them separately.</i></p>

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		<p>example, the centre of Hawkhurst is hardly 'wooded'.</p> <p>2) The photo of the <i>Colonnade</i> (p. 101) is black and white while the remaining photos are coloured. It also appears to show a snow scene on a particularly dark and stormy day. It also gives the impression that the <i>Colonnade</i> is built on a curve. While all this may be seen as an artistic impression, it is out of place in a descriptive document. There are plenty of superior photos of the <i>Colonnade</i> that are readily available including those taken by Cllr John Hunt in advance of the NDP inspection.</p> <p>3) P. 102, add 'those' to 'such as [those] between Sandhurst and Hawkhurst' (§ 2).</p> <p>4) P. 102 § 3: Whites Wood, Whites Lane is on Forestry Commission England's map for Bedgebury Forest & Hemsted, the map "indicates location of ancient woodland as held in the Natural England Ancient Woodland Inventory Dataset" and clearly shows Whites Wood. Whites Wood should therefore be included here. Also § 3, and later: perhaps the more generally accepted 'Tongswood' would be better?</p> <p>5) P. 103, 'Evidence of Past Use ...': is Section I mis-placed?</p> <p>6) P. 104, 'Natural Landscape ...': the number of naturally occurring paths and springs throughout the area of Hawkhurst should be mentioned here, even if only in general terms.</p> <p>7) P. 105, § 6: for the non-specialist reader, there needs to be a definition of 'dark skies'. There is also no mention of the need to</p>	<p><i>the identified area and not the parish or village.</i></p> <p>2)Agreed</p> <p>3)Agreed</p> <p>4)Agreed</p> <p>5)No – <i>its just unfortunate that it goes over the page.</i></p> <p>6)Agreed</p> <p>7)Agreed – <i>definition needed but policy is covered by item 8) page</i></p>	<p>1)No Change</p> <p>2)Change photo of <i>Colonnade</i></p> <p>3)Page 102 Characteristic 2) last sentence - add 'those' to 'such as [those] between Sandhurst and Hawkhurst' .</p> <p>4)Page 102 Characteristic 3) last sentence – add Whites Wood and change Tongs Wood to Tongwood.</p> <p>5)No action</p> <p>6)Add reference to numerous springs on page 104</p> <p>7)Add definition of dark skies to</p>

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		<p>assist the 'dark skies' concept by sensitive street lighting.</p> <p>8) P. 105, 'Detractors and Opportunities' § 2: it should be added that 'production-line' housing is to be avoided. Weather-boarded houses are an important part of the area's 'vernacular heritage' (§ 3). The document should not include this form of construction under 'low quality (sic) materials' without qualification. While plastic weatherboarding may not be acceptable, good-quality wooden boarding may enhance the vernacular heritage.</p> <p>9) P. 105 § 3: given the problems associated with the traffic lights in the middle of Hawkhurst, the A229 should surely be mentioned in conjunction with the A268? The reference to 'Landscape Strategy' under 'appropriate planning' is to be welcomed as is 'new development [being] appropriate in scale'. Both these fully support the Hawkhurst NDP.</p> <p>10) § 5: the Hawkhurst line was but one of a number in Kent and East Sussex known locally as 'Hop-pickers' lines'.</p> <p>11) P. 132 'Valued Features ...' §§ 2 & 6 are particularly welcome.</p> <p>12) P. 133, 'Landscape Strategy' in Bedgebury § 6: the only development in Bedgebury should be for the maintenance of habitat or for the needs of the forest and forestry.</p> <p>April 2017, on behalf of the Land Committee, Hawkhurst Parish Council.</p>	<p>24/4 (Note numbering has gone wrong here and will be corrected)</p> <p>8) Reference to "production line housing" noted but that is a matter best dealt with elsewhere. Point on weather boarding noted and agreed it needs clarification.</p> <p>9)Agreed</p> <p>10)Suggestion of reference to railway line noted but that ended at Gills Green which is outside the character area.</p> <p>11) Noted</p> <p>12)Noted but this document cannot create new policies of that nature.</p>	<p>Glossary.</p> <p>8) Page 105 Detractors and opportunities insert 'plastic' before weatherboarding'.</p> <p>9)add reference to A229 alongside A268</p> <p>10) No change</p> <p>11) No change</p> <p>12) No change</p>

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LCA 2	Horsmonden Parish Council	<p>The document makes a point about maintaining the character of orchards and applying for grants to keep orchards, without necessarily relating this to any horticultural business, which is idealistic rather than realistic.</p> <p>The document also mentions a possible restriction of converting agricultural buildings, and appeared not to be in favour of allowing new agricultural buildings. Again it was felt that this was unsustainable as a lot of older agricultural buildings are no longer fit for purpose for modern agricultural practices.</p>	<p><i>These issues are covered on page 5 in section 3.4 and 3.5 and points 11 to 15. There is no policy to restrict new agricultural buildings but there is a suggestion that existing suitable agricultural buildings are retained for agricultural use.</i></p>	<p>No change</p>
LCA 3	RTW Town Forum (Strategic Planning Working Group)	<p><u>Introduction</u></p> <p>Formed in 2005, the Town Forum is the voice of 50,000 residents in the unparished area of Royal Tunbridge Wells. This response deals with the Landscape Character Assessments draft primarily to the extent that it raises issues concerning the town and its immediate surroundings.</p> <p>Three of the Landscape Character Areas assessed in the draft Borough Landscape Character Assessment 2017 about the town. These are Pembury Forested Plateau, Bayhall Open Farmland and Speldhurst Wooded Farmland.</p> <p><u>Our submission to the 2016 consultation</u></p> <p>We responded to the earlier Landscape Character Assessments consultation in 2016 setting out the following conclusions:</p> <p>1. The strong sense of place associated with Royal Tunbridge Wells should be safeguarded by protecting the landscape setting of the Areas of Outstanding Natural Beauty surrounding the town and conserving the buffer areas of high quality Green Belt on its edge which feather imperceptibly into it, thus maintaining the high visual,</p>	<p><i>Comments noted</i></p>	

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		<p>amenity and cultural value of our landscapes. These contribute to the economic health of the town and help produce benefits of greater social cohesion through community activities, charitable events and outdoor sports in general.</p> <p>2. This safeguarding should be done through the planning system and also by further developing appropriate leisure and tourist activities related to our adjacent open countryside which allows walking, cycling, fishing, horse riding, rock climbing and outdoor pursuits in general.</p> <p>3. The resource represented by these green spaces is not only valuable for residents. It can also be of benefit to tourists, potentially extending the length of their stay in the town, with consequent economic benefits for the local economy.</p> <p>4. With open countryside or woodland within 15 minutes walk of nearly all inhabitants of the town, the health and amenity “green value per resident” of adjoining countryside acres may be considered much greater in the town of Royal Tunbridge Wells than in many other parts of the Borough and merits future safeguarding.</p> <p>5. Opportunities may arise for acquisition and safeguarding of green spaces by the Woodland Trust, National Trust or designation by landowners and by local subscription and such opportunities should be actively pursued whenever they arise.</p> <p><i>The following views and landscapes are considered to be in need of permanent safeguarding:-</i></p> <ul style="list-style-type: none"> • The view across the AONB to the horizon from Dunorlan Park. (<i>Bayhall open farmland</i>) • The view from the Beacon Hotel across Happy Valley (<i>Speldhurst wooded farmland</i>) 	<p><i>Comments noted</i></p> <p><i>Comments noted</i></p> <p><i>Comments noted</i></p> <p><i>Comments noted</i></p>	<p style="text-align: center;"><u>1</u></p>

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		<ul style="list-style-type: none"> • High Wood Hawkenbury and its surrounding AONB. (<i>Bayhall open farmland</i>) • The view from Speldurst Road through to the escarpment above Smockham Farm and Rusthall to the south and Salomons Estate to the west and, in between, the area bounded by Reynolds Lane and Broomhill Road. (<i>Speldhurst wooded farmland</i>) • The view from the end of Pembury Road towards Pembury Grange. (<i>Pembury woodlands and heathland</i>) • The view from Hungershall and Nevill Parks of the meadows that separate them. (<i>Speldhurst wooded farmland</i>) • The view of the AONB valley and Forge and Nightingale farms from the Tonbridge-Tunbridge Wells railway line which constitutes probably the most visually important landscape approach to RTW, setting the town in its surviving rural context for those arriving by rail. (<i>Pembury woodlands and heathland/Speldhurst wooded farmland</i>) <p><u>General comments on the draft TWB Landscape Character Assessment 2017</u></p> <p>The draft Assessment is an extremely well documented and presented document which illustrates the value of many of the landscapes which presently merge with the town on its outskirts and merit continued protection. It will provide an excellent long term reference document on historic evolution of the landscapes, their valued features and qualities, detractors, changes and opportunities.</p> <p>Positive features include the references in paragraph:</p> <p>3.3.4 to securing legal agreements or conditions for long term conservation and management of retained features,</p> <p>3.3.7 to controlling or resisting loss of a sense of remoteness</p>	<p><i>Comments noted – the document does not propose to identify all protected views. Both Plan Making and Development Management will take account of views for particular sites/locations.</i></p> <p><i>Views and the setting of Tunbridge Wells are mentioned in area 5 page 59-60 in item 13 and again on page 62 item 6.</i></p> <p><i>Views from Dunorlan are mentioned in Area 19 page 157 item 6 and from the High Weald Landscape Trail on page 158 item 6.</i></p>	<p>No Change</p>

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		<p>Speldhurst Wooded Farmland is nearly three times the size.</p> <p>The discussion of individual farmsteads and woods in relation to Bayhall is comprehensive and admirably detailed but this is a smaller and relatively straightforward area where there is no need also to discuss any individual settlement settings. The Speldhurst area is much more complex as it also has to cover the Tunbridge Wells and Rusthall Commons, historic Speldhurst and Bidborough. There is therefore less specific coverage and reference to individual features and farmsteads and this is particularly noticeable in the skimpier treatment of the mediaeval assart and early modern field patterns and unimproved pasture on the eastern side of RTW/Southborough at Nightingale and Honnington farms (mentioned in our 2016 response) and on the western side at Smockham and Caenwood farms (also mentioned in 2016). In that regard we would refer you to the excellent draft Historic Landscape Characterisation: Summary of the Town of Royal Tunbridge Wells: August 2016 some details of which could usefully be incorporated in the Landscape Character Assessment. Besides their historic significance, both these specific areas form important landscape views on the edge of the town and appear currently vulnerable to development pressures.</p>	<p><i>There is always a difficult choice to make about presentation and content with such documents and any number of ways of presenting such information. This assessment is broadly based on the format of the previous document which seemed to work well.</i></p> <p><i>It is agreed that the geographical extent of a Character Area is not always reflected in page numbers but it should also be recognised that extent of area does not necessarily equate to interest. The areas vary from 6 to 9 pages with two always given to map and photos so that text varies from 4 to 7 which is quite a large variation. Speldhurst is particularly mentioned and this is the area which has most pages, 9.</i></p> <p><i>The whole document has been reviewed by the author of the HLC and suggested changes from that review have been considered.</i></p>	<p>No Change</p>
LCA 4	Culverden Residents' Association	<p>The Culverden Residents' Association has 66 members living in Culverden Park Road, Culverden Park, Culverden Avenue, Campbell Road, Reynolds' Lane and parts of Culverden Down. This response deals with the Landscape Character Assessments draft insofar as it raises issues concerning the town of Royal Tunbridge Wells and our immediate surroundings. We are situated in the Landscape Area</p>		

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		<p>population.</p> <p>We are concerned though that the apparent underlying assumption seems to be that landscapes in the Borough are inevitably liable to undergo substantial future change and that this may at best be mitigated rather than refused. We hope that suitable weight will be given to the draft in identifying legitimate constraints to a possible policy of suburbanising sprawl to which our local landscapes may otherwise become subject.</p> <p><u>Specific comments in relation to the Speldhurst Wooded Farmland character area</u></p> <p>This is a very large area and we feel that our part of it has not been discussed in as much depth as has been the case for the land near Tunbridge Wells in the Bayhall Open Farmland area which seems more comprehensive in its treatment. In this respect we would draw your attention to the significant data contained in the Historic Landscape Characterisation 2016 (Summary of the town of Royal Tunbridge Wells) which <i>does</i> cover the area discussed below as a pre-medieval, medieval and early modern landscape which was mostly in its present form well prior to the founding of Royal Tunbridge Wells as a settlement.</p> <p>The landscape area bounded by Hurst Wood, Smockham and Caenwood Farms, Speldhurst Road, Reynolds Lane and Culverden Down/Park is one of the most ancient in our part of the High Weald. It bears witness to agricultural use going back to Anglo Saxon times through the place name “Culverden” meaning the “Den” (area of woodland for autumn transhumant pigs) under the cliff (referring to our many rock outcrops). This Den was later assarted into small fields and remaining woodland. The place name “Hurst”, meaning a wood, also bears witness to the ancient origins of Hurst Wood.</p>	<p><i>Noted. The document once adopted will be a material consideration for any planning application.</i></p> <p><i>It is agreed that the geographical extent of a Character Area is not always reflected in page numbers but it should also be recognised that extent of area does not necessarily equate to interest. The areas vary from 6 to 9 pages with two always given to map and photos so that text varies from 4 to 7 which is quite a large variation. Speldhurst is the area which has most pages, 9 which reflects its extent and complexity.</i></p> <p><i>The whole document has been reviewed by the author of the HLC and suggested changes from that review have been considered.</i></p>	<p>No change</p> <p>No change</p>

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		<p>Smockam Farm and Reynolds Meadows are shown to be a complete survival of medieval assart fields and ancient woodland with the farmland of Caenwood to the north consisting of unimproved or semi improved grassland in regular formal fields some of it medieval and the remainder post-medieval or early modern. They are of major ecological significance with great biodiversity. Having been cut off for so long from the more intensively managed agricultural landscapes elsewhere in the Weald they retain features mostly lost in today's larger working farms. Smockham and Caenwood farmhouses should be shown on the Historic Landscape Characterisation maps as early farmsteads as well as being listed buildings. Smockham, together with what is Reynolds Lane, is one of the few places in existence today already shown in Edward Hasted's map of the Hundred of Wachlingstone 1797.</p> <p>Evidence of transhumance to this Anglo Saxon "Den" exists in the form of surviving ancient drovers' routeways. Reynolds Lane is typical of the High Weald pattern in running north to south from the high ridge at Speldhurst Road towards another ridge on Mt Ephraim. Along with Cornford Lane, it is the only such Rural Lane within or on the periphery of the town which maintains its early character, the other routeways having since become major roads. There is an intersection of the ancient routeways at the bottom of Reynolds lane where unmetalled Smockam Lane is part of a network of routeways from Reynolds Lane to Rusthall and Speldhurst which survive today but only as footpath/bridleways.</p> <p>Remnants or scions of the Scots Pines shown in the distinguished local Victorian artist Tattershall Dodd's picturesque 19th century views of Culverden Down and the corner of Reynolds Lane over 160 years ago prior to metalling may still be seen today contributing to the Arcadian atmosphere of this part of the High Weald, some of it now within the limits to built development of RTW. The paintings link the past with the present to reinforce the sense of place and historic vistas that contribute so much to the character of RTW and to its</p>	<p><i>Whilst the comments are valid this level of detail cannot be sustained across the whole document and its main purpose is to address the wider character rather than every site or feature. Many of the points raised are covered in general text, the Historic Landscape Characterisation Study and the AONB Management Plan.</i></p> <p><i>An important point made in the comments however is the association with the painter Tattershall Dodd and his picturesque 19th century views. Reference to him and his works should be included.</i></p>	<p><i>Add to Evidence of past use and Evolution Page 60 a new entry "The landscape of the area is celebrated in the 19th century picturesque paintings of Tattershall Dodd a renowned local artist.</i></p>

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		<p>attractiveness as a favoured tourist destination. Retention of these landscapes is as important as safeguarding listed buildings.</p> <p>The landscapes described above remain of significant historic importance as well as providing a continuing network of green routes for our local residents, corridors for foraging and breeding wildlife and also important reservoirs of increasingly rare wild flowers. They are deserving of continuing protection and enhancement to give real substance to the concept of “sustainability” for the long term.</p>	<i>Noted</i>	<i>No change</i>
LCA 5	Historic England	<p>Draft Landscape Character Assessment Supplementary Planning Document (SPD)</p> <p>Thank you for your email of 2 May 2017 inviting comments on the above document.</p> <p>As the Government’s adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages and levels of the local planning process and welcomes the opportunity to comment upon this key planning document.</p> <p>Historic England fully endorses the Landscape Character Assessment and supports its adoption as Supplementary Planning Document. It is a thorough and comprehensive analysis of the subject that fully encapsulates the elements of the historic environment that contribute to the Borough’s rich and diverse character.</p> <p>Historic England would strongly advise that the Council’s own conservation staff are closely involved throughout the preparation of the Local Plan, as they are often best placed to advise on local historic environment issues and priorities, sources of data and, consideration of the options relating to the historic environment, in</p>	<i>Comments and support noted</i>	<i>No Change</i>

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		<p>particular the requirement to set out a positive strategy for the conservation and enjoyment of the historic environment (NPPF para 126).</p> <p>These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.</p>		
LCA 6	Mr Terry Cload	My name is misspelled. It is Terry Cload. (Page 208)	<i>Noted</i>	<i>Correct spelling on page 208</i>
LCA 7	Mr Terry Cload	The Landscape Character Assessment is an excellent document but it is of little use if the Council only pays lip service to its contents and recommendations. Councillors need to embrace it strongly and use it continually to inform decisions especially in planning matters.	<i>Noted</i>	<i>No Change</i>
LCA 8	Spatial Policy Team Maidstone Borough Council	Section 7 of the document identifies that landscape character does not stop at administrative boundaries and that the assessment aims to join up with the equivalent studies in neighbouring areas. For Maidstone borough it is the 'Maidstone Landscape Character Assessment' (March 2012) to which the assessment's authors should have regard.	<i>Noted</i>	<i>No Change</i>
LCA 9	Tunbridge Wells District Committee Campaign to Protect Rural England	<p><u>General comments on the draft TWB Landscape Character Assessment 2017</u></p> <p>This is generally a well-researched document which will provide an excellent long term reference and policy document on historic evolution of the landscapes, their valued features and qualities,</p>	<i>Support noted</i>	<i>No Change</i>

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		<p>detractors, changes and opportunities. CPRE are pleased to see that the Council propose to adopt the assessment as a Supplementary Planning Document.</p> <p>Less welcome is the apparent underlying assumption, perhaps stemming from the NPPF, that landscapes in the Borough are inevitably liable to undergo substantial future change and that this may at best be mitigated rather than refused, with a little enhancement taking place as a quid pro quo for perhaps significant losses of cherished landscapes. We hope that suitable weight will be given to this document in identifying legitimate constraints, so that the suburbanising sprawl or ribbon development to which many of these landscapes may otherwise become subject can be avoided.</p> <p>CPRE are particularly pleased to see the references in paragraph:</p> <p>3.3.4 to securing legal agreements or conditions for long term conservation and management of retained features,</p> <p>3.3.7 to controlling or resisting loss of a sense of remoteness and perceived qualities of peacefulness and remoteness</p> <p>3.3.8 to the need to protect dark skies from light pollution</p> <p>3.3.9 to the need to protect Rural Lanes</p> <p>3.3.12 to protection of unimproved and semi-improved grassland</p> <p>3.3.17 to protection of distinctive ghyll and shaw woodlands</p> <p>3.3.18 to enhancement of hedgerow boundaries</p>	<p><i>Comments noted</i></p> <p><i>Noted</i></p>	<p><i>No Change</i></p>

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		<p>However, the appraisal fails to pay close attention to the needs of biodiversity. A landscape scale approach to biodiversity conservation should be a prominent element of landscape assessment. This study does not pay adequate attention to the needs of biodiversity and the critical tasks of conserving, creating and extending BAP habitats within landscapes. The proposed SPD fails to pay sufficient attention to the relationship between biodiversity conservation and landscape in the identification of landscape scale green infrastructure.</p> <p>In the section titled 'Borough Landscape Character Overview', we strongly recommend that it should refer to (and include mapping for) biodiversity designations, Biodiversity Opportunity Areas, agricultural land classification, land use and tranquillity (available from CPRE). Mapping these elements helps understand and interpret landscape information. Although text associated with individual character areas discusses priority habitat types, this information needs to be understood on the landscape scale. Landscape scale green infrastructure is key to climate change adaptation and NPPF para 117 sets out the need to 'plan for biodiversity at a landscape-scale across local authority boundaries'. The document should demonstrate an understanding of the contribution of landscapes to 'wider ecological networks'.</p> <p>Guidance on using the document in planning application submissions would be helpful. We would hope that all relevant planning applications will be expected to identify Landscape Character Areas and demonstrate an understanding of the landscape strategy and opportunities for each character area. Perhaps this should happen at the validation stage. The 'direction of travel' (such as conserve and enhance) expected should be clearer. They are in the document as part of the local objective in boxes titled 'landscape strategy' but</p>	<p><i>Noted – it is difficult for such documents to be all things to all men and the document does follow accepted methodology. Each character area does have 'natural landscape and priority habitats' and it would be difficult I feel in each character area to say much more on this but I do feel that it could benefit from a section on biodiversity in section 1 and 3 pointing to borough wide issues and how all development should contribute to conserving and enhancing biodiversity. We can refer to the biodiversity statement for the High Weald and other guidance by the Council.</i></p> <p><i>The Council is working on a separate Biodiversity evidence base and this can be referred to. This will cover items such as Biodiversity Opportunity Areas. We should consider inclusion of the CPRE tranquillity maps.</i></p> <p><i>Noted – The document will be a material consideration for all planning applications once adopted. Agree that the key objectives could be more prominent and suggest we address this with a short piece of text/objectives as a preface to the introduction.</i></p>	

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		<p>should be prominent.</p> <p>The document should include a suggested list of appropriate tree and hedgerow species in each character area. It should also ensure the likely impact of ash dieback is understood.</p> <p><u>Specific comments</u></p> <p>For Character Areas 1 and 13 mention should perhaps be made under “valued features and qualities” of the wildflower-rich verges on the lanes (ancient droeways) that run generally north-south between Areas 1 and 13. While there is mention of biodiversity on the sunken lane banks in Area 1 and of wildlife habitats in the ditches in Area 13, the wildflower-rich verges in area 13 which are a much valued landscape feature, especially in Springtime, are not mentioned at all in the document.</p> <p>We would also like to see attention drawn to the extent to which the special landscape features and tranquillity which can be found within little more than a mile of Tunbridge Wells Town Hall on most sides of the town contribute to the town’s sense of place and to health and recreation for the town’s population.</p>	<p><i>The Council has published an Advice Note on this which is referred to at 3.11.</i></p> <p><i>Agreed</i></p> <p><i>This is mentioned in Area 5 key characteristic 13. Something similar can be added to area 19 key character 8 which has the same qualities</i></p>	<p><i>Add text on wildflower rich verges to item 3 in area 1 and as a new point in area 13.</i></p> <p><i>Review area 19 key character 8 to reflect qualities in area 5 item 13.</i></p>
LCA 10	Lamberhurst Parish Council	<p>There is a general concern that within the landscape characteristics it is highlighting areas which are more suitable for development especially within the AONB all landscape should be treated with equal regard as it has special qualities.</p> <p>However it is good to see the alignment of the High Weald AONB Management Plan with the landscape context.</p>	<p><i>Noted but not sure how it does this. The document makes reference to the European Landscape Convention in that all landscapes matter and the objectives in the document apply to all landscapes.</i></p> <p><i>Noted</i></p>	<p><i>No change</i></p>

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LCA 11	Gladman Developments	<p>1.1 Background</p> <p>1.1.1 It is noted that the Council are also consulting on a draft Landscape SPD alongside the Issues and Options for the Local Plan. However, having reviewed the draft SPD it appears to actually not be an SPD but an evidence base document on Landscape Character Assessment. It contains no policies, nor does it advocate or explain how it builds upon pre-existing policies in the adopted Tunbridge Wells Core Strategy, to which it is presumed is the overarching document to which the SPD is supposed to hang.</p> <p>1.1.2 We would note what the PPG states with regard to SPDs^[1].</p> <p>“Supplementary planning documents should be prepared only where necessary and in line with paragraph 153 of the National Planning Policy Framework.</p> <p>They should build upon and provide more detailed advice or guidance on the policies in the Local Plan. They should not add unnecessarily to the financial burdens on development.”</p> <p>1.1.3 As we have expressed above the document is very clearly an evidence base document, which will be important to the preparation of Landscape Policy in the emerging Local Plan. There is no justification for the Council in considering this an SPD, particularly as it is not written as such.</p> <hr/> <p>^[1] Planning Practice Guidance - Paragraph: 028 Reference ID: 12-028-20140306</p>	<p><i>The document explains the relationship with existing and emerging policy at 6.1 and 6.2 and further explains the relationship with the NPPF at 6.3 to 6.7. Core Policy 4 specifically refers to the Landscape SPD and given the value that members and residents place on the landscape have previously adopted the landscape assessment as SPD and see no reason to change that view. It contains not just descriptive material but also Objectives and Strategies which suggest that adoption as SPD would be appropriate.</i></p> <p><i>There is nothing in paragraph 153 of the NPPF or Paragraph: 028 Reference ID: 12-028-20140306 of the NPPG that suggests that the Council cannot make this an SPD.</i></p>	No Change

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LCA_12	High Weald AONB Unit	<p><u>Proposed Status as SPD</u></p> <p>A Landscape Character Assessment is an important element of the evidence base for the Local Plan, but it is very unusual to make it a Supplementary Planning Document.</p> <p>It is not clear what policy this document would be supplementing or how it would be used to inform planning decisions.</p> <p><u>General comments</u></p> <p>The Assessment uses non-specific descriptive language designed to bestow value on particular features, apparently reflecting the opinions of the individual who carried out the assessment. This limits its usefulness as an objective tool to inform planning decisions.</p>	<p><i>It is not at all unusual to make such documents an SPD. TWBC has had a LCA SPD for 17 years and other LPA's also have Landscape SPDs such as at Sevenoaks and Ashford. How such documents are incorporated into a development plan is a matter for the LPA but publication as an SPD does give it more weight in planning decisions and is supported by Historic England and CPRE.</i></p> <p><i>The document is to supplement to supplement Core Strategy Policy 4 which refers to the application of the Borough Landscape Character Assessment. All the policy guidance, references methodology are contained in part two. The preparation and use of landscape character assessments is referred to in the NPPF para 170 and the NPPG para 001 Reference ID: 8-001-20140306 "to inform, plan and manage change". In terms of application there is a user's guide at the very front.</i></p> <p><i>This assessment has been prepared in full accordance with published industry standard methodology. It follows a broadly similar pattern to previous editions which had the full support of the</i></p>	<p>No change</p> <p>No change</p>

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		<p>Although historic landscape characterization is mentioned in the introductory chapters, this LCA favours visual amenity over the material character and function of the landscape. For example, Frittenden is 'loosely-knit'; vernacular buildings are 'attractive'; the valleys of the Kent Ditch and Rother are described as 'empty' despite containing rich grazing pasture; unmanaged hedges are described as 'detractors' with no thought for the potential ancientness of the earthworks upon which they grow.</p> <p>Under LCA 10, despite one of the key characteristics being the visual richness of views screening is proposed along the main roads so as to eliminate the views.</p>	<p><i>AONB unit. The methodology is clearly set out in part 2 and shows that the assessment was in two parts the first being values associated with the High Weald AONB which, in order included, reference to the AONB, High Weald special characteristics and qualities, Key AONB components (geology, settlement, routeways, woodland, field and heath), Distinctive details, Scenic Beauty, visual relationship with AONB. The second part covered in order; landscape condition, Scenic quality, Distinctiveness, natural/historic interest, landscape function, perceptual aspects and Associations. The output of landscape character assessments is necessarily largely descriptive but is built upon detailed objective assessment and in this case extensive public engagement and previous studies and so is the distillation of many opinions and views.</i></p> <p><i>I think this is a misunderstanding of what is being said at LCA 10 (detractors and opportunities page 99) What the guidance actually says "locally sensitive screen planting in</i></p>	<p>No change</p> <p>No change</p>

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		<p><u>Settlement and building character</u></p> <p>1.19 – the description of settlement character deviates from both the High Weald AONB Management Plan which covers 69% of the borough and Natural England’s National Character Area profiles for the High and Low Weald. The dominant settlement characteristic in the Weald is one of dispersed historic farmsteads and hamlets. It is important to understand that, although morphologically villages may appear to be both nucleated and linear, the terminology is misleading. Using Historic England’s guidance (https://content.historicengland.org.uk/images-books/publications/iha-medieval-settlements/medievalsettlements.pdf/) it is clear that although there may be some row plan villages in the Weald the historic character of the majority will be agglomerations or polyfocal plans formed around greens or routeway junctions, some of which may be along ridges. They may appear linear as a result of more recent infill development.</p>	<p><i>association with development proposals” to screen the visual impact of development and to help with noise – there is no recommendation within this that main roads should have wholesale screen planting to screen views.</i></p> <p><i>The description will of course take note of how the landscape appears today as this is a key part of the methodology which is fully explained. The historic settlement pattern is clearly explained at 1.25 table 1-2 “Dispersed historic settlement pattern of farmsteads, hamlets and late medieval villages founded on trade and non-agricultural rural industries” and as can be seen in part two the information on settlement pattern provided by the AONB Unit was used in the study. Never the less, I can see for the avoidance of doubt why you would want to see something repeated here and have suggested some additional wording.</i></p> <p><i>It is unfortunate that the Unit has not been able to recognise some important aspects and real benefits of this document that support High</i></p>	<p><i>Add wording to 1.19 to reflect the underlying pattern of the high weald as one of Dispersed historic settlement pattern of farmsteads, hamlets and late medieval villages founded on trade and non-agricultural rural industries</i></p> <p><i>No change</i></p>

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			<p><i>Weald AONB Management Plan objectives. The update has allowed it to incorporate recent studies on Agricultural Land, Historic Farmsteads, Historic Parks and Gardens, Historic Landscape Characterisation (HLC) and Light pollution.</i></p> <p><i>It has also been able to draw on the revised AONB Management Plan and all currently available data from the High Weald Unit on the components of natural Beauty and updated national Character statements.</i></p> <p><i>The HLC has been particularly useful and has added a great deal of information and depth to the assessment. Dr Nicola Bannister has inputted greatly and I have some final edits from her to add to ensure it is faithful to the study.</i></p> <p><i>Historic England describe the document as “a thorough and comprehensive analysis of the subject that fully encapsulates the elements of the historic environment that contribute to the Borough’s rich and diverse character”.</i></p> <p><i>The assessment deals particularly clearly with the relationship between the High Weald National</i></p>	<p><i>No change</i></p>

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			<p><i>Character area, designated AONB and former High Weald SLA and the role such areas play in setting of the AONB.</i></p> <p><i>The AONB is covered in detail in valued features at qualities in both the assessment process the introduction and where appropriate in each character area.</i></p> <p><i>It is perhaps an oversight of the AONB Unit that despite the small criticisms they have made that they did not recognise these positive elements nor indeed the level of public engage that the Council undertook and the innovative methods of public engagement that it tried.</i></p>	
LCA 13	Environment Agency	<p>Apologies for the delay on responding to this consultation.</p> <p>Fortunately, we have no concerns with this document and therefore no comments to make.</p>	No comment	No change
LCA 14	Cranbrook & Sissinghurst Parish Council	<p>We looked at LCA 4, LCA 6 and LCA 7 as they cover the majority of the Parish. On the whole we found the document to be comprehensive but a few omissions were found and some queries raised, as follows –</p> <p>Omissions -</p> <p>a) In all 3 sections no mention is made of the distinctive pit cons, which pepper the landscape. These remnants of the areas medieval</p>	<p><i>General comment of support noted</i></p> <p><i>It is not possible to cover all historical features in depth for each area and is not the primary purpose of the document. The iron industry is covered in section 1.12 for the</i></p>	<p><i>Check reference to 'pit cons' and amend accordingly.</i></p>

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		<p>iron industry are surely a much “valued feature”. There are also remnants of mill ponds from the medieval cloth industry e.g. the location of the Crane Valley skate park. These run for the length of the river Crane and other streams in the parish e.g. Hockeredge. Again these are distinctive and are of historical and ecological significance.</p> <p>b) In LCA 4 “key characteristics” point 3) The far reaching view from Hartley to the South (to the Coast ridge) to the East (View of Benenden School) and to the North (to the North Downs) should be included. There are also views of the North Downs from Turnden Farm.</p> <p>2. Queries/Inaccuracies</p> <p>a) Use of archaic terminology “Shaw” and the spelling of “ghyll”</p> <p>b) Disagree that Cranbrook is in an “elevated location”</p> <p>c) by mentioning only buildings of vernacular styles, does this imply a disinclination towards more progressive approach to the promotion of well – designed but modern architecture?</p> <p>3. Endorsement of High Weald AONB unit –</p> <p>We support the work of the High Weald AONB Their historic landscape character maps of geology, watercourses, ancient</p>	<p><i>whole borough and is mentioned in several sections related to Evidence of past use. The cloth industry gets a particular section in LCA 4. I will check the reference to ‘pit cons’ with heritage advisors and the parish council.</i></p> <p><i>Whilst we cannot accommodate all views it is perhaps worth making reference to these.</i></p> <p><i>Shaw and ghylls are both terms used by the High Weald AONB Management Plan. Ghyll is an acceptable or variant form of gill that appears in the Collins English Dictionary.</i></p> <p><i>The reference to elevated (LCA4 para 8) is a reference to the settlement being at 65 to 100m above sea level on part of the High Weald plateau. Para 9 correctly refers to Cranbrook being “nestled in the landscape”.</i></p> <p><i>Vernacular architecture can be an inspiration for modern buildings but it is important that designs are fully justified in terms of their approach</i></p> <p><i>Noted and agreed. The information</i></p>	<p><i>Add text to LCA 4 point 3: ... far reaching view from Hartley to the South, East and North views north from Turnden Farm.</i></p> <p><i>No change</i></p> <p><i>No change</i></p> <p><i>No change</i></p>

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		woodland, field & heath, ancient route ways and historic settlement patterns should form the basis of any consideration of landscape character assessment.	<i>from the High Weald has informed the assessment and they have commented on it.</i>	<i>No change</i>
LCA_15	Highways England	<p>Thank you for consulting Highways England on the above documents, seeking a response no later than 12 June 2017.</p> <p>Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.</p> <p>Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the SRN, in this case with particular reference to A21.</p> <p>With regards the various documents, we would comment as follows:</p> <p><u>Draft Landscape Character Assessment Supplementary Planning Document (SPD)</u></p> <p>We note that the original CASPD was published in 2002 and updated in 2011 to ensure consistency following changes in guidance and policy. The 2011 review updated policy and contextual information but the landscape assessments and objectives sections remained unchanged. In contrast, the draft 2017 revision is based on new evidence, consultation and field survey.</p> <p>We note the various references to the A21 in the document, including</p>	<i>Comments Noted - Highways England will take account of the new document.</i>	<i>No Change</i>

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		<p>where it is considered a detractor, but equally where recent improvements, such as at Pembury, are opening up new views of the landscape.</p> <p>In accordance with the Highways England Licence, in exercising our legal duties and other obligations we will act in a manner best calculated to, <i>inter alia</i>,</p> <ul style="list-style-type: none"> • Minimise the environmental impacts of operating, maintaining and improving the network and seek to protect and enhance the quality of the surrounding network; and • Conform to the principles of sustainable development ie encourage economic development while protecting the environment and improving safety and quality of life for current and future generations. 		