

National Landscape And Visual Impact Appraisal



Above: Vista from the 'window to the AONB' i.e. main Sole Street road ('The Wealdway') where proposed winery/bottling facility to be sited between the sun and horizon in the National Landscape. **Below:** Extended long-distance views from proposed site of 1.3km across the National Landscape to Meopham sought by the Applicant as indicated to Cobham Parish Council. The building is exactly positioned to face this direction and at such elevation as to be maximally visible, and further, intrudes on 5 Public Rights of Way, and endangers pedestrians on one.



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A Protected Valued National Landscape



The window to the AONB viewed from the centre of the village on the main Sole Street road. The route lies on the 'Wealdway', an important and notable walking route. The development is proposed to be sited between the sun and the horizon.

'Any attempt to create a division between what visitors need and what locals want will always be arbitrary: lots of people who live in national landscapes love their natural beauty, and lots of people who visit want to be in places which are real communities. It is a shared interest.'

Government's Landscape Review 2019

On 26th December 2023, a new duty came into force in English National Landscapes. This duty says that all 'relevant authorities' (generally, those with a public function), 'must seek to further the purposes' of the designated landscape; for National Landscapes, this purpose is conserving and enhancing natural beauty. This duty features in Section 245 of the [Levelling-up and Regeneration Act 2023](#), which gained [Royal Assent on 26 October 2023](#) – and it overrides and strengthens the previous duty to 'have regard' to the purposes.

[National Landscapes - National Landscapes welcome strengthened duty for natural beauty \(national-landscapes.org.uk\)](#)

Preface

This report summarises the requirements of the statutory Kent Downs AONB Management Plan ('the Plan') in relation to the themes within the 320 objections submitted to Gravesham Borough Council. It further represents the views expressed within the Plan on behalf of the signatories who concur with it. All are residents of the local communities.

It is consistent with the statutory duty of regard to seek to further the purpose of conserving and enhancing the area and its setting. It highlights objections to development proposed at a prominent visual platform situated at the apex of a National Landscape - an area designated as being worthy of the greatest weight in considerations. It describes how this development affects 5 different Public Rights of Way, including one that is 1.3km away in the National Landscape and why this is not an ideal location for a large winery and bottling plant, with associated traffic and ancillary impacts, by being located in a vista that is a valued landscape and integral window to the National Landscape, viewed from a nearby settlement and other vantage points.

For each section, the statutorily relevant policies are indicated and the content should be read in conjunction with the associated submitted reports:

- Acoustic Memo
- Light Impact Review and Assessment
- Transport Dynamics Representation Statement
- 4TY Planning Statement
- Landscape Character Statement
- Site Options Study
- Odour Statement
- LVIA Survey
- 320 Public Objections

This report was prepared by [REDACTED] with many thanks to the hundreds of people in the communities of Luddesdown and Sole Street who contributed their passion, efforts and dedication to providing insights and views that made it possible.

[MPP1 – MPP6]

1. History and Demography



Existing tree lines on Gold Street accessible via existing field gate.

The area between Cobham and Luddesdown has been shaped by thousands of years of human activity – in the fields and woods, tracks, lanes, villages, and hamlets, an indelible memory of past times has been left to us. At the same time the extraordinary landscape is particularly intricately linked to the lives of events and figures of historical importance. Evidence spans from the period of paleolithic human activity exists the Norman invasion – an event that altered the course of British history and shaped it for a millennium. William the Conquerors' half-brother, Odo, owned a house in the area, and was responsible for the Bayeaux Tapestry and the magnificent Rochester Castle nearby. Charles Dickens, Sir Robert Pocock and more recently, the late Sir Michael Gambon have trodden these paths.

The village of Luddesdown has ancient Anglo-Saxon roots, it's name relating a relationship with the hills, from the Anglo Saxon for 'peopled hill'. It is a 'properly ancient' part of the country, and despite being adjacent to the M2 corridor and nearby towns and conurbations of Gravesend and Medway, more distinctive for its preservation and tranquility since 975 AD. The adjoining settlements of Cobham, and Sole Street are similarly historic. Thus, while the landform and geology underlie its beauty, the Kent Downs AONB is very much a cultural landscape.

The population of the Kent Downs AONB in 2011 (most recent census information) is estimated to be approx. 96,000 or around 5.5% of Kent's population. The villages of Sole Street and Luddesdown, between which the application site sits, are small, intimate and have populations estimated to be 987 and 204. The relationship between the land and the

people who live there is not parasitic, and there is an exceptionally powerful sense of rural identity and culture.

The population here is generally older, and a higher percentage of people are self-employed, resulting in more home-working and indicative of an increasing knowledge-based economy within the AONB. The rural communities here are active and entrepreneurial; they are a considerable asset which can be harnessed to secure the future of the AONB, a fact recognised by the Kent Rural Delivery Framework evidence base. The area offers a place for recreation, health and well-being to these communities and those who visit, but the relationship needs to be carefully protected so that landscape qualities, community life and benefits are not compromised.

The area is regarded for its rural, undisturbed scenery, 'quiet countryside', epitomising the garden of England, with orchards, houses from just after the Norman conquest and later periods, and rich cultural heritage. It is villages like these that ensure Kent sustains a leadership position when it comes to tourist perceptions. Even amongst those who have never visited Kent, the area contributes to the country being seen more positively than its neighbors on the most motivating imagery dimensions (Visit Kent 2018). Many of these features are provided 'in spades' by the landscapes between Cobham, Luddesdown and Sole Street. It is therefore no surprise it is designated as a National Landscape and 'on par' with National Parks, and therefore worthy of the highest protection.

Local characteristics and qualities of the area surrounding the application site represent the triumph of the distinctive and the diverse over the uniform - the sights and scents, the ecosystems, the landscape, the time depth, access routes, patterns of settlement and farming practices which have responded to them all over centuries in a sustainable and sympathetic way. A balance has been struck between viable, resilient, and competitive farming enterprises with sensitive environmental management in a landscape of national importance.

There is a powerful sense of place at the settlement boundary which comes from being within and adjacent to a landscape factually designated as exceptional. These qualities, features, and experiences should not be seen in isolation but carefully understood and assessed in terms of the site and its setting and the local landscape character. Supporting this are the landscape elements, context, special character and qualities, distinctiveness, sense of place, patterns, and sensitivities; how it is perceived by people and for what reasons it is valued by people. As the governments Landscape Review 2019 declared, 'lots of people who live in National Landscapes love their natural beauty.'

[SD1 –SD14]

2. Public Rights of Way (PROW)

Every effort should be made to ensure a high quality, well-maintained Public Rights of Way network, that is well used and enjoyed. The use of the network supports the Kent economy, encourages active lifestyles and sustainable travel choices that support health and wellbeing, and contributes to making Kent a great place to live, work and visit

An evidence-based approach for the Kent Rights of Way improvement Plan identifies key priorities for the improvement and enhancement of the network which would support better use; a common theme is the enhancement of the quality of paths and bridleways including better surfaces, fewer barriers, clear signing, and more accessible information. The applicant's proposal is clearly contrary to this policy. Traffic and disturbance from HGV's, employees, delivery drivers, and visitors will bisect NS190, as documented in the traffic assessment report, and creates very significant safety risks. 'Agri-tourism' and ancillary activities allowed under permitted development will have irrevocable impacts on the character of the area in addition to the traffic from numerically greater utilisation of agricultural machinery associated with viticulture cultivation, notwithstanding the greater need for spraying.

The evidence base for the Rights of Way Improvement plan adds to this saying, 'Our research showed that the clear majority of PROW users experienced only positive feelings relating to vitality and happiness when using the network, showing how valuable the network is in improving people's quality of life through health and wellbeing benefits.' It is recognised there is a need to enhance, extend, connect, and improve fragmented Public Rights of Way network and secure higher rights on PROW without harming the characteristics and qualities of the AONB.

Furthermore, there is a 'need to ensure that the PROW network is accessible and welcoming, well signposted, way-marked, connected and maintained using materials and equipment appropriate in design and sustainably sourced'. This would not be plausible were NS190 bisected and then also subject to traffic. Emerging from a gap in a hedge blindly into the path of vehicles would also present danger and significant risk of injury or death, especially in an unlit area where such traffic is unexpected.

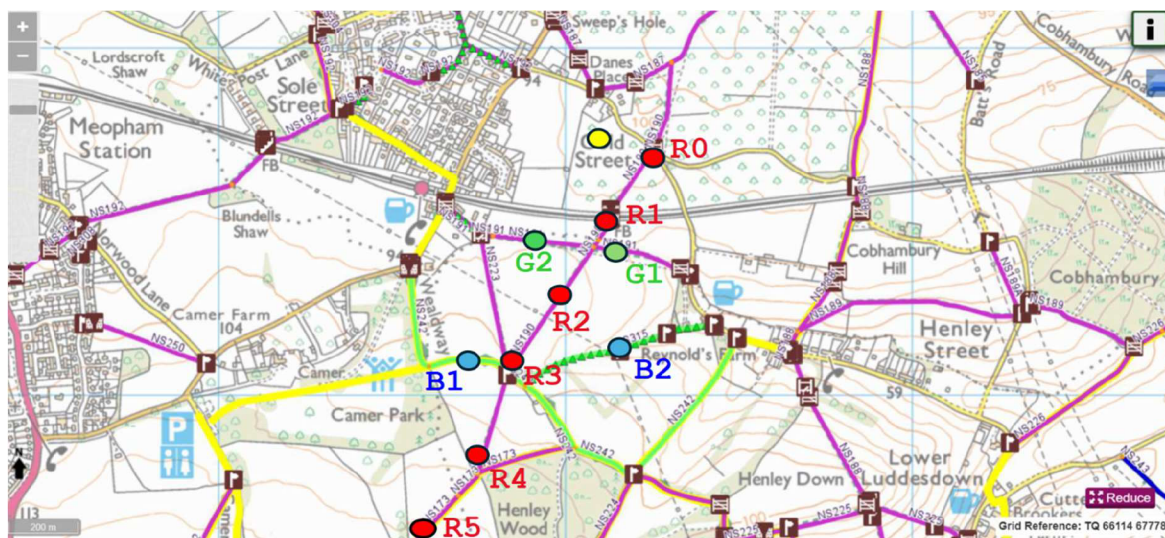
Older walkers, those with sensory impairments like hearing or sight, or disabilities, would be most at risk as once endangered they would be less able to evade injury. It is impossible to see how the objective of a legally defined, well maintained, connected, and promoted Rights of Way and permissive path network can be achieved that provides 'safe,

welcoming, well designed connected and satisfying routes' where conflicts between rightful uses are minimised'.

The Kent Downs AONB Management Plan factually states that, 'Diversions and stopping up of PROWs must be resisted unless it can be demonstrated that they will not have a detrimental impact on opportunities for access and quiet enjoyment of the Kent Downs AONB landscape and historic character.' It further states that, 'Proposals which detract from the amenity and enjoyment of users of the Public Rights of Way network will be resisted.' An indication of the importance of this is seen where it concludes that, 'Mechanisms will be supported to resolve conflicts between rightful users of Public Rights of Way. Where there are irreconcilable conflicts from legal but damaging activities, quiet recreation will be supported above other activities.' (Our emphasis)

For the reasons set above taken from the Kent Downs AONB Management Plan, the application must be refused.

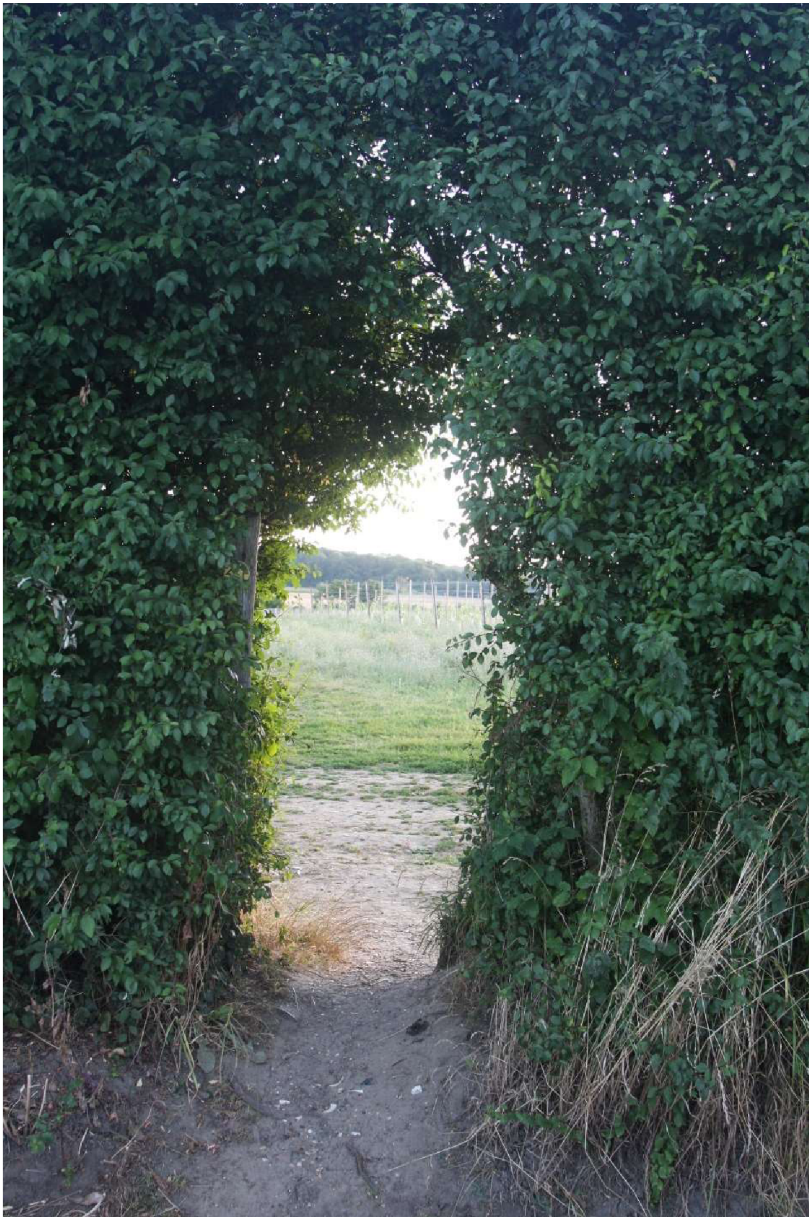
[FL1- FL10]



Public Rights of Way and Bridle Paths [KEY R=NS190 G= NS191 B=NS315 BRIDLEPATH]

The Luddesdown National Landscape is extensively crossed with Public Rights of Way (PROW's). The proposed location has a major seriously adverse impact upon the National Landscape and Public Rights of Way network. Five (5) PROWS are affected by the proposed siting: NS190, NS191, NS315, NS242, NS223. A survey of 124 stakeholders has revealed that 92% felt that a valuable appreciation of the landscape is gained from public local public rights of way and would be affected by the proposed site.

The following images show the visibility of the development site from key points around the landscape, to a distance of 1.3 km within the National Landscape. Images were taken in September 2024, trees and vegetation are noted to be deciduous, as is characteristic of the area, and in full leaf. For comprehending scale, the development can be conceived as having a length in excess of 3 double decker buses, a height of more than 2 double decker buses, and a width in excess of the length of 1 double decker bus. The applicants field toilet is highlighted in the images for reference to scale and visibility.



Blind, unlit, entrance to NS190 stepping off the verge and immediately down and into path of agricultural traffic, visitors, employees, delivery drivers etc.



View from gap in hedge by Gold Street on proposed vehicular track showing extent of long range views from which traffic will become visible. The furthest viewable distance from here lies 1.3km distant (R5), from which the development is visible (see front cover also)..



[POINT R0] View from NS190 showing building at apex of site will dominate the National Landscape ridge and skyline



[POINT R1] View from NS190 off footbridge showing prominence of proposed site (approximately behind yellow hazard sign). NS190 is visible to the right as it approaches Gold Street.



[POINT R1] View from on NS190 footbridge showing prominence of proposed site (approximately behind yellow hazard sign). NS190 is visible to the right as it approaches Gold Street.



[POINT R2] View from NS190 across railway line and in midpoint of field showing prominence of proposed site. NS190 is visible to the right as it approaches the footbridge and runs then to Gold Street.



[POINT R3] View from NS190 across railway line and intersections with NS242 and NS315 showing prominence of proposed site (to left of pylon). NS190 is visible to the right as it approaches the footbridge and runs then to Gold Street. Applicants' toilet cubicle visible at this distance.



[POINT R4] View from NS190 between Camer Park and Henley Wood showing prominence of proposed site (to left of pylon). NS190 is visible to the right. Applicants' toilet cubicle visible at this distance.



[POINT R5] View from NS173 at next copse beyond Camer Park and Henley Down showing prominence of proposed site (to left of pylon) at 1.3 km distance.



[POINT G1] View from NS191 showing direct views of proposed site (the footbridge serves to guide the eye up to site).



[POINT G2] View from NS191 showing direct views of proposed site.



[POINT B1] View from Bridle Path, showing direct views of proposed site, position chosen to include signage.



[POINT B2] View from Bridle Path, showing direct views of proposed site (in field behind pylon and to left).



Vista from footbridge looking back to NS190 across which traffic including lorries, delivery drivers, employees and visitors will be visible from an extended distance that reaches the entire length of NS190 (1.3km).



The proposed site and the long-distance views sought by the Applicant, reaching 1.3km into the National Landscape, from which point the building. Ancillary activities and disturbance will be highly visible due to its elevation.

3. Landscape



View from approximate site of proposal showing prominence and intrusion in the Sole Street 'window to the AONB'. The location is 20 feet higher than the lowest point of the site, and closest to the settlement.

- *The presumption should be against AONB edge developments where they impact upon views into and out of the AONB landscape.*
- *Conserve sensitive parts of settlement settings. Maintain a direct relationship between the old settlement core and the surrounding landscape, allowing views in and out.*
- *Where this is unavoidable ensure that buildings and infrastructure are located to avoid loss of important off-site views towards features such as church towers, fine buildings, or the wider landscape, as well as avoiding intrusion onto sensitive ridgelines, prominent slopes and damage to distinctive landscape settings.*
- *Avoid siting new farm buildings on sensitive ridgelines, on very prominent slopes or where they could adversely affect the setting of historic farmsteads.*
- *Conserve the setting of historic isolated settlement*
- *Ensure any small-scale development does not erode rural character and is integrated by woodland edges, shaws and hedgerows linked to the existing network.*
- *Make maximum use of site contours without major earthworks.*

The site and surrounding area, de facto, ones of high landscape sensitivity. The only evidence relating to landscape character is a Landscape Statement undertaken by LHLA, extended across the entirety of the applicants parcels of land in a Site Option Study. It is the contention of this submission that an assessment of a planning application would be bizarre if the way a red line is drawn, defining the site on whatever basis was appropriate, and which need have nothing to do with landscape issues, crucially affected landscape evaluation, where in most cases, a development site is but part of a wider landscape.

Survey

A survey was conducted to identify landscape characteristics and landscape qualities at a granular level using a societal viewpoint in order to assess landscape value. This approach is consistent with the definition of landscape value within guidance from the Landscape Institute (GLVIA3). The definition makes it clear that it is 'society' that that assigns values to landscape.

A criterion based approach to landscape lead development was taken based on Box 5.1 of GVLIA3 that describes the 'range of factors that can help in the identification of a valued landscape'. A 20-question survey was undertaken using recognized domains from Box 5.1 of GLVIA3: natural heritage, cultural heritage, landscape conditions, associations, distinctiveness, recreation, perceptual (scenic) and perceptual (wildness and tranquillity domains). The survey was posted on the Luddesdown National Landscape Society website ([Luddesdown National Landscape Society](#)), publicised on the Luddesdown Society Facebook page, Sole Street Facebook page and disseminated through social media. The survey period was 16.9.24 to 22.9.24, 130 responses were received.

Discussion

*The findings show that the overwhelming majority of stakeholders indicated the site to be a valued landscape in relation to the settlement boundary and local area. They placed very great importance on the tranquillity of the area. There was an overwhelming majority in agreement that the specific site for the proposed development would negatively affect amenity, tranquillity, visual landscape and the character of the area. **The results evidence that a major adverse impact arises from the specific siting.***

There is exceptional concern regarding continual pressure for development and change that creates a cumulative impact on the distinctive character and qualities of the AONB at this unique location. The applicant's proposal is an example of a small scale poorly designed, inappropriately located development, with further detracting influences from

permitted ancillary sequelae such as visitor attractions, poor boundary treatments, badly designed highways, that progressively diminishes the qualities and character of the AONB.

It is an area whose character has been defined by the vista from the Sole Street settlement main road that is integral and extends into the village of Sole Street where it has been an important part of the quality and character of life for people everywhere in the community, since the settlement was established. An important reason to refuse this application is because it has an intrusive impact on the distinctive landform, landscape character, special characteristics, and qualities, the setting, and views to and from the Kent Downs AONB. The proposed location also results in physical severance between the area west of the development from the east, and introduces disturbance, activity and a loss of tranquillity. As a result of this development there will be a reduction in tranquillity as a result of increased lighting and noise.

Natural beauty is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries. These concerns are widely reflected in the themes in the publicly lodged concerns about impacts of the development.

The current application, impinging unnecessarily on a valued landscape and the character of the area, fails to conserve and enhance the natural and cultural heritage of the AONB in any way that has been articulated. In doing so, it degrades the economic and social well-being of local communities in ways which do not contribute to the conservation and enhancement of natural beauty.

The siting of the development has further impacts that do not value, sustain and promote the benefits that this extraordinarily unusual site within an AONB provides for host communities, including clean air and water, tranquility and improvements in health and wellbeing. In all these respects the proposal singularly fails to reach a credible high threshold for area-based sustainable development, failing to achieve recognition that the development is approached as a 'working' landscape, that integrates countryside management with engaging and working with local communities to secure common goals.

As admitted by Gravesham Borough Council, the application site sits intrusively at the apex of the site, and is integral to the nearby settlement where it is uniquely integrated into the village (as compared to Meopham, Cobham, Istead Rise and Shorne) by virtue of it representing a 'window to the AONB'. As a result, the consultation responses indicate it is a landscape cherished and rightly held in the highest esteem by those who visit, live, and work there, or nearby, and as well as by those who influence its future. Residents and

visitors to Sole Street, Cobham and Luddesdown know where the AONB is and they understand its character and qualities, and their objections are clearly intended to help deliver the purposes of its designation. It is a demonstrable fact that pastoral landscapes are a particularly valued component of Kent Downs.

Objections identify that the most important attributes of natural beauty in the Kent Downs are impacted by the applicant's proposal, such as ancient lanes and paths (Gold Street, NS190, and others), historic settlements, including buildings over 300 years old and hedgerows that contribute the areas character and vernacular. The intrusion of the development within the 'window to the AONB' negatively impacts a vista and landscape that the public knows and admires for its scenery and views, wildlife, the PROW network, peace and quiet, village life, dark skies and exceptional scenic beauty.

Therefore, alternative locations that are not to the detriment of priorities like conserving tranquility, avoiding the loss of scenic beauty, the protection of dark night skies, the avoidance of introducing disturbance and the enjoyment of peace of quiet should be encouraged and the greatest weight given not only to conserving them, but furthering and enhancing them.

[LLC1 – LLC7] [FL1 – FL10] [HCH1 – HCH7]

4. Tranquillity



Pastoral landscape adjacent to proposed site of winery/bottling facility and existing settlement

Of all the local villages in Gravesham, the perception of being away from the noise, sights and smells of modern life is an especially much-valued feature of the area between Luddesdown and Sole Street, and indeed of Sole Street itself. There is a strong ‘time depth’ to the local landscape and its setting which adds to its distinctive, ancient feel.

Mr R Pierce, Inspector for the Public Inquiry into proposal from the Ministry of Defence to develop 630 acres of the Luddesdown area, commented, ***“I am in no doubt that the area is one of particular sensitivity. Above all it has beauty and tranquillity; qualities which in accordance with the relevant planning policies should be preserved and enhanced for the benefit and enjoyment of the public.”*** The Secretary of State for the Environment was also in agreement. Gravesham Councils Assistant Planning Officer at the time, Mr David Lavender added, “While the MoD appears to have demonstrated for itself a need for this land to be used for military training, the Ministry has failed to appreciate that there is another compelling demand for it from a great many recreational and amenity interests.”

A newspaper report from 1991 notes that, “To the outsider, little might appear to have changed in Luddesdown in centuries”. The Parish Councillor, Ron Dubbins, remarked, “We continue to share an appreciation of the beauty and tranquillity of our surroundings and their value to other people who wish to visit the area to enjoy peaceful recreation.”. he further added, “The Parish Council, with the support of Gravesham Borough Council, continues as a matter of policy to safeguard this area from all undesirable intrusion or

development so as to maintain it as a ‘green lung’ for the benefit of all who wish to enjoy the peace of the countryside.’ The quality of tranquillity therefore is well documented and regarded. The time depth of this quality is attested to by Hasted in his authoritative *History and Topographical Survey of the County of Kent, Volume III*, published in 1797.

The area enjoys elevated levels of both relative and absolute tranquility. For instance, the tranquility promoted by the vista of a sunrise on a calm day over the apex of the site and viewed from Sole Street may be close to absolute, with almost no disturbance of any kind detracting from that state of mind. Yet at other times the benefit to people of relative tranquility may also be remarkably high. Both sorts are important to recognize and value as it is recognised that Kent has lost over 20% of its tranquil areas to urban sprawl, traffic and light pollution and the average size of our tranquil areas has reduced by 73%. This is therefore more important as it is increasingly under threat.

Our survey data reinforces that tranquillity is distinctive hallmark of the area, and there is a very high sensitivity to this factor. The tranquillity score was rated on an analogue scale from 0-100, and the mean score of 127 respondents was 96. Tranquillity was also one of the most frequent descriptors in the analysis of the free text responses.

An accepted and often valued part of living in or visiting the countryside has always been dark, star-filled skies. These qualities are increasingly difficult to enjoy outside the AONB, while there are parts of the Kent Downs which benefit from truly dark skies, policy states it is important to seek to both protect and extend these. This becomes crucial where development is proposed at the juxtaposition of a settlement that enjoys a ‘window to the AONB,’ and all the associated positive qualities and characteristics identified within this report and highlighted in the 320 objections. As a result, Gravesham Borough Council will be acting lawfully by refusing this application by recognizing and protecting this as an area of tranquility which has remained undisturbed by noise and is also prized for its recreational and amenity value.

Review of the application of appropriate design guidance and position statements within the Kent Downs AONB Design Handbook indicate the development fails to conserve the local character, qualities, distinctiveness, and natural resources of the ‘window to the AONB’, notwithstanding ‘facts on the ground’ such the design, scale, siting, landscaping and materials, and numerous other impacts detailed by objectors. Those objections provide a valuable indication that the proposal cannot be held out to further and enhance the tranquillity of the Kent Downs AONB, rather, they detract from it.

To further and enhance the particular historic and locally distinctive character of rural settlements and buildings of the Kent Downs AONB, and those adjacent to it, must be maintained and strengthened, using avoidance as the first step in the mitigation hierarchy. Any unavoidable development should be expected to fit unobtrusively into the landscape, respect landscape character, be mitigated by sympathetic landscape, buffering, land bridges and design measures and provide compensatory measure through benefits to natural beauty elsewhere in the AONB.

The general setting and relationship between buildings in farmsteads and immediate landscape around farm buildings is becoming more ‘suburbanised’ and the visibility and impact of this should be avoided and not encouraged. Vineyards are, as matter of fact, recognised as a rapidly increasing component of fruit growing in the Kent Downs and there is a known risk of them being landscape detractors where they are in prominent positions in the landscape and by their nature tending to be highly visible. Further risks with this specific type of development, are as a matter of fact, those associated with viticulture, including the establishment of wineries with agri-tourism, visitor centres, ancillary events (e.g. weddings, parties, social functions) and provision for workers which can be landscape detractors.

The concept of landscape encompasses much more than nature and landform and if we conserve and enhance this cultural landscape the determination must encompass wider components of landscape, including tangible and intangible cultural heritage. By affording adequate focus to the historic and cultural heritage of the landscape the fundamental objective of the AONB is met; being recognised and valued, is more likely to be achieved, as is its conservation and enhancement. **Public consultation serves this purpose.**

5. Health & Wellbeing



The evidence is clear that there are multiple physical and mental health benefits from access and contact with beautiful places; these range from just feeling enlivened after a walk in the open air to significant therapeutic interventions for those with dementia, those who have experienced trauma or, for instance, suffer from cardio-vascular disease. The need to attach people to place and landscape heritage is greater where an increasing proportion of the population are not directly involved in landscape management.

Furthermore, the evidence is clear that older populations place greater emphasis on quality of life, not quantity, and prize outdoor pursuits, quiet enjoyment, and hobbies such as gardening and walking.

Opportunities to enhance the health and wellbeing of communities and individuals both within and around the Kent Downs AONB should be actively pursued to increase provision and better bring together and coordinate provision of health and wellbeing 'assets' in local settings within the AONB. The introduction of landscape detractors that result in a moderately adverse visual impact and introduce hazards and risks to pedestrians undermines this objective.

Landscape management practices, plans and policies must seek to enhance the clean air benefits that the Kent Downs AONB offers recipient populations. It is recognised that agriculture, transport, and industry are important contributors to air pollution, agriculture being responsible for ammonia and nitrogen emissions as well as carbon dioxide.

The opportunity to experience 'open air' - clean, fresh air is an important natural and perceptual quality of the Downs; it adds to the health and wellbeing that the AONB provides to residents and visitors. The landscape and vegetation pattern is particularly important in the air pollution reduction it achieves close to beneficiary populations.

Diffuse pollution from agricultural sources causes nutrient enrichment, reduced water and elevated levels of silt and pesticides. There is a need to reduce air pollution from transport and agriculture in the Kent Downs so a safe, clean environment is protected, conserved, and enhanced, where residents, visitors and nearby populations benefit from essential ecosystem services and increased well-being and quality of life.

Respondents to the survey, particularly in relation to living near the proposed site, or walking in the area expressed the psychological benefits on their wellbeing of tranquillity, being near nature, away from landscape detractors such as artificial or man-made sources of disturbance. This was particularly evident in the free text comments, and those relating to the public footpaths and recreational activities and

[VC1 – VC11]

6. Overuse of Land Capacity



There are recognised risks from ‘over visiting’ across the AONB particularly in countryside with heritage sites or where tourism, including agri-tourism, is actively pursued. Visitor site car parks are often full by mid-morning on a sunny weekend and the visitor experience becomes at risk of declining, along with erosion to paths, damage to the historic, natural, and cultural heritage as well as loss of tranquility.

There is an opportunity and demonstrable need to sustainably manage the numbers, impact and income from visitors to benefit local people, local services and support the conservation and enhancement of the AONB landscape. Some areas within the AONB suffer either from over capacity or overuse, leading to a detrimental impact on both the landscape character and qualities, visitor experience and host communities. The objections and survey responses to this Application demonstrate a thriving, diverse, vibrant, welcoming community that understands, recognises and values the special qualities of the AONB and plays an active role in its conservation and enhancement while reducing their environmental impact.

The current application fails to pursue health and wellbeing benefits offered to communities and individuals, or positive and sustainable links between the Kent Downs AONB (landscape, communities, and partnership) and nearby communities. It also fails to evidence how the development of sustainable visitor and tourism facilities will be pursued where they enhance people’s enjoyment and understanding of the AONB without detracting from its special characteristics and qualities.

[VC1 – VC11]

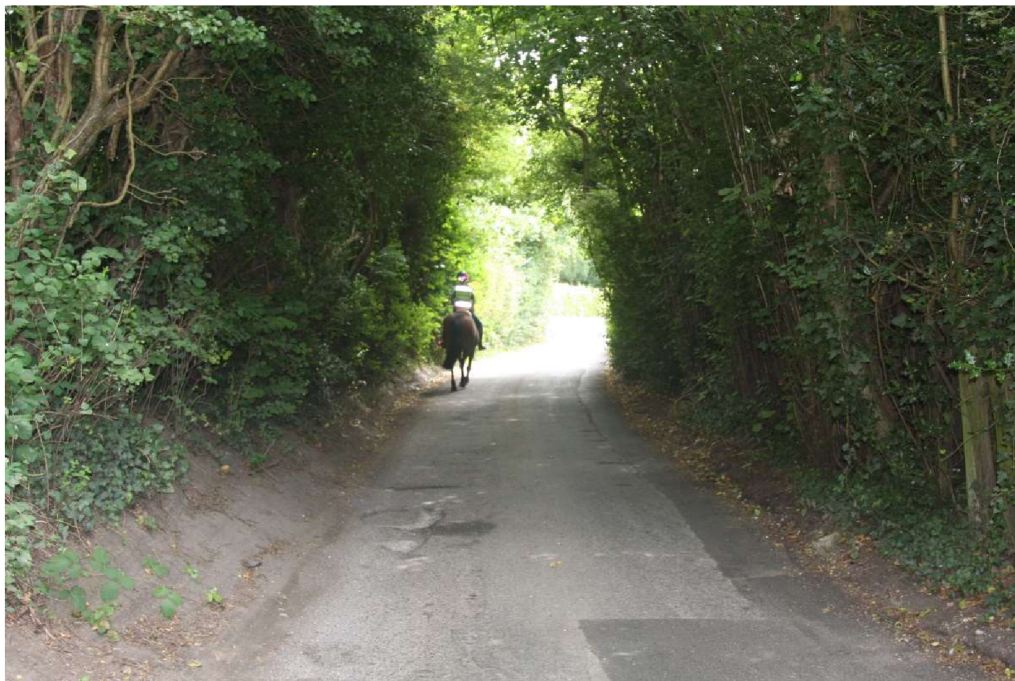
7. Traffic

Traffic generation is a recognised developmental risk resulting from viticulture in the AONB, including from agri-tourism and other ancillary forms of revenue generation that arise from it. As there are no existing buildings at the proposed site the absence of evidence in relation to the impacts and risks is concerning.

Traffic, including that arising from ancillary activities also presents a risk to those using public rights of way. NS190 is bisected by traffic entering the field gate and travelling to the site and there is no visibility for the pedestrian or the vehicle operator. Serious injury, or worse, is possible.

Horse riding, like cycling and walking is increasingly difficult and dangerous on rural roads because of the volume and speed of traffic and the bridleway network in Kent is limited. The KCC road safety rural campaign states that rural roads account for 3/5 of road fatalities, which are focused on roads to and from urban areas.

The application fails to address how sustainable solutions to problems of rural traffic will be supported, particularly in rural settlements or where there is a conflict with landscape quality or walkers, cyclists, and horse riders. The application fails to evidence alignment with policies relating to the use of road signage, furniture, design, and maintenance that conserves and enhances the local character and distinctiveness.



8. Ecology

The location of the applicant's proposed site is adjacent to a wildflower meadow that forms the foreground of the 'window to the AONB'. There is concern regarding the risk and impact upon several beautiful rarities that are known to occur in the AONB, such as the lady, monkey and late spider orchids, black veined and straw belle moths as well as rare arable field wildflowers. Other rare and threatened species occur in good numbers in the AONB ; for example, the dormouse, the edible or Roman snail, the adder and rare arable field wildflowers along with several butterflies associated with downland. Badgers, bats, newts and other protected species are common place. An independent report for the South Downs National Park on viticulture recognised that the delicate ecosystems and landscape character of protected landscapes can be harmed by vineyards and winery related infrastructure if not carefully managed.

The survey indicates that there is a presence of a surprisingly diverse range of wildlife around the proposed site and its presence is highly valued by the community and contributes to a sense of place. This is also linked to a very high appreciation for the semi-natural ruggedness of the terrain, with a lack of man-made artefacts and un-spoilt hills and open landscape.

There is no evidence how local, regional, and national biodiversity targets and spatial priorities for habitats and species distinctive to the Kent Downs will be supported; nor how the protection, conservation, enhancement, and extension of Kent Downs AONB priority and distinctive habitats and species will be pursued. There is an absence of evidence that the Application pursues a greater connection between people and nature at the same time as dispersal of visitor pressure from sensitive wildlife sites where the biodiversity interest is at threat. Without evidence to this effect the environmental impact upon AONB communities cannot be held to be stabilised and reduced. It is also noted that the vegetation in the area is entirely deciduous. Therefore, the proposed screening cannot maintain adequate cover for half the year in a highly prominent location.

We note the Application does not propose to use locally available, sustainably sourced traditional as well as appropriate new materials and a genuine design approach which fits neatly with and complements the valued traditions, forms, and patterns of the past, while securing environmental efficiency and affordability. It is an exceptionally large modern steel shed for which no traditional Kentish agricultural comparator exists and is out of keeping with the local historical vernacular – the buildings on Gold Street are genuine historic farm buildings constructed from period materials with Kent peg tiles etc. This

another reason why the adverse impacts on the landscape should be avoided by siting it elsewhere on the declared land holdings.

The lack of reference to renewable and sustainable energy initiatives and energy efficiency measures, where they help to conserve and enhance the natural beauty and landscape character of the Kent Downs AONB and bring environmental, social and economic benefits to local people, is a concern. The application should be resisted where it is not possible to determine how it accords with the Kent Downs AONB Renewable Energy Position Statement. Similarly, as the proposal fails to conserve and enhance tranquility and where possible dark night skies, there is a statutory basis for refusal.

The prevalence of fruit farming in Kent and the Kent Downs AONB, along with increasingly uncertain climatic conditions creates a strong demand for irrigation; this creates an additional significant pressure in an already stressed water environment. We note a lack of any documentation regarding this. Further, the building is sited across significant elevation contours resulting in unnecessary erosion of the landscape and a reduction in visual quality.

[BD1 – BD9] [GNR1 – GNR9]

9. Viticulture Specific Considerations

The results of our survey evidence many known concerns that arise with viticulture in general and also with poor siting as identified in a report and survey for the South Downs National Park (see references). The concerns are:

- *Negative impacts on protected landscape characters, where vineyard and winery location, and their scale, are critical variables in assessing impact risks*
- *The scale of the receiving landscape and the proposed business is important.*
- *Key viewpoints could be impacted by an increase in vineyard numbers or scale, although this is a similar risk to that seen in SDNP*
- *Key report recommendations for producers include conserving special views*
- *The environmental and landscape impact of vineyards and wine production in sensitive landscapes has the potential to be high unless well managed.*
- *Tranquillity, one of the key features of the protected landscapes, was deemed to be lower with viticulture compared with that of the land uses it often replaces.*
- *Landscape impacts associated with wineries and related infrastructure are likely to be case-specific and very much a matter of location and scale. Any planning application in the SDNP will go through a thorough process of evaluation and will need to be shown to be landscape-Led taking into account the full range of potential environmental impacts in both its establishment and operation.*
- *Landscape and visual factors will need to be assessed against the existing baseline of the local landscape character and address the specific sensitivities found that could include particularly valuable areas of landscape and key views.*
- *There is debate around which aspects of viticulture, vineyards, wineries and wine production are generally positive and which could be potentially harmful from a landscape and visual impact perspective. This is not surprising given the sensitivity and designated status of the landscape within the National Park, its special qualities and the proximity of people to rural areas within it.*
- *Winery operators should consider local residents, noise impacts and potential noise mitigants. Likewise, noise from vehicle movements and visitors, and any restrictions or mitigants, are likely to be addressed through the planning process.*
- *The delicate ecosystems and landscape character of protected landscapes can be harmed by vineyards and winery related infrastructure if not carefully managed.*
- *It will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to*

make a location more sustainable sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist.

- One of the key environmental hazards when applying pesticides in vineyards is the contamination of bodies of water.
- Established vineyards make a minimum of 6 and a maximum of 15 pesticide applications annually, averaging 10.5 sprays per year.
- Wine making does have the potential to impact the environment in terms of pollution and GHG emissions where by-products (including wastewater) are not managed effectively.
- Wineries, storage/ageing facilities, ancillary facilities (e.g. cafés, tasting rooms, restaurants and offices), access routes, parking, on-site utilities, staff and visitors all impact the environment in terms of infrastructure, buildings, vehicle movements, noise and light.
- Often the process of loading presses is done manually but may be aided by hoppers and conveyor systems or, where larger bins are used, forklift trucks. This activity often takes place at the entrance to or just inside a winery building or press house, or outside under temporary cover.
- The wine production process does have the potential to impact the environment in terms of pollution and GHG emissions if by-products (including wastewater) are not effectively managed wineries, storage facilities, ageing facilities, ancillary facilities (e.g. cafés, tasting rooms, restaurants, offices), access routes, parking, on-site utilities, staff and visitors all impact the environment in terms of infrastructure, buildings, vehicle movements, noise and light.
- Pesticide applications in conventionally managed vineyards are higher than for arable crops (0.74 kg/spray ha versus 0.34 kg/spray ha) with sulphur accounting for the bulk of this.
- Viticulture has less compliance procedures in place and is less regulated than some other forms of crop production.
- In vineyards, the main noise comes from tractors and associated equipment used for various activities including mowing, spraying and harvesting.
- Protected areas with higher levels of tranquillity may be unsuitable for vineyards and wineries.
- By far the most common pesticide applied (an average of 5.7 times / season, maximum 10 times / season) was sulphur, a naturally occurring substance that has been used as a plant protection product for thousands of years. Sulphur is a non-

systemic contact and protectant fungicide with secondary acaricidal activity. However, its level of systemic toxicity to humans is high.

- Pesticide applications in vineyards are higher in terms of volume/spray ha than in arable/cereal farming up to 20 applications per year in an AONB vineyard
- Viticulture has fewer compliance procedures in place and is less regulated than other forms of crop production, potentially due to the historic lack of a requirement from the end customer of an audit scheme conventional viticulture in the UK uses more pesticides overall than conventional arable farming, with sulphur accounting for the bulk of this:
 - Vines: 0.74 kg/spray hectare; and,
 - Wheat: 0.35 kg/spray hectare (overall arable crops 0.34 kg /spray ha).
- CO₂ is a by-product of fermentation and indeed a significant health and safety consideration for wineries and staff working in them (it can be a killer).
- Within the wine production process, however, water consumption can be significant, with estimates ranging between 1.5 to 14.8L/litre of wine (WRAP, 2012).
- Other important considerations relate to the treatment and disposal of 'toxic' wastewater.
- The high organic and salt content in winery wastewater, if leached into groundwater or waterways, can cause eutrophication. It can also significantly negatively affect soils and soil microorganisms.
- Noise from wineries is usually restricted to vehicle movements, people, and chillers or presses being operated (presses at harvest time). People and day-to-day activities that result in noise during the winemaking process are often located within winery buildings. At harvest (which can take 1 to 4 weeks, depending on winery scale), crushing and pressing may take place at the entrance to a winery or just outside a building envelope. The resulting noise volume will depend on a multitude of factors (press types, press cycles, whether muffled compressors are used, physical location, number of operators etc.) but is generally very low and often considered during the planning process.
- There are many different sources of noise in agriculture, ranging from large equipment such as combine harvesters and heavy load tractors to animal noise and even shotguns. The degree and frequency of noise generated depends on the type of agriculture, the time of year and the equipment being used. In vineyards, as with agriculture, the main noise comes from tractors.
- Flail mowers (average working level noise 88 Db), trimmers and sprayers (orchard 97.9 Db /misc. 87.2 Db) are also used in vineyards.

- Where vineyards differ compared with many other forms of agriculture is that the number of operations (passes) and people working in the landscape is higher, as viticulture remains a manually intensive activity.
- Based on the SDNP vineyard survey, the average number tractor hours per annum was 71.25 hours/hectare/year, equivalent to about 10 days per year, including harvest. These tractor movements include mowing, spraying and harvesting (September – October).
- Noise can also be generated by those working in the vineyard; this would be more prevalent during pruning and tucking, and harvest.
- Within the SDNP, tranquillity is a core attribute and, in 2017, relative scores were attributed to different locations (Figure 29). Tranquillity is not purely about noise – that is the quantifiable/measurable aspect of it – but tranquillity and other related perceptual qualities are a fundamental part of landscape character and sense of place. Many of the areas with higher levels of tranquillity are unsuitable for vineyards (e.g. the tops of the downs), but other, more terrestrially suitable areas (see Sections 8 and 12, where this Figure is repeated) are in locations with >medium (approximately 0) tranquillity scores.
- Vineyards are intensively managed compared with the management of the land use they often replace; they are truly a working landscape and therefore their impact on tranquillity (a key component of much of the SDNP – see Section 12) can be greater.
- Vineyard scale, people's perceptions, subjective and objective viewpoints and landscape change are all important elements to evaluate in assessing the impact of any growth in viticulture.
- There are also other activities/impacts that can be associated with vineyards, such as events, tours and a higher presence of human interaction, than was the case with previous land uses.
- These can have significant effects on landscape and visual qualities, including tranquillity (see noise impacts in Section 10.7).
- As the UK viticulture sector has matured through the last decade or so, bespoke designed wineries have been established with point-of-sale facilities (including tasting rooms, catering, conference facilities, accommodation, etc.), intended to create an integrated production/wine tourism offer.
- They may have landscape and visual impacts including from car parking, access routes (possibly new access routes/tracks/roads), services (and installation thereof), traffic movements, and hospitality/offices for staff.

- To address any loss of openness, key views and public rights of way should be respected to minimise any negative effects on the experience of the user.
- With regards to tranquillity, vineyards deliver less ecosystem service benefits as they require more intensive management.
- Vineyards are generally more intensively managed compared with the management of the land they often replace and can therefore impart a reduction in tranquillity. The sense of tranquillity may be further encroached upon by winery related developments/infrastructure and operations.
- This includes noise from equipment, management activities and vehicle movements, and lighting that can negatively impact the SDNP's dark skies at night.
- Increased traffic and visitors can cause noise, nuisance and congestion
- Air quality can be reduced due to emissions from vineyard equipment.
- Vineyards are more intensively managed than arable or pastureland.
- Where wineries attract and encourage tourism, this can significantly impact local communities, both positively, e.g. through increased employment, but also negatively, e.g. through reduced tranquillity.
- Vineyards have a much higher labour intensity (0.17 FTEs/ha) than either cereal (0.01 FTEs/ha) or lowland grazing (0.02 FTEs/ha). Vineyard management requires significant time to undertake labour-intensive, manual operations, unlike the highly mechanised and larger scale processes found in arable production.
- There were significant concerns in relation to environmental impacts, i.e. pesticide/herbicide use, water use, noise and increased vehicle movements.
- From a social perspective, their key concern was vineyards/wineries being used as tourist attractions and associated reduced tranquillity.
- Viewsheds are important to the local communities and vineyards should avoid being planted on high ground where their potential to impact views is greater.
- From a social perspective, the key concern was in relation to vineyards/wineries used as tourist attractions. This was seen to have a significant impact on the local population, with reduced tranquillity. It was suggested reductions in tranquillity would come from increased.
- Noise from functions (e.g. weddings), increased traffic movements from visitors on roads, and light pollution. However, it was acknowledged that these concerns are generally managed through planning restrictions.
- By their nature, vineyards and wineries highlight active human intervention in the landscape.

- Whilst most stakeholders engaged with during this study were generally very supportive of vineyards and wine production in the SDNP (see Section 14), their potential harmful influence on the landscape and environment was of concern to many. Vineyards were described by some stakeholders as ‘industrial’, ‘polluting’, ‘scarring’ and were associated more with harm than good.
- Vineyards are generally more intensively managed compared with the management of the land they often replace and can therefore impart a reduction in tranquillity.
- The sense of tranquillity may be further diminished by winery related developments/infrastructure and operations due to equipment noise, management activities and vehicle movements and lighting, which could also negatively impact the SDNP’s dark skies at night.
- When ‘designing’ a vineyard in the National Parks or AONBs, due care and consideration should be made to its visual impact to inform mitigation actions.
- Winemaking operations should be planned with impacts on highways and traffic in mind. General site access and servicing, access for large vehicles and the delivery of oversized items (e.g. wine tanks, offsite construction items) should be considered.
- Where any form of wine tourism is planned, appropriate allowances will be required for car (and potentially coach) parking. Sensitive landscape designs may need to be considered to mitigate the visual impact of large areas of parking and access roads.
- However, seasonal activities such as bottling, the pressing of grapes, and vehicular movements are potential issues that may need to be considered. Heat pumps, which are required to maintain a constant temperature in the wine tanks, may be a source of nuisance if they are located without due consideration to adjacent properties or sensitive locations such as a Public Right of Way.
- Light pollution from artificial lighting is a sensitive issue in the countryside, particularly within a National Park or AONB. Dark Skies policies provide helpful guidance as to what is acceptable.
- PROWs need to be maintained but could be fenced through vineyards or along vineyard boundaries, creating a hitherto sense of enclosure and constriction which would be a change from walking through or around an unfenced pasture or arable field. Views may be blocked or channelled in such cases and the experience of using the PROW considerably changed. It is recommended that vineyards are designed with PROWs taken into consideration, potentially providing wider field/fence margins or accommodating PROWs within the vineyard environment.

10. Penultimate Comments

The areas of conflict between this Application and the Kent Downs AONB guidance together with the findings of the GVLIA3 based survey indicate that the chosen site and surrounding are of high susceptibility to change and are, de facto, of high value. It is clear that approving the siting of this development would have permanent and very substantial / seriously adverse effects on the landscape and community. The geographical extent of the impact is large (by virtue of the applicant seeking long reaching views) and affected Public Rights of Way are numerous, being impacted up to 1.3km away, with safety concerns for users.

Adverse effects would be at both higher and lower levels (area, village, site and adjoining properties), and result in cumulative loss of landscape features, biodiversity, tranquility and character, and introduce further sub-urbanisation due to incremental, poorly located and designed and badly screened development, visitor pressure and leisure uses, intensive agricultural management practices and noticeable and significant pressure from traffic. These effects mirror those within an assessment of viticulture in Areas of Outstanding Natural beauty where stakeholders had concerns about negative impacts on protected landscape characters, where vineyard and winery location, and their scale, are critical variables in assessing impact risks. A key report recommendation was conserving special views. It will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable.

This is in addition to impacts from the application site on the dark night skies that are a feature of some parts of the Kent Downs and are a valued part of the experience of tranquil rural areas. The quality of the setting of the AONB particularly in the experience of views is recognised as important in the original designation and in the enjoyment of the landscape today and we therefore request that Gravesham Borough Council consult the advice of AONB board in ensuring the application is refused in accordance with its duty of regard.

The character and distinctiveness of villages, farmsteads and individual buildings are conserved and enhanced by combining the best traditions of the past with the best technologies of the present to create environmentally sustainable and locally enhancing development.

It is vital that a manifestly tranquil environment is protected, conserved, and enhanced, and individual or cumulative development and change that does not contribute to the conservation and enhancement of the AONB, and 'window to the AONB', is refused.

The survey results represent the only snapshot of stakeholder evidence of the landscape and visual impact of the proposal on the local area. There is no other avenue by which this can be ascertained, and this exercise has never been previously carried out. The results of the survey emphasise two major points that should not be lost on a municipally based planning department.

Firstly, this is truly and ancient part of the country, and there is a strong sense of place. All the factors in the survey contribute to this. Secondly, the people here are very attached to their land. It is no surprise. It is, by any standard, beautiful, and has been curated for over 1000 years. The survey results speak of an impressive and symbiotic relationship between the people and the land. Many of the responses have a deep, poetic quality and moving to read. There is one abiding value that prevails – a deep love of the English countryside.

This document conveys a glimpse into the sensibility of country life in a unique and niche community that has lived here for a millennium. This is a real thing. It is the experiential aspect of those who live with the land and tell the story of a living landscape. Real people live here. They are the people of the hills.

This is a National Landscape for exceptionally good reasons. Anyone purchasing a Grade I/II listed property would know they would be limited in what they would be permitted to do because of where they choose to be. A National Landscape is no different. The beauty and gift of the land to the people comes first. The only question is the extent of the democratic deficit.

It is right and fitting that this document closes with a summary of the views of the community, from their voices. They deserve to be heard.

11. Sentient Analysis of Natural Beauty and Community Sentiment

The passage reflects a profound emotional and spiritual connection to a rural landscape, characterized by its tranquillity, natural beauty, and ecological significance. The voices articulated within this text reveal a deep-seated appreciation for the environment, indicating that the area serves not just as a physical space, but as a sanctuary for mental well-being and communal identity.

Themes of Tranquillity and Natural Beauty

The predominant theme is tranquillity, frequently echoed through descriptors such as "peaceful," "calm," and "unspoiled." The landscape's natural attributes, including open fields, rolling hills, and diverse wildlife, evoke a sense of serenity that many residents cherish. The text suggests that this environment acts as a counterbalance to the stresses of modern life, offering an escape where individuals can reconnect with nature. The mention of sunsets, bird song, and unobstructed views accentuates the beauty that resonates with those who live there. Such vivid imagery fosters a collective sentiment of belonging and appreciation.

Ecological Consciousness

Another significant aspect is the awareness of ecological biodiversity. The text conveys a strong argument against urban encroachment, warning that increased development could disrupt local ecosystems and diminish species diversity. This concern underscores a broader ecological ethos, recognizing the intrinsic value of preserving natural habitats not only for current residents but also for future generations. The calls for protection emphasize a community invested in sustainability, highlighting the interconnectedness of human well-being and environmental health.

Historical and Cultural Significance

The passage reflects a deep-rooted historical and cultural identity tied to the landscape. References to orchards, traditional farming, and long-standing community practices reveal a connection that spans generations. This continuity provides a sense of stability and belonging, with many expressing pride in their heritage. The shared memories of family walks, seasonal changes, and local wildlife create a narrative that is both personal and collective, enhancing the area's cultural tapestry.

Resistance to Inappropriately Located Development

A significant portion of the sentiment is devoted to resistance against proposed developments, particularly those deemed incongruous with the rural character of the landscape. The community expresses a fear that industrialization would disrupt the area's peace and beauty, labelling such projects as "unacceptable intrusions." The area is regarded as a valued landscape and the landscape views are described as 'iconic', unique or distinctive to the setting. This resistance highlights a broader tension between economic development and environmental conservation, revealing that residents prioritize the preservation of their environment over potential financial gains.

Mental Health and Well-Being

The recurring theme of mental well-being further amplifies the landscape's significance. Many contributors articulate how the serene surroundings contribute positively to their mental health, providing a refuge from the chaos of urban life. This connection between nature and well-being is a powerful reminder of the therapeutic qualities of green spaces, reinforcing the notion that preserving such landscapes is vital not just for ecological reasons but for the psychological health of the community.

Conclusion

Overall, the sentiments expressed reflect a community deeply attuned to the value of their natural surroundings. The landscape is seen not only as a physical space but as a vital component of their identity, history, and mental well-being. The commitment to preserving this unspoiled beauty against poorly located commercial pressures underscores a collective desire to maintain a harmonious balance between nature and human habitation that has existed for many hundreds of years. This analysis highlights the intrinsic relationship between people and their environment, emphasizing the importance of protecting valued landscapes that foster community, health, and ecological diversity.



From the existing entrance the proposed site on the horizon and sensitive ridge line on the National Landscape would be silhouetted by the sun and visible at other times

River Valleys	20%	21%	19%	13%
Orchards/Cobnut Platts	21%	17%	14%	12%
Dry Valleys	7%	7%	8%	11%
Historic Parklands	6%	9%	7%	9%
Most valued features of the Kent Downs AONB	2003	2008	2013	2019
Scenery and Views	86%	83%	79%	74%
Wildlife	49%	48%	39%	58%
PROW Network	n/a	41%	45%	47%
Peace and Quiet	46%	49%	39%	45%
Villages and Village Life	32%	32%	29%	21%
Outdoor Recreation	33%	10%	12%	16%
Historic Buildings	24%	17%	14%	13%
Dark Skies	n/a	6%	7%	12%
Available Local Produce	7%	8%	5%	6%
Amenities	10%	8%	7%	4%
Visitor Attractions	n/a	n/a	7%	4%
Locally Distinct Highways	n/a	1%	3%	2%
Priorities for Action	2003	2008	2013	2019
Conserving Wildlife	54%	63%	59%	69%
Prevention of Illegal Activities	56%	77%	71%	62%
Conserving Tranquillity	38%	36%	43%	59%
Conserving Views and Scenic Beauty	50%	55%	56%	53%
Preventing Loss of Historic Buildings	8%	22%	20%	22%
Research and Response to Climate Change	n/a	12%	7%	12%
Information about Access to Countryside	2%	10%	15%	8%
Information on Features of AONB Landscape	12%	8%	2%	7%
More organised events	9%	6%	8%	5%
Management of Equine Land Use	n/a	8%	5%	4%
Access	n/a	n/a	4%	n/a
Action Needed to Improve Enjoyment of AONB	2003	2008	2013	2019
Encourage farmers to use more environmentally friendly techniques	45%	39%	44%	52%
Ensure Peace and Quiet	29%	64%	50%	50%
Greater Emphasis on Development Control	27%	34%	43%	39%
Improve Sustainable Transport	23%	39%	38%	32%
Highways Management that respects sensitivity of AONB	n/a	23%	22%	27%

RELEVANT STATUTORY POLICIES AND OTHER REFERENCES TO BE READ IN CONJUNCTION WITH THIS DOCUMENT. THESE SHOULD ALL BE DOWNLOADED AND READ IN CONJUNCTION WITH THIS REPORT,

1. Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England. Natural England
2. Guidelines for Landscape and Visual Impact assessment. 3rd Edition
3. Landscape and Visual Impact Assessment of Proposed Allocation Sites in the High Weald. Sally Marsh 14th May 2021
4. TGN Note 20/21 Assessing Landscape Value Outside National Designations
5. Kent Downs AONB Unit. Application By National Highways Requesting Development Consent For The Lower Thames Crossing
6. TGN 5/22. Notes and Clarifications
7. TGN 02/21 Landscape Value and Valued Landscapes
8. TGN 05/23 Notes and Clarifications
9. South Downs National Park Viticulture Growth Impact Assessment
10. West Kent Downs Landscape Character Assessment
11. Kent Downs AONB Management Plan 2021-2026
12. Kent Downs AONB Setting Position Statement
13. Kent Downs AONB Farmstead Guidance
14. Joint Statement on the historic environment in AONBs: The 34 AONBs
15. Kent Downs AONB Landscape Design Handbook