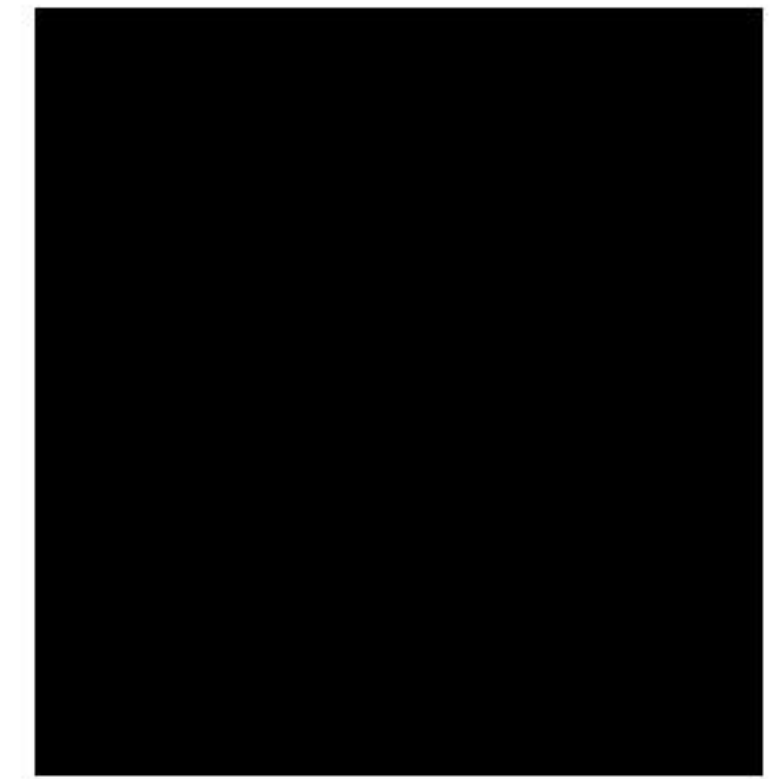


BY HAND



11th February 2025

Gravesham Borough Council – Planning Department
Mr Ethan Bonthron
Civic Centre
Windmill Street
Gravesend
Kent
DA12 1AU

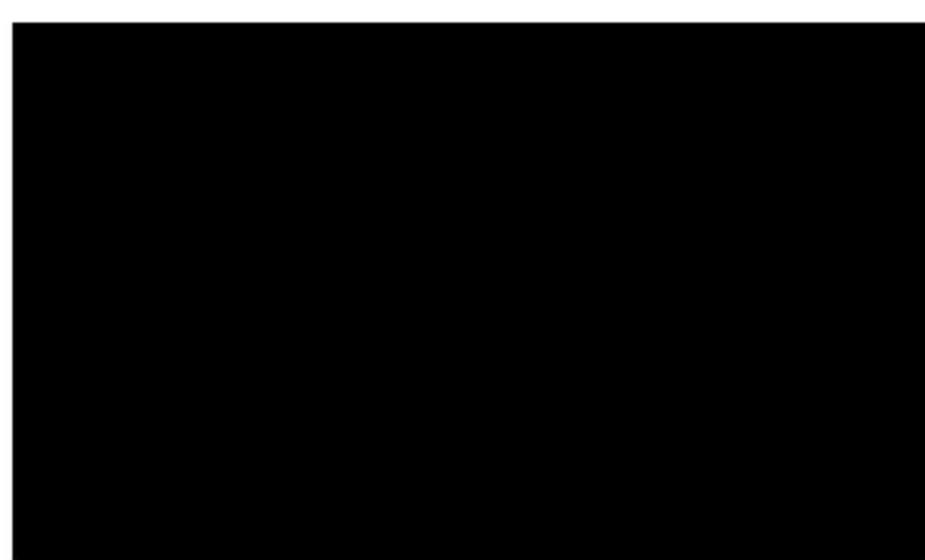
Dear Mr Bonthron

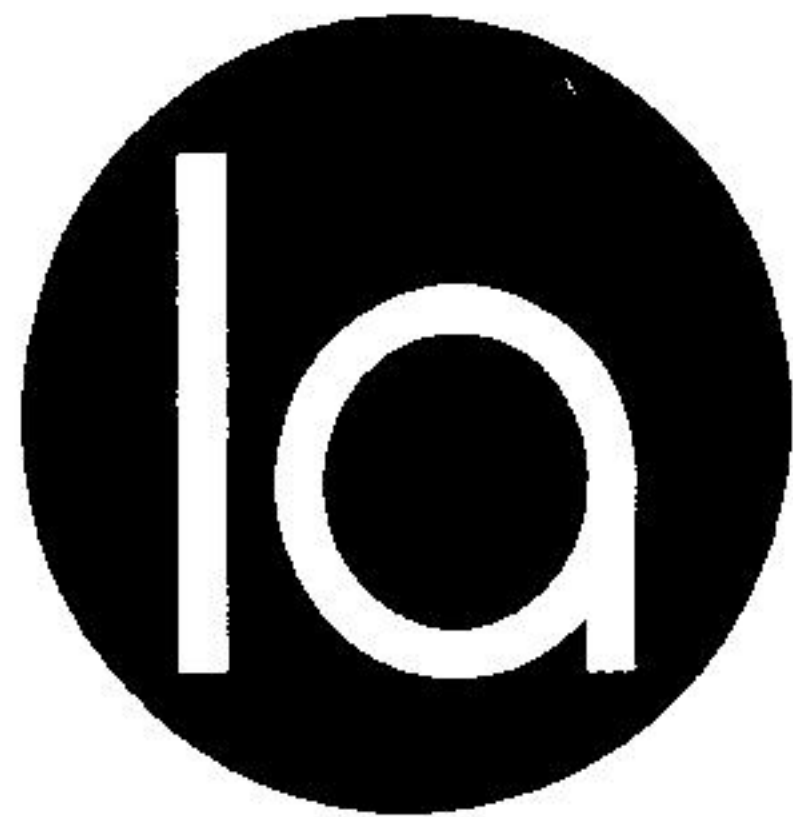
RE: Application Cobham House Vineyard 20240544

I hope this letter finds you well?

Please find enclosed a landscape and Visual report. Please review along with the other reports we have submitted in objection to this application. If you require any further information please do not hesitate to contact me.

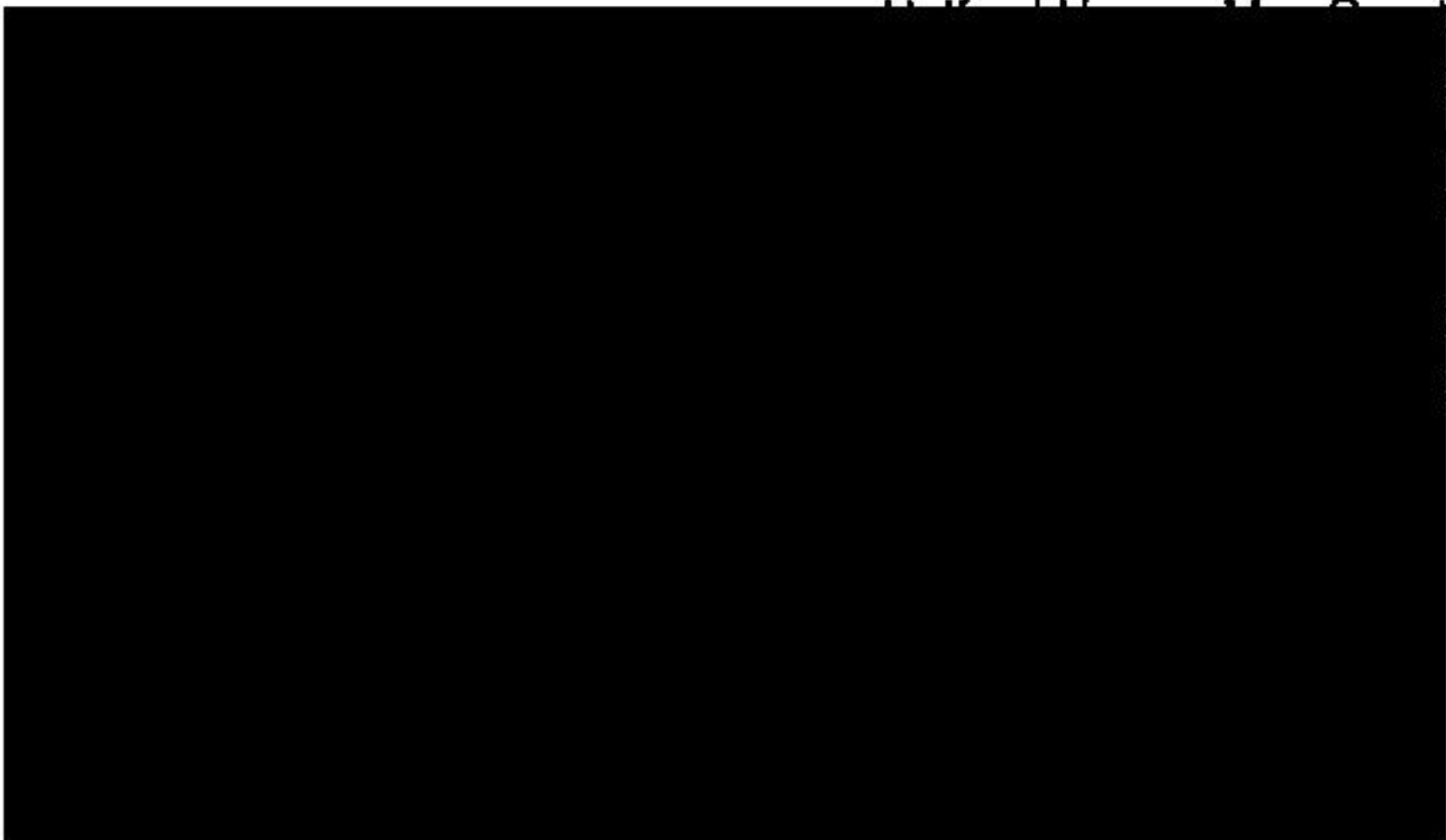
Yours Faithfully





planning | architecture | landscape

laurence associates



**Site Address: Cobham House Vineyard, Gold Street, Sole Street,
Kent, DA12 3AA**

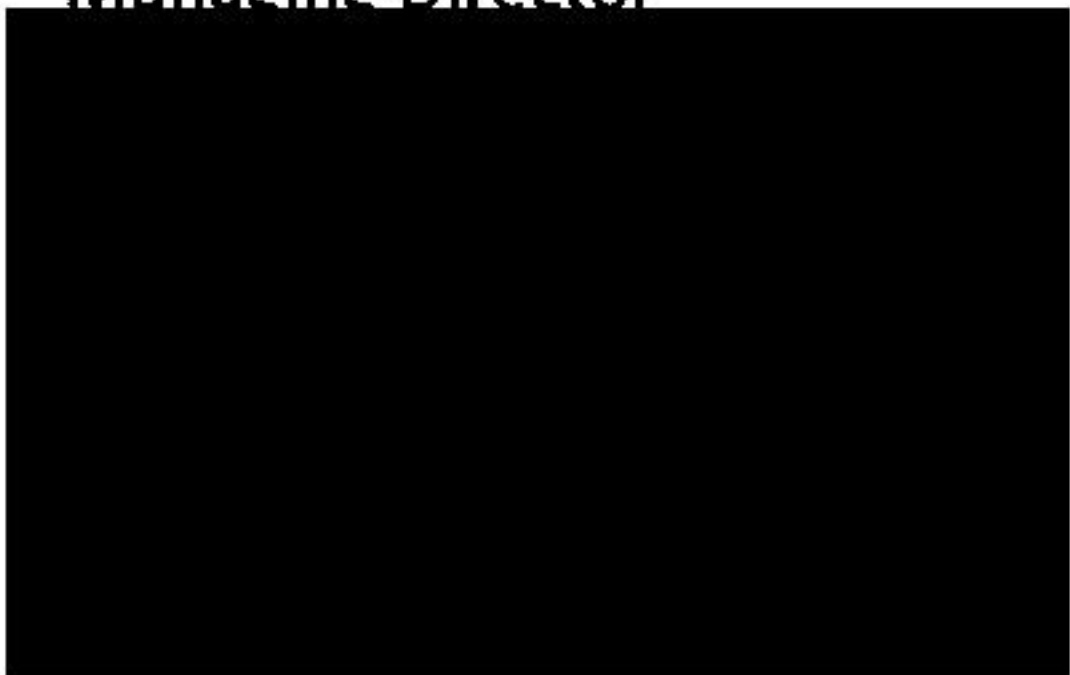
**LANDSCAPE & VISUAL REVIEW
VOLUME 1: REPORT**

Prepared for



Project Reference	24290
Status	Final
Issue / Revision	3
Date	02-12-2024
Prepared by	IM
Checked By	CSR

**Richard Marsden
Managing Director**



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1 INTRODUCTION

1.1 APPOINTMENT AND SCOPE

- 1.1.1 Laurence Associates, Threemilestone, Truro, Cornwall were appointed by [REDACTED], a resident of Sole Street to provide a Review of the Landscape and Visual Impacts associated with the construction of a winery located on the eastern edge of Sole Street and close to the village of Cobham in Kent. The purpose of this review is not to repeat the Landscape and Visual Impact Assessment which the applicants have provided as part of the Prior Approval Application 20240544.
- 1.1.2 This Review will undertake a review of the Landscape and Visual Evidence and Impact Appraisal (LVEIA) prepared by Terra Firma Consultancy Ltd. (August 2024). Additionally, the client has independently organised and undertaken survey work, specifically targeting 3 main areas:
- The Landscape,
 - Public Rights of Way and
 - Traffic.
- 1.1.3 The first 2 surveys will be reviewed to assess if the views of local residents and visitors provide additional information on the value and sensitivities of the landscape and visual receptors, which would not have been available to Terra Firma when undertaking their LVEIA, but which might be considered to change or add additional local information to these aspects of the LVEIA. The consideration of the traffic data, although pertinent to the proposed development as a whole, is beyond the scope of this review.
- 1.1.4 The LVEIA assesses the proposed development as set out in the Prior Approval Application, i.e., just the winery building and associated mitigation planting. However, this represents only part of the overall potential development.
- 1.1.5 As this is not a full planning application, the full impacts of the proposed development cannot be assessed as their remain uncertainties over some aspects of the proposed development; some will be speculative depending on the full use and purpose of the winery, however, others are not and will occur in some form as part of a functioning development if approved. These aspects of the proposed winery development have the potential for impacts on the landscape characteristics and features as well as on tranquillity and the visual amenity for residents and walkers. It is therefore considered that in this overall review of landscape and visual impacts, it is worthwhile raising the potential for impacts, and their likely nature which could arise from the proposed development in full. Consideration in the review is given to the potential cumulative impacts arising from the building and the access drive, which is not part of this application but an inevitable part of any final development plans, therefore an important consideration at this stage of the process.

- 1.1.6 There are other potential parts of the development, i.e., visitor/customer parking and external storage areas and sufficient vehicle manoeuvring around the building, which have also been raised in some reports as either a possibility of the proposed winery functions or as an issue of concern that the scale of the facilities may not be of sufficient capacity, however this review will disregard these matters as being unknown at this stage.
- 1.1.7 In addition, the proposed development will review the landscape character assessments covering this site and local area, along with relevant policies and guidance regarding development and landscape and visual matters of development, both in general and specifically within the Green Belt and the Kent Downs National Landscape.
- 1.1.8 The report concludes a summary of the review of the proposed development within the LVEIA and whether it accords with the various policies concerning development, landscape and visual amenity. An alternative location within the existing application site A will be considered against the same principles.

2 THE SITE & IMMEDIATE CONTEXT

- 2.1.1 The site forms part of the Cobham House Vineyard and is divided into 2 separate parcels of land described as Site Area A, the western section, in which the proposed development is located, is separated from the eastern section, Site Area B by Gold Street which runs from Sole Street in the north, south-east between the 2 parts of the site, crossing the rail line in the south. The eastern parcel of land is bounded by Batt Street which joins Gold Street, along the northern and north-east boundary. The Chatham Main Line Railway borders the southern boundary of both site areas and is set within a deep cutting.
- 2.1.2 The western part of the site slopes gently to the south with the highest part of the site at approximately 98m AOD and descending to approximately 92m AOD in the south adjacent to the rail line. The eastern parcel is a gentler gradient to the south at approximately 96m AOD - 91m AOD.
- 2.1.3 A public Footpath, NS 190, crosses the western site from Gold Street to the south-west, where it crosses the rail line and then intersects with another public footpath running. East to west parallel with the rail line. The footpath crosses open field and is not bordered by hedgerows, thus affording open views of the landscape.
- 2.1.4 Both land parcels are laid out as vineyards, and vineyards and orchards are located in the fields extending to the north of the site. To the south of the rail line, the landcover is arable and the land between the western edge of the site and the village of Sole Street is pastureland, with an area of woodland immediately north of the railway line.
- 2.1.5 The rail line is lined with vegetation including trees which provide a degree of filtering and screening of views when approaching from the south. The boundary with Gold Street comprises a reasonably robust vegetated hedgerow providing a degree of seasonal screening/filtering with these effects less robust in the winter months as the hedgerow, although relatively tall, is slightly gappy at the lower level, allowing views through in places during the winter and filtered glimpses during the summer. The eastern site area, aside from having a small, wooded copse at the far western corner on the road junction and the railway cutting vegetation along the south, has no field hedge running along Batts Road, giving the lane a more open character than the narrow, enclosed Gold Street. Gold Street has a strongly rural lane character, being narrow and bounded by pollarded hedges on the north-east side with glimpses of the orchards and on the south-west side, the hedgerow with hedgerow trees forming a tall, and occasionally partial arching canopy across the lane. In winter, when the lower part of the hedgerow has gaps or close to the field access point opposite Batts Road, There are views across the vineyard towards the wooded ridges of the Kent Downs (National Landscape).
- 2.1.6 There are a number of small settlements surround the site, including Sole Street which has a small outlying part immediately bordering the north of the site and which extends to the west along Gold Street. The main body of the settlement lies across the pastureland which sits immediately west of site area A, approximately 230m from the proposed development. The village of Cobham is located approximately 1km to the north-east of the site. A linear

hamlet, Henley Street, part of the village of Luddesdown, is located approximately 0.75km to the south-east of the site. The 2 dwellings adjacent to the northern part of the western land parcel, and the closest dwellings to the proposed development, are set in large garden to the north/ central parts of the plots and appear to have moderately robust, deciduous garden boundaries, which allow filtered views from the garden across the field to the south.

3 THE PROPOSED DEVELOPMENT

3.1.1 This is the fourth application for the proposed development

- Application 1 (20230899): refused (in the current proposed location),
- Application 2 (20231258): approved (in the current proposed location) but then quashed following a judicial review challenge based upon procedural grounds, i.e., a lack of consultation.
- Application 3 (20240375): refused; this offered an alternative location at a slightly lower elevation on site area A, just south of the existing field entrance and adjacent to the public footpath NS190, crossing the centre of the field. This was not considered more acceptable to neighbours who had objected. It was refused in May 2024 by the local authority as harmful to the landscape.
- Application 4 (current), This application returns the proposal to the original location, previously refused and approved by Gravesham Borough Council.

3.1.2 Of particular relevance to the proposed winery development, it is noted that in the Kent Downs AONB Landscape Design Handbook (Section 2.2 AONB-wide landscape Design Principles), regarding Urban Edge Housing and Commercial Development, it states that:

- *"The presumption should be against AONB edge developments where they impact upon views into and out of the AONB landscape.*
- *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."*

3.1.3 Other relevant points include:

- *"integrate new development in keeping with local character, using open space and planting to provide a visual link to the countryside and an attractive backdrop/foil to development.*
- *Ensure site entrances and approaches are designed to fit within the landscape and use discrete signage*
- *Consider the need for lighting and where essential seek to minimise its impact in the landscape through choice of light source and control of light spillage.*
- *Consider the impact of development on the Public Rights of Way network."*

3.1.4 Of specific relevance to the proposed development, continuing under Section 2.2 regarding Design Principles for Rural Settlement Development, it states that:

- *“Ensure new development respects and complements rural settlement form, pattern, character and its landscape setting, reinforcing local distinctiveness.*
- *Conserve sensitive parts of settlement settings. Maintain a direct relationship between the old settlement core and the surrounding landscape, allowing views in and out.”*

3.1.5 In respect of agricultural buildings and farm accesses it states:

“Whilst planning legislation now controls the development of many farm buildings and accesses, the increase in size of farm units and machinery means modern farm buildings tend to be large and can have considerable impact on the surrounding landscape.”

Regarding their Design Principle it further states:

- *“Avoid siting new farm buildings on sensitive ridgelines, on very prominent slopes or where they could adversely affect the setting of historic farmsteads.*
- *Make maximum use of site contours without major earthworks. Avoid the use of bunding unless essential to assist with screening.*
- *Ensure outdoor storage and parking areas are not prominent.*
- *Seek to retain original farm entrances and site new ones to minimise tree and hedgerow loss, replacing any planting unavoidably lost.”*

3.1.6 In Section 3.0 Landscape Character Area Design Guidance, in relation to the Kingsdown, Luddesdown and Cobham Local Character Area, the two Overall Landscape Character Objectives are stated as being to:

- *“To retain the agricultural character of the landscape, maintaining in particular the extensive deciduous woodlands and ameliorating urban-edge pressures.*
- *Curb urbanisation and loss of distinctiveness.”*

3.1.7 In respect of Luddesdown, the nearest settlement in the National Landscape, it states in the Design Guidelines to:

- *“Conserve and extend hedgerows along ancient lanes (and reinforce hedge structure)”, similar to the more distant Cobham,*
- *“Restore hedgerows along local highways and to small scale fruit growing areas around villages.”*

3.1.8 The proposal is for an asymmetric pitched roof winery building of 645m² which is 15.710m wide x 40.481m in length and orientated on an east-west axis in the northern corner of the western land parcel. It is 8.60m at the highest point to the ridgeline and the roof eaves are lower on the northern elevation at 3.95m and 5.115m high on the southern elevation.

3.1.9 The roof is black metal, with 6 black framed roof lights on the south pitch and 6 on the north pitch, which provide almost all of the natural daylighting inside the building. The

walls will be clad in black vertical timbers. Note: in the Kent Downs AONB Farmstead Guidance, the Materials and Detail for the Area 6 Medway National Landscape landscape character area states, "Predominant walling materials are flint, brick and tile. Predominant roofing materials are plain tile with some Welsh slate."

- 3.1.10 The west elevation has 2 roller shutter doors accessing the press and crusher and the tractor vineyard equipment. There is 1 roller shutter door on the east elevation, accessing the barrel store. There are 2 roller shutter doors to eaves height on the south elevation, also accessing the barrel store and the central bottling, disgorging and labelling area and a single glazed access door to the WC's. On the northern elevation there is 1 ground floor window and a single glazed access door to a lobby and staircase down to the basement barrel aging cellar. An internal staircase to the east of the building leads to the 1st floor mezzanine, containing the labs and office facilities.
- 3.1.11 There are areas of hardstanding (total 205m²) on the west, east and southern elevations. However, these do not appear to be adequate in size to accommodate manoeuvring farm machinery, especially on the west elevation and disconnected hardstanding areas providing intermittent machine access to the west elevation.
- 3.1.12 The plans do not appear to indicate the location for the means of access to the winery. It is therefore assumed for the purpose of this review that the existing field access will be the intended access point, which is located approximately 150m to the east, south-east at the junction of Gold Street and Batt Street. It is also assumed that the route would follow the edge of the field and would be required to cross the public footpath NS 190. However, a rebuttal statement submitted by GTA Civil and Transport in September 2024, provides details of a proposed new access point to the north of the existing access, which are outside the scope of the planning application before the LPA but for the purpose of this assessment will be considered.
- 3.1.13 The proposed mitigation includes:
- Woodland belt planting along the northern boundary adjacent to the 2 dwellings abutting the north boundary.
 - Additional tree planting along the western field boundary where a new hedge is proposed.
 - Two areas of isolated woodland belt planting a little way from the building to the south-east and south-west corners, but not connected to the field boundaries.

4 REVIEW OF VOLUME 1 LANDSCAPE AND VISUAL EVIDENCE APPRAISAL

LVEIA Section 2: Policy and Guidance Framework.

- 4.1.1 Reference is made in section 2.4.2 to the Gravesham Landscape Sensitivity and Capacity Study, 2016, which assesses landscape parcel SS2/CO4 in which the site is located, as having, *“Medium - low for Small development scenario; and Low for Medium and Large development scenarios.”*
- 4.1.2 For clarity, under the descriptions of development typology, the proposed development is considered to fall between the description of Medium-large development, i.e., *“Small scale commercial/industrial use – maximum 2 storeys with associated access roads, parking and open space – e.g. local business park units; Or Larger single or two-storey community buildings/complexes, such as secondary schools or leisure centres and Large commercial/industrial units or hotels – e.g. warehouses or office blocks, with large expanses of cladding or glass, access roads, large car parks and associated landscaping.”*

LVEIA Section 3 Landscape Elements, Qualities, Functions and Character.

- 4.1.3 3.3 The Landscape Sensitivity of the Site (Topography and Soils) is assessed as being of an overall National Value, i.e., it is typical of the designated Kent Downs National Landscape.
- 4.1.4 The susceptibility to the proposed development is assessed as high, *“the site has no / limited ability to accommodate proposed type of change or type of development without transformational adverse consequences to the baseline situation or being incompatible with landscape planning policies and strategies.”* This would result in a high sensitivity on the topography and soils of the site.
- 4.1.5 It is unclear what the transformational adverse consequences on the topography and soils would be exactly, accepting that the southerly sloping aspect is a key characteristic of the landscape of the LCA 1A Kent Downs, and the proposed barn would be located within that extensive landscape element, there will be an element of intrusion within the site, however that would not significantly change the overall character across the wider site to the south. However, there would be high susceptibility arising from the form of the building which includes a basement. This would result in long-term changes to the topography and soils through large excavation of the site and displacement of the natural soil layers, which would be a permanent change to the topography (underlying geology) and soils.
- 4.1.6 **The resulting Sensitivity is considered to be High which accords with the evaluated level of sensitivity on the topography and soils.**
- 4.1.7 3.4 The Landscape Sensitivity of the Site (LCA 1A: West Kent Downs: Local Character Area – Luddesdown) and Green Belt is assessed as being of an overall National Value.
- 4.1.8 The assessment of the Susceptibility of the site as being High, based on the landscape characteristics of the Kent Downs National Landscape, specifically the Local Character Area

Luddesdown, within the LCA 1A - West Kent Downs. This is judged to be appropriate due to the range and quantity of the key landscape characteristics which the site displays.

4.1.9 In terms of the susceptibility of this part of the Green Belt (Parcel 16) to the proposed development, the Gravesham Green Belt Report Final 2020, indicates that the site lies adjacent to, but outside land assessed as having a Moderate-High Harm Rating, i.e., *"Release of land from the Green Belt that makes a relatively significant contribution to one of the Green Belt purposes and a less significant contribution to others, and would cause a minor weakening of the integrity of land that remains designated as Green Belt."* This area of land lies adjacent to the eastern boundary of Sole Street and therefore development would be more closely associated with the settlement. The site, however, is slightly removed from the main mass of the settlement and is located in an area indicated as having a High Harm Rating, i.e., *"Release of land that makes a significant contribution to at least one of the Green Belt purposes, and would constitute at least a minor weakening of the integrity of land that remains designated as Green Belt."* In section 2.5 where Parcel 16 is assessed against the national purposes of the Green Belt as detailed in the Gravesham Green Belt Study, 2018, it is concluded that the parcel of land in which the site is located fulfils two of the purposes:

- *"Purpose 2a: to prevent other settlements in the Green Belt from merging - Significant contribution: The parcel plays a significant role in preventing the merging of settlements inset from the Green Belt. Land between Sole Street and Cobham is largely agricultural though there is some development between the two along The Street to the west of Cobham and around the junction of The Street and Sole Street;"*
- *"Purpose 3: to safeguard the countryside from encroachment - Significant contribution: The area primarily consists of farmed land and orchards. There is some development close to the boundaries of the settlements of Cobham and Sole Street but this is sporadic and predates the Green Belt designation. The pylons and electricity lines are other urbanising features within the parcel. The eastern part of the parcel has a more open aspect than the areas further west due to the nature of the farming and the presence/absence of roadside hedgerows. There has not been encroachment into the parcel from new development. As such, it significantly contributes towards this purpose."*

4.1.10 Therefore, the Susceptibility rating of High is considered to be an appropriate evaluation, along with the conclusion that the Sensitivity would be high for the landscape character within the National Landscape and the Green Belt.

4.1.11 3.5 The Landscape Sensitivity of the Site (Vegetation and Nature Conservation) is assessed as being of an overall Community Value, although there are degrees of increasing value across the site, with the vines as an agricultural crop considered to be less valuable landscape elements than the surrounding hedgerows and trees. These features are more enduring landscape elements which have a long history and form distinctive markers in the wider landscape and cumulatively contribute to the sense of landscape character. The vines, although of a lower value, as agricultural crops can be less enduring, still contribute

to the character of the landscape, as they form a vegetative cover across the rural landscape, contained by the higher value hedges and areas of woodland and trees. However, as referred to in the Kent Downs National Landscape, Landscape Character Assessment Update 2020-rev. 2023, the importance of viticulture as increasingly forming the vegetative landcover; along with other crops and pastoral land cover, jointly they extensively contribute to the overall character of the rural landscape, **therefore it is considered that the value of the vine crop within the landscape is not the lowest value and the Value reassessed as being of Local Authority level.**

- 4.1.12 The assessment of the Susceptibility of the site as being Low, is based on the displacement of immature vine plants and the retention and additional planting of the mitigation planting in the hedgerows and belts of trees and shrubs. However, although assessed as being of community value i.e., "a landscape with no formal designation or identified value". While the change of crop would have a subtle effect on the overall landscape character, the replacement of part of the crop with a building would be permanent and noticeable. Also, the site and its vegetative cover do lie within the Kent Downs National Landscape, a designation which values all of the fabric of the landscape within its boundary, not selective elements within it and where the loss of part of the constituent characteristics can be considered to have a greater effect on the landscape. There would also be a loss of vegetative landcover at the highest point of the field. This is the most elevated and hence prominent part of the site where displacement of field vegetation (which forms an important part of the overall rural landscape), would be most apparent.
- 4.1.13 The proposed tree planting along the south of the proposed winery, although eventually contributing to the beneficial tree cover, which is a key element of the landscape character, is only required to screen the proposed development, where the trees within the gardens along the north boundary currently perform that function in the landscape, but which would be largely obscured by the winery. There are landscape and ecological benefits arising from the proposed planting, but the replanting of the lost western hedgerow could be undertaken regardless of the proposed development. Of note are the comments arising in the public consultation, See Section 9, concerning views east from Sole Street, where there are framed distant views across the foreground pasture-land (visually bringing the rural countryside into the heart of the village) with the garden boundary trees of Mulberry House forming the left hand frame to the wooded ridges and hills of the Kent Downs landscape beyond. The western site hedgerow is currently devoid of a hedge and has not had a planted hedge for many years -this allows the views into the National Landscape – unique for villages in the locality and the required hedgerow mitigation would enclose and remove the connection with the wider landscape. **Therefore, it is considered that the susceptibility to vegetation and landcover has been slightly underestimated and would be Low-Medium, based on the Methodology: in the LVEA Appendix 1, section 2.3.2.4 "Determining the landscape receptor's susceptibility to type of change". Therefore, combining the value and susceptibility, it is considered that the Sensitivity of the vegetation and land cover would be Medium rather than Medium-Low.**

- 4.1.14 3.6 The Landscape Sensitivity of the Site (Perceptual Qualities) is assessed as being of an overall Local Authority Value, which given the landscape description provided in section 3.6 of the LVEIA appears to be an accurate judgement, despite of the location within the Kent Downs National Landscape. **However, when factoring in the public consultation responses, it is clear that this is a highly valued landscape for a number of characteristics which people cherish (see Section 9). Therefore, it is considered that the value would be higher, i.e., National Value.**
- 4.1.15 The assessment of the Susceptibility of the site as being Medium, based on the associated vineyard and corresponding agricultural activity, is considered to be an underestimate of the level of susceptibility. Although the site has some capacity to accommodate an agricultural building, the character, scale and associated infrastructure and the operational characteristics (lighting, type of vehicular movements, etc.), of the proposed building need to be considered in the context of the associated value of the land. The scale of the building, accentuated by the hilltop location would make this a particularly prominent structure which would have little connectivity to the adjacent settlement, further accentuated by its location away from the access point. Reference should be made to the Kent Downs AONB Setting Position Statement Jan 2018 see Section 13.1.
- 4.1.16 There are a number of unknown aspects about how the building will operate, vehicle movements, etc., some of which would be typical agricultural processes within a rural setting, but others may be more urban in character, and changing the perception of the site and potentially undermining some of the valued characteristics, e.g., the *“relatively high tranquillity”*. Irrespective of the lack of detail concerning the whole development, it is considered that the susceptibility level would be high, given the location of the building at a prominent position affecting the setting of the National Landscape. **Therefore a Medium Susceptibility is considered an underestimate which is considered to be High susceptibility resulting in a High Sensitivity.**
- 4.1.17 3.7 The Landscape Sensitivity of the Site (Landscape and Settlement) is assessed as being of an overall Community Value. This would appear to be a reasonable judgement, based on the limited or altered historical value within the site. Indeed, according to the Historic Map extracts included in Figure 15 in the LVEA, there seems to have been considerable loss of field boundaries in addition to the noted loss of orchards within and to the west of the site. With a field boundary running just to the east of the proposed winery to the rail line and a further hedge line running south from the north boundary with the adjacent houses, running south through the location of the proposed winery before turning west towards the remnant orchard/woodland and across to Greenways on the south-eastern edge of Sole Street. The current pastureland west of the site formerly formed part of a field in which the western half of the proposed winery sits, with the current western boundary line being a relatively recent boundary line.
- 4.1.18 The assessment of Susceptibility of the site Medium-Low, reflecting the scattered farms within the surrounding landscape, although, as with the assessment of landscape sensitivity of the site relating to its perceptual qualities, it is considered that the proposed scale of the winery building is not typical of the traditional agricultural barns locally and

therefore in the proposed form the Susceptibility has the potential for medium Susceptibility. However, the resulting Medium Sensitivity to the proposed development is considered to be an accurate assessment, resulting in a medium Sensitivity.

- 4.1.19 3.8 The Landscape Sensitivity of the Site (Access and Recreation) is assessed as being of an overall National Value, which is an accurate assessment, based on the public footpath crossing the site and providing good links with the wider public rights of way network, especially the Wealdway Long Distance Trail located 500m to the south of the site. The public consultation clearly indicates the value the footpaths to the community and within the Gravesham Local Plan Core Strategy they form a valuable part of the Green Infrastructure policy CS12, for accessibility to the countryside from the urban centres.
- 4.1.20 The assessment of Susceptibility of the site is assessed as Medium-Low. This judgement is considered to underestimate the susceptibility of the footpath crossing the site. Currently the footpath enters the north-west boundary of the field a little way to the west of the main field access. Assuming that this field entrance will be used as the access point for the winery, there will be a vehicular access crossing the footpath, introducing potential clutter associated with signage, fencing and increased disturbance and periodic loss of tranquillity in a rural, tranquil setting, where currently the approximate 3km length of footpath between Cobham to the north-east and Meopham to the south-west traverses open countryside with no development or buildings adjacent to the path along any part of its length. It is considered that the potential changes would amount to a High Susceptibility.
- 4.1.21 It is therefore considered that there would be a High sensitivity (not Medium as assessed) to the proposed development on access and recreation.

Table 1: Summary of Landscape Receptor Sensitivity

Landscape Receptor	Value (Terra Firma LVEA)	Susceptibility	Sensitivity
	<i>Value</i> (Laurence Associates Landscape Review)	<i>Susceptibility</i>	<i>Sensitivity</i>
Topography & Soils	National	High	High
	<i>National</i>	<i>High</i>	<i>High</i>
Kent Downs National [Landscape] & Green Belt	National	High	High
	<i>National</i>	<i>High</i>	<i>High</i>
Vegetation & Nature Conservation	Community	Low	Medium-Low
	<i>Local Authority</i>	<i>Medium-Low</i>	<i>Medium</i>
Perceptual Qualities	Local Authority	Medium	Medium-High
	National	<i>High</i>	<i>High</i>

Landscape Receptor	Value (Terra Firma LVEA)	Susceptibility	Sensitivity
	Value (Laurence Associates Landscape Review)	Susceptibility	Sensitivity
Pattern of Landscape & Settlement	Community	Medium-Low	Medium
	Community	Medium	Medium
Access & Recreation	National	Medium-Low	Medium
	National	High	High

5 LVEIA SECTION 4: VIEWS

- 5.1.1 Viewpoint 1: National Value, Medium-High Susceptibility (although this would increase with the full development proposal as the character at this part of the lane would change for potential site access creation, so that the changes within the view would be immediately noticeable and which would all contribute to a considerable change to the rural village approach currently experienced). Medium-High Sensitivity, (although this would increase with the full development proposal). It is considered that this is an accurate assessment of the proposed building only.
- 5.1.2 Viewpoints 2-6: National Value, Medium-High Susceptibility and Medium-High Sensitivity. It is considered that this is an accurate assessment.
- 5.1.3 Viewpoint 7: National Value, Medium-High Susceptibility (although this would increase with the full development proposal as the character at this part of the lane would change for potential site access creation if the existing access is not utilised and a new access created on the inside bend of the road, so that the changes within the view would be immediately noticeable and which would all contribute to a considerable change to the rural village approach currently experienced). Medium-High Sensitivity, (although this would increase with the full development proposal). It is considered that this is an accurate assessment.
- 5.1.4 Viewpoint 8: National Value, High Susceptibility and High Sensitivity. It is considered that this is an accurate assessment.
- 5.1.5 Viewpoints 9-10: National Value, Medium-High Susceptibility and Medium-High Sensitivity. It is considered that this is an accurate assessment.
- 5.1.6 Viewpoints 11-13: National Value, Medium-High Susceptibility and Medium-High Sensitivity. These viewpoints are located on the edge of the designated landscape, although it may lack some of the quality characteristics associated with the wider National Landscape to the east because of the village setting, the public consultation is clear about the value of the views from the village and the role of the foreground pasture bringing the National Landscape into the heart of the village and affording distant views of the wooded Kent Downs ridge. Therefore, the susceptibility to the proposed changes within the view are considered to be high with a High Sensitivity.
- 5.1.7 Viewpoints 14-22: National Value, High Susceptibility, High Sensitivity. It is considered that this is an accurate assessment.

5.2 LVEIA SECTION 4.15 PRIVATE VIEWS FROM SURROUNDING PROPERTIES

- 5.2.1 This section is based on the views of neighbouring properties available from the site, with an approximation of what part of the proposed development might therefore be visible in reverse, this covers:

- Residential properties adjacent to the site on Gold Street, i.e., directly north of the proposed winery.
- Residential properties at the western end of Gold Street and on Sole Street, i.e., with views looking across the intervening pastureland.
- Properties on Cobhambury Road, Cobham, i.e., to the north-east on the southern edge of Cobham.

5.2.2 All of the visual receptors are judged to have a high level of interest with view of a national value as they are located within the National Landscape and of high Susceptibility and Sensitivity. This is also supported by the public consultation feedback on the value of the landscape and views from within the village looking east across the pasture and over the ridge of the site to the wider landscape beyond. The extension of the countryside into the heart of the village is highly valued for the views of the Kent Downs.

5.2.3 It is considered that this is an accurate assessment, in terms of the susceptibility and sensitivity, however, the value of the view will vary depending on individual resident's outlook, irrespective of being located within the National Landscape and Green Belt or just outside.

6 LVEIA APPENDIX 1: LVE METHODOLOGY

6.1 LVEIA 2.3 SENSITIVITY OF LANDSCAPE RECEPTOR

2.3.2.1 Context

6.1.1 It is stated that,

"When assessing landscape value of a site as part of a planning application or appeal it is important to consider not only the site itself and its features, elements, characteristics, qualities, but also their relationship with, and the role they play within, the site's context. The basis for judgement should be linked back to evidence from the baseline study."

2.3.2.2 Designated and non-designated landscapes

6.1.2 It is stated that,

"Designations can be used to assist the interpretation of the value to be attributed to different receptors, but it is acknowledged in GLVIA3 (5.4) that in-depth study may find the landscape value of a specific area is different to that suggested by a wider formal designation."

6.1.3 With some exceptions, i.e., the value of the vegetation and perception within the site which it is considered would be higher than judged, the value judgements appear to be an accurate reflection of the landscape features, elements and characteristics.

6.1.4 It goes on to state that,

"Community consultation, where practical, may also add depth in determining what people value about their local landscapes."

6.1.5 Independent Landscape and Public Right of Way Surveys have been undertaken by the community via questionnaires. These would not have been available at the time that the LVEIA was prepared, but this review considers what impacts the results have on the assessment of value on the landscape from a local perspective and irrespective of whether a landscape is designated or otherwise.

6.1.6 There are a number of areas where it is considered the susceptibility of the landscape receptor to the proposed development and consequently the overall sensitivity of the landscape receptor has been slightly underestimated, the reasons are outlined in Section 4 but include Vegetation, Perception, Settlement and landscape Pattern and Access and Recreation.

6.1.7 One reason for this arises from aspects of the proposed winery development which are as yet unknown, as they don't form part of the current application (and is therefore not a shortcoming on the LVEIA), but will ultimately have wider impacts on the landscape which are important to understand to aid a landscape-led approach to development.

- 6.1.8 The other reason is the factoring in of the value judgements about the landscape in which the residents live and experience daily, which add to the narrative of what constitutes value in the landscape on a personal level.
- 6.1.9 The principal area which could have a fairly significant impact in addition to the proposed building is the point of access off Gold Street and the drive to the building. Assuming the point of access remains as the current field access point, there will be changes to the character of the rural lane with the potential entrance gateway, provision of adequate visibility splays, signage, a surfaced access track to the building, fencing or hedging and this would potentially cross the NS190 public footpath. The potential impacts on the landscape would therefore not only be of a physical change and extend impacts further from the settlement to the landscape but change the tranquil quality of the rural approach to Sole Street. Conflict with the footpath would conflict with the aims of the Kent Downs National Landscape Management Plan

6.2 LVEIA 3.1 SENSITIVITY OF THE VISUAL RECEPTOR

GLVIA 3, 3.1.3 Determining Value of the view

- 6.2.1 It is stated that,
- "This is a judgement of value attached to the particular view, through planning designations, recognition of historic, tourism or cultural value, or through community or perceived value. Once designations (if relevant) and factors, such as listed above, are all considered, then an overall value can be attributed to the visual receptor..."*
- 6.2.2 It is considered that the assessment of Value of a particular view has been restricted to the location of a viewpoint either within or outside a designated area, i.e., accorded National in the National Landscape. This can be read as being of high value compared to Community Value, which can be read as being of Lower Value. This unduly weights the best views as being within a designated landscape, whereas not all views within that landscape are necessarily of high value, depending on the setting, detracting elements within the view, etc., which affect the overall value of that view. Equally, views which may possess no detracting elements and afford good quality landscape characteristics and setting would not score as highly; this would include transitional views across the boundary setting of the National Landscape where it is established that there can be high value views into the National Landscape from a non-designated landscape and equally in reverse, there may be high value views from the National Landscape towards and across non-designated landscapes. This is evident in the determination of Sensitivity within the colour graded diagram, where to achieve the highest sensitivity, as well as being high susceptibility the value of the viewpoint location would need to fall in the National/ international category, whereas a high value view within a non-designated landscape where the susceptibility is high could not achieve the same value level.
- 6.2.3 Therefore, it is considered that the assessment of value when considering views and the visual receptors is flawed and too restrictive and does not work in the way outlined in

GLVIA 3 paragraph 3.1.3. included above. This is demonstrated clearly through the public consultation responses regarding values of views and landscape.

- 6.2.4 Interestingly, the same restriction has not been applied in the assessment of Value for landscape receptors, where irrespective of the location within the National Landscape, not all aspects of landscape character are evaluated as National (High).
- 6.2.5 It is considered that some of the viewpoint judgements have been slightly over estimated. These are detailed in section 5.

7 REVIEW OF VOLUME 2 LANDSCAPE AND VISUAL IMPACT APPRAISAL

7.1 LVEA 3. APPRAISAL OF LANDSCAPE EFFECTS

- 7.1.1 3.3 topography and Soils: It is stated that the effects on topography and soils would be limited and only immediate to the building. Although this is correct, it is considered that the impacts would be fairly substantial due to the excavation of soils and bedrock to accommodate the basement cellar storage area, this would amount to approximately 716m³ of excavated material, not including any potential excavated material to form the level base for the main building area and surrounding hardstanding areas. This would be a permanent change to the natural topography of the site within the National Landscape.
- 7.1.2 **It is considered that a Low Adverse Magnitude would be an underestimate of the effects arising on a national value landscape element and that this would be a Medium Adverse Magnitude Effect, i.e., the scale of excavation required in association with an agricultural building would be considerably more than expected for normal agricultural uses. The extent is limited in area but considerable in depth. This would be a permanent change which could not be reversed to the true character of the underlying geology, although the excavations could be backfilled with other fill and regraded to the natural contours. This combined with a High Sensitivity landscape receptor would give a Major/Moderate effect on topography and soils.**
- 7.1.3 3.4 Kent Downs National Landscape (LCA1 A: West Kent Downs Local Character Area – Luddesdown) and Green Belt: It is stated that the effects on the LCA, National Landscape and Green Belt would be a Low Adverse Magnitude of Effect. This is a large-scale building, even compared to other agricultural building locally and is not associated with other existing farm buildings. Additionally, the proposed winery occupies the most elevated part of the site; a location which is open principally to the south and east, i.e., a direct association with both the landscape of the National Landscape and Green Belt.
- 7.1.4 **It is considered that this would give rise to a Medium Magnitude of Effect, i.e., The scale of the building is greater than other agricultural buildings within the area. The geographical area of the building is limited, but this doesn't account for the access and driveway to the building which, as there is no detail of this, could extend the impacts further into the rural landscape if utilising the existing field access, also the extent over which the effects are felt are greater due to the elevated location in the field. It is assumed that the duration would be long term as viticulture is a longer-term commitment, i.e., exceeding 10 years. This combined with a High Sensitivity landscape receptor would give a Major/Moderate effect on the National Landscape, Green Belt and LCA1 A: West Kent Downs Local Character Area – Luddesdown.**
- 7.1.5 3.5 Vegetation and Nature Conservation: The value has been assessed as community level. However, it is considered that this was a slight underassessment and that the value of this characteristic would be local authority level, resulting in Medium rather than Medium-Low Sensitivity.

- 7.1.6 **It is stated that the effects on the vegetation and nature conservation would be of Low Beneficial Magnitude.** On balance, taking into consideration the proposed mitigation planting and the loss of a small area of juvenile vines and the replanting of the poor condition western boundary hedge appears to be an accurate assessment, although the value of the mitigation planting is reduced as it would have been more beneficial if the planting to the south extended across the site to provide connectivity with the new planted western boundary and the existing hedgerow along Gold Street. It should be noted that there is a potential conflict with the planting of the western boundary hedge and woodland belt planting (positive in biodiversity terms) but potentially negative in terms of restricting the views and visual connection from Sole Street across the pasture to the open Downs landscape which is locally highly valued. Therefore, a conflict with the required mitigation of the building which would itself undermine the view from the village. Planting a low hedge without the trees might provide a compromise but there would still remain the conflict of mitigation. **The resulting effect would remain as Nil Magnitude and Neutral Overall.**
- 7.1.7 **3.6 Perceptual Qualities:** In Section 4, a number of considerations about the proposed development are set out, which are relatively unknown at this stage, but these could have a substantial bearing on the magnitude of effects which arise and it is considered would increase the assessed level of susceptibility and sensitivity of the site, to High.
- 7.1.8 **It is therefore considered that the assessed Low Adverse Magnitude of Effects is an underestimate in the light of the 'entire' development, including the access and drive.** Even if the magnitude of effects reduces over time with the maturation of the mitigation planting, the immediate and short-medium term effects will be higher. **It is considered that the potential Magnitude of Effects would be Medium Adverse, resulting in an overall Major-Moderate Adverse effect on the perceptual qualities.**
- 7.1.9 **3.7 Pattern of Landscape and Settlement:** In Section 4, it is considered that although in principle the isolated building would be consistent with scattered and isolated farmsteads, the scale of the building is not compatible with those of local agricultural buildings and occupying a prominent elevated location. The proposed mitigation planting will change the pattern of the landscape character to a limited extent in the wider landscape context but to a greater extent in the local context, where it will impact considerably on the experience of views and landscape connectivity between the heart of Sole Street and the National Landscape of the Kent Downs. However the overall value is assessed as of community value which appears accurate, despite finding that the susceptibility to the proposed development was considered to be slightly higher. The assessed level of magnitude of Effect as Low Adverse to Nil is considered to be slightly underestimating the landscape effects, **It is considered that the effects would not be less than Low Adverse which combined with a medium sensitivity receptor would give rise to a Moderate-Minor adverse effect on the pattern of the landscape.**
- 7.1.10 **3.8 Access and Recreation:** The sensitivity of the site was assessed as medium. In section 4, it is considered that this is an underestimate, the main reasons being the unknown aspects of the proposed development including the access point and drive which has the

potential to conflict with the existing footpath if it utilises the existing field access and the results of the public consultation on the value of the footpaths. The landscape character for many of the Public Rights of Way located in open farmland to the south, including the Wealdway long distance trail, will be changed due to the scale and prominence of the proposed building on a prominent elevated position along a route running between Cobham to Meopham, which is characterised by rural farmland, passing no buildings. High levels of rural tranquillity have the potential to be undermined at closer proximity. The rural character of the footpath, which is well used due to its proximity to Sole Street would be undermined. It was considered that the sensitivity level would therefore be High.

7.1.11 The magnitude of effects on access is assessed as nil magnitude seasonally increasing to Low Adverse. This is considered to be an underestimate of the effects and not reflective of the short-medium term situation before mitigation planting establishes to become an effective screen. It is considered that the Magnitude of landscape Effects would be Medium Adverse, due to the scale of the development, which would change the landscape experience. The potential change to the experience where the footpath enters the site if the access is required to cross the route. The effects would be of a long-term duration. This combined with a High Sensitivity would result in a Major Moderate landscape effect.

Table 2: Summary of Magnitude of Landscape Effects and overall Significance

Landscape Receptor	Sensitivity (Terra Firma LVEA)	Magnitude of Effects – Year 1	Landscape Effects
	<i>Sensitivity (Laurence Associates Landscape Review)</i>	<i>Magnitude of Effect – Year 1</i>	<i>Landscape Effects</i>
Topography & Soils	High	Low Adverse	Moderate Adverse
	<i>High</i>	<i>Medium Adverse</i>	<i>Major-Moderate Adverse</i>
Kent Downs National [Landscape] & Green Belt	High	Low Adverse	Moderate Adverse
	<i>High</i>	Moderate Adverse	<i>Major-Moderate Adverse</i>
Vegetation & Nature Conservation	Medium-Low	Low Beneficial	Minor Beneficial
	<i>Medium</i>	<i>Nil</i>	<i>Neutral</i>
Perceptual Qualities	Medium-High	Low Adverse	Moderate to Moderate- Minor Adverse
	<i>Medium-High</i>	<i>Medium Adverse</i>	<i>Major-Moderate Adverse</i>
Pattern of Landscape & Settlement	Medium	Low Adverse - Nil	Moderate-Minor Adverse to Neutral
	<i>Medium</i>	<i>Low Adverse</i>	<i>Moderate-Minor Adverse</i>

Landscape Receptor	Sensitivity (Terra Firma LVEA)	Magnitude of Effects – Year 1	Landscape Effects
	<i>Sensitivity (Laurence Associates Landscape Review)</i>	<i>Magnitude of Effect – Year 1</i>	<i>Landscape Effects</i>
Access & Recreation	Medium	Nil (seasonally Low adverse)	Neutral (seasonally Moderate-Minor Adverse
	<i>High</i>	<i>Medium Adverse</i>	<i>Major-Moderate Adverse</i>

8 LVEIA SECTION 5 APPRAISAL OF VISUAL EFFECTS

- 8.1.1 The value, susceptibility and sensitivity of the viewpoint and visual receptor have been reviewed in section 5, this will not be repeated here. This section will review the assessed magnitude of effect and the overall significance of the visual effect arising from the proposed development. Although the LVEIA assesses solely the application for the Winery building, this review raises the potential visual effect which may arise from the full development, i.e., the necessary aspects of the development, currently unknown, but which will be required for the development to function, e.g. site access and driveway to the building.
- 8.1.2 Another key point concerning the magnitude of visual effects is the sensitivity of the visual receptor, in turn influenced by the value of the view and experience of the viewpoints. The public consultation survey concerning the public rights of way and the landscape both indicate that both these aspects are afforded a high value locally and this needs to be added into the evaluation process to provide the important human element to why a view is valued.
- 8.1.3 **Viewpoint 1: Assessed as Low Adverse Magnitude Visual effect resulting in a Moderate to Moderate Minor Adverse Effect.** It is considered that accounting for the potential visual changes arising from the required site access road and potential reduction in tranquillity, the impacts would be more extensive than just being confined to the building location, there would be **Medium Adverse Magnitude Visual effect resulting in a Major-Moderate to Moderate Adverse effects.**
- 8.1.4 **Viewpoints 5 & 6: Assessed as Low Adverse Magnitude Visual effect resulting in a Moderate to Moderate-Minor Adverse Effect.** It is considered that this is an accurate assessment.
- 8.1.5 **Viewpoints 7, 9 & 10: Assessed as Low Adverse to Nil Magnitude Visual effect resulting in a Moderate Adverse to Neutral Effect, (with a Moderate to Moderate-Minor Adverse Magnitude effect at Viewpoint 7 during the winter).** It is considered that this is an accurate assessment for viewpoints 9 and 10 but a slight under assessment for viewpoint 7, which clearly has glimpses through the hedge in summer months, therefore the assessment of Nil Magnitude for viewpoint 7 would not apply. Overall, it is considered that there would be a **Low Adverse Magnitude effect resulting in a Moderate to Moderate-Minor Adverse Effect.**
- 8.1.6 **Viewpoint 8: Assessed as Low Adverse to Nil Magnitude Visual effect resulting in a Moderate to Moderate Adverse to Neutral Effect.** It is considered that this is a slight under assessment, as there is potential for the site access to be located in the existing field access, visible in the gap in the hedge to the left of the view. Overall, it is considered that there would be a **Moderate Adverse Effect.**
- 8.1.7 **Viewpoints 11, 12 & 13: Assessed as Low Adverse Magnitude Visual effect resulting in a Moderate to Moderate-Minor Adverse Effect.** It is considered that this is an

underestimate of visual effects when considered in the context of the high value locally attributed to the views from Sole Street of the rural landscape setting. It is considered that this is **Medium Adverse Magnitude Visual effect resulting in an overall Major-Moderate Adverse effect.**

- 8.1.8 **Viewpoints 14 & 15: Assessed as Low Adverse Magnitude Visual for viewpoint 14 and a Medium-Low Adverse visual effect for viewpoint 15.** It is stated that the overall assessment is based on a Medium-High Sensitivity visual receptor, however in Volume 1, Section 4 the sensitivity of the walkers is assessed as High. This would not have an effect on their assessment of the overall effects which are Moderate Adverse for viewpoint 14 and Major-Moderate to Moderate for viewpoint 15.
- 8.1.9 It is considered that this is an under assessment of the magnitude of the visual effects which would be experienced by walkers across open farmland and the results of the public survey indicate that the views from the footpath are highly valued. The proposed winery would be a new and highly prominent feature, located in an elevated position, partially on the skyline at close proximity. In addition, at the point of viewpoint 14 there is the added potential change to the rural view with the site access road which would potentially cross this part of the footpath, if the existing field access was utilised for this. If a new access was created within the hedgerow running to the north-west, there would be a lesser change to the view with the removal of a section of mature hedgerow. The access road would periodically change not only the visual characteristics of the view but reduce the tranquillity. It is considered that the **Magnitude of visual effects would be High-Medium Adverse for viewpoint 14 and Medium Adverse for viewpoint 15, resulting in an overall Major to Major-Moderate Adverse effect (viewpoint 14) and Major-Moderate Adverse for viewpoint 15.** This would reduce as the mitigation planting matures for viewpoint 15, although viewpoint 14 is likely to be changed permanently by the potential site access and road which will be required.
- 8.1.10 **Viewpoints 16, 17, 18 & 19: Assessed as a range of Low Adverse to Low Adverse-Nil Magnitude Visual effects.** This would result in an overall effect range of moderate Adverse to Moderate Adverse to Neutral. It is stated that the overall assessment is based on a Medium-High Sensitivity visual receptor, however in Volume 1, Section 4 the sensitivity of the walkers is assessed as High. This would not have an effect on their assessment of the overall effects which are Moderate Adverse for viewpoint 14 and Major-Moderate to Moderate for viewpoint 15.
- 8.1.11 It is considered that this is a slight under assessment of the magnitude of the visual effects which would be experienced by walkers across open farmland at increasing distance from the site and the results of the public survey indicate that the views from the footpath are highly valued. This considers the potential for the access drive to be extending the activity within the site along the north-east boundary to the east of the proposed building, therefore extending the influence of the building periodically. It is considered that the **Magnitude of visual effects would range from Medium Adverse Magnitude at viewpoint 16 and decreasing to Low Adverse Magnitude at viewpoint 19, resulting in an overall**

effect in the range of Major-Moderate Adverse to Moderate Adverse. This would reduce as the mitigation planting matures.

- 8.1.12 Viewpoint 20 & 21: Assessed as a range of Low Adverse to Low Adverse-Nil Magnitude Visual effects resulting in an overall effect of Moderate-Minor Adverse to Neutral visual effect on the medium to high sensitivity viewpoint 20, with a high sensitivity from viewpoint 21 resulting in a moderate adverse to neutral visual effect. This appears to be an accurate assessment of the visual effects.

8.2 LVEA 5.10 PRIVATE VIEWS FROM SURROUNDING PROPERTIES

- 8.2.1 The characteristics of the potential views from private properties are described as follows:

- Gold Street: *"Views to the proposed building may be possible from rear windows and the grounds of properties to the south of Gold Street. However, any views during summer months would be filtered by intervening mature trees on the site boundary and within the grounds of these properties; Glimpsed views to the proposals may be possible from south / southwest facing windows of the properties to the north of the lane, and would be similarly filtered by intervening mature vegetation / restricted by intervening houses. The proposed belt of native tree and shrub planting between the winery building and the northern site boundary would increase screening in the long term. Views would be more open during winter months."*
- Western end of Gold Street and on Sole Street: *"Although there may be oblique views to the proposed building from houses on Gold Street and adjacent locations on Sole Street, views would be partially filtered by intervening mature vegetation surrounding Hevers Cottage and Mulberry House. There may be more open views from selected properties on Sole Street and Greenlands. Where visible, the proposed building would be seen within a strong framework of mature trees / small woodlands, along with existing properties in the foreground on Sole Street, and on Gold Street. Proposed native hedgerow planting on the western boundary and a belt of native tree and shrub planting between the winery building and the northern site boundary would provide additional screening, although views would be more open during winter months."*
- Cobhambury Road, Cobham: *"Possible glimpsed views to the roof of the proposed building are likely to be restricted by topography and intervening vegetation, including mature roadside vegetation on Gold Street and surrounding Danes Place. Any views to the proposed building would be seen within a strong framework of mature trees / small woodlands, with pylons prominent in the view, both in the foreground, and on the horizon. Proposed native tree and shrub planting to the north and south of the winery building would provide additional screening, although views would be more open during winter months."*

- 8.2.2 This appears to be an accurate description of the potential extent of views generally from properties, but exact visual impacts would need to be verified through a specific Residential

Landscape and Visual Amenity Assessment, which is beyond the scope of the LVEA and this Review.

- 8.2.3 The results of the public survey into the value of the views and landscape are revealing, and the value of the openness attributed to views from Sole Street across the pastureland in the heart of the village to the open landscape of the Kent Downs is very highly valued and would be lost through the proposed development and the associated mitigation , as this sits on the transition line between the foreground rural landscape and the distant Wooded and more expansive landscape of the Kent Downs.



Winter sunrise over the site from Sole Street

9 INDEPENDENT COMMUNITY CONSULTATION

- 9.1.1 As part of the application and the submitted LVEIA, a process of public consultation, to determine the value afforded to the landscape and views; both generally and when using local footpaths or within the village of Sole Street, primarily for the local community, was not undertaken. The the Guidelines for Landscape and Visual Impact Assessment (GLVIA 3) state, in paragraph 3.42 that,

"Consultation is an important part of the Landscape and Visual Impact Assessment process, relevant to many of the stages described above. It has a role in gathering specific information about the site, and in canvassing the views of the public on the proposed development. It can be a valuable tool in seeking understanding and agreement about the key issues and can highlight local interests and values which may otherwise be overlooked. With commitment and engagement in a genuinely open and responsive process, consultation can also make a real contribution to scheme design."

- 9.1.2 In paragraph 5.32, concerning specifically the assessment of Landscape Value, it states that,

"In making the assessment of landscape value it is important where possible to draw on information and opinions from consultees. Consultation bodies will usually give an expert view as well as providing relevant existing information. Consultations with local people or groups who use the landscape in different ways may, where practicable, also suggest the range of values that people attach to the landscape."

- 9.1.3 In paragraph 2.3 it gives guidance on what landscapes are included, it states that,

"This guidance embraces this broad interpretation of what landscape means and uses it throughout. It is not only concerned with landscapes that are recognised as being special or valuable, but is also about the ordinary and the everyday – the landscapes where people live and work, and spend their leisure time."

- 9.1.4 Neighbourhood Development Plans, where these exist, can be a useful resource for establishing key community views, values and experiences at a parish community level, and expanding the evidence base for judgements of landscape value, however no such plan is available for the Parish of Cobham and Sole Street. As a response to this application, a landscape survey and a public right of way survey were undertaken within and by the community. By integrating public perceptions, the evaluation of the GLVIA 3 Box 5.1 criteria for identifying valued landscapes becomes significantly enriched. Stakeholder input ensures the inclusion of intangible qualities such as perceptual aspects, e.g., tranquillity, and cultural associations, and informal conservation efforts but even scenic quality, which may be very different from a professional judgement because of the interplay of memories, experience and associations with a particular view. Without this consultation, the assessment risks undervaluing the landscape's socio-cultural and perceptual dimensions.

9.1.5 This analysis demonstrates how survey information can enhance the robustness and transparency of landscape assessments, aligning with GLVIA 3's principles of inclusivity and comprehensive evaluation.

9.1.6 However, an important consideration is whether the consultation responses are expressed within the parameters of pre-defined categorical choices or whether these are enriched by individual responses that provide deeper, more personalised, indications of the experiential dimensions that enrich the assessment. These observations, in accordance with the GLVIA 3 methodology, (see Box 5.1) can illuminate visual as well as landscape effects, secondary or indirect effects and cumulative effects and those of value. GLVIA 3 also, provides further insight into the public's responses regarding visual effects, in paragraph 6.14,

"People generally have differing responses to changes in views and visual amenity depending on the context (location, time of day, season, degree of exposure to views) and purpose for being in a particular place (for example recreation, residence or employment, or passing through on roads or by other modes of transport)."

9.1.7 Understanding this, the descriptive elements of the surveys will be used to inform economic models to establish health and wellbeing outcomes. The free text element of the surveys; where the public are asked to explain their views/reasons in words, hold a more valuable source of information in terms of contributing to the LVIA process, establishing individual, personal and qualitative considerations of landscape value. Therefore, for the purpose of this review, only the free-text element of the surveys has been used. These answers capture the varying reasons why a landscape or view happens to be such an important element in a person's life, experiences and perceptions; which may vary from one person to another, which is lacking when just relying on quantitative and predetermined factors, e.g., designation. These responses require time, thought and reflection, which gives rise to ideas and a tangible expression of value which can be combined with professional judgements, and factual data to provide a more rounded picture of the landscape.

Landscape Survey

9.1.8 Question 6 asks,

"Please explain how you see the landscape in your mind, with examples, using your own words, in natural speech."

9.1.9 There were 144 responses and the key elements included:

- Natural beauty, reconnect with nature.
- Peaceful, tranquil, welcoming.
- Calming atmosphere.
- Rural view without large buildings.

- A place I was proud to grow up in.
- Unspoilt, scenic, gentle.
- Accessible.
- Steeped in history.
- Views across the Downs and across the byways.
- Uninterrupted undulating historic countryside
- View is unique for a village.
- Always something new to look at, light changes with seasons and weather.
- Haven for wildlife, birdsong.
- Once you pull into Gold Street, this is where the AONB starts for me.

9.1.10 Question 12 asks;

"The proposed site and area affected by it [proposed development] contains, the following features select ALL that apply)." The following were the options and respondents were requested to elaborate further.

- *None of the above*
- *Distinctive features, or distinctive combinations of features, such as dramatic or striking landform or harmonious combinations of landcover*
- *Presence of natural lines in the landscape (e.g. natural ridgelines, woodland edges, river corridors, coastal edges)*
- *Visual diversity or contrasts which contributes to the appreciation of the landscape*
- *Memorable/ distinctive views and landmarks, or landscape which contributes to distinctive views and landmarks*
- *Strong aesthetic qualities such as scale, form, colour and texture*

9.1.11 There were 58 written responses and the key observations were:

- A true example of the garden of Kent.
- This area is truly rural and valuable landscape.
- Looks like England old and sets the tone for the whole area and village.
- The orchard is a visual gateway into the AONB and includes a footpath leading to the developing woodland/downland landscape.
- The wide range of trees, crops, plants and wildlife is natural to the area.

- Wide open views next to the village.
- The walks are very quiet and peaceful.
- Long, wide open views of a rural habitat that comes into the village like a peninsula.
- When the sun rises over it, it is quite phenomenal and harmonious.
- No other local village has a National Landscape that injects such a scenic natural beauty into its heart. The scenery is rare in that no other local village has a landscape like this that sits in its heart.
- Very much a signature landscape in the area and walkers on the Wealdway will often stop and take pictures.

9.1.12 These comments express a deep value of the landscape both in the wider rural area around the village, but also the importance of the landscape which permeates to the heart of the village, extending the rural landscape to the doorstep of the community and providing the community with wide open views to the wider rolling countryside across the pastureland. The proposed development would sit on the gentle transitional ridgeline where these views in and out cross.

Public Rights of Way Survey

9.1.13 Question 9 asks,

"Please tell Gravesham Council your views on the impact of the LOCATION of this development on the public Right of Way Network and your SAFETY AND ENJOYMENT of the countryside if this [the proposed winery] becomes a permanent feature of the area."

9.1.14 There were 248 responses to this question, the majority of responses expressed concern with a small number not objecting, particularly if there were measures to protect safety of pedestrians against development traffic. The key areas of concern included:

- The impact on the local road network, which consisting of country lanes is unsuitable for increased traffic and larger vehicles accessing the proposed development, resulting in damage to hedges and landscape elements, loss of tranquillity, reduction in safety crossing or accessing footpaths for walkers, cyclists and horse riders from the country roads.
- Loss of tranquillity.
- The footpaths offer gentle exercise across gentle slopes.
- The footpath offers beautiful views.
- The footpaths are vital for health and wellbeing, providing recreation out of the nearby towns.
- Public spaces which are relatively free from road traffic/noise/pollution are vitally important and increasingly rare.
- Will spoil the open aspects of the North Downs.
- Will spoil the lovely view for walkers using the historic footpath through the National Landscape.
- Lovely quiet walk with stunning scenery, no intrusions, lovely valley views both ways.
- The proposal would blight the landscape – prominent on the skyline.
- Popular route because the only local path with a dedicated footbridge over the rail line.
- Visible eyesore, blocking views and scarring landscape.
- Introduce industrial noise to a rural environment.

9.1.15 The views expressed indicate that, at a community level, the footpaths and particularly footpath NS190 which runs closest to the proposed winery and could potentially be directly affected by the vehicle access to the building, indicate that the views are valued as high for a range of reasons, not just visual. In the LVEIA the views from this footpath (viewpoints 14-17 were all evaluated as having High (National) Value, based on being located within

the Kent Downs National Landscape and the Green Belt. However, the value of views can vary within a designated landscape as much as within a non-designated landscape. This survey information supplies the information about what is really valued about this footpath, by the local community. Therefore, although this information doesn't change the assessed value, it endorses the evaluation, lending greater weight to the value by conveying experiential meaning to the value of the footpath, so that it is then easier to assess how the proposed development would have a direct impact on those more specific and immediate values than purely basing it on the wider general baseline value of being located within the National Landscape.

10 LANDSCAPE CHARACTER ASSESSMENTS

10.1 GRAVESHAM LANDSCAPE CHARACTER ASSESSMENT 2009

10.1.1 This is a borough-wide landscape character assessment and therefore is more detailed in the area descriptions than the county-wide or national landscape character assessments.

10.1.2 The site is located within the far south-east part of the Istead Arable Farmlands LCA, which extends north and west of Sole Street, restricted in the north by the A2. The key characteristics include:

- *Gently undulating topography with open arable fields*
- *Fields divided by tracks, roads and occasional hedgerows*
- *Orchards to the east*
- *Minor native woodland clumps*
- *Few roads, which are open in character*
- *Clusters of properties and farmsteads*
- *Large pylons*

10.1.3 The Condition; contrary to the County-wide assessment of Good, describes this as Poor, stating that;

"The pattern of elements within the landscape is coherent, with regular shaped fields and a network of tracks along field boundaries. There is some fragmentation in terms of land use. Whilst the majority of the area is under intensive arable use, fruit orchards dominate the eastern corner of the area. However, other factors are consistent throughout the area, including the topography, infrequency of roads. Electricity pylons dominate the area and although there are few other detractors, the scale and frequency of the large pylons is a significant visual detractor within the landscape. Visual unity is interrupted. The ecological integrity of the area is poor because of the dominance of arable land and limited amounts of hedgerow and woodland clumps. There are few heritage features visible within the landscape and the overall condition of the landscape is assessed as poor."

10.1.4 The Sensitivity; also contrary to the county-wide assessment of High, describes this as Moderate, states that;

"Distinct landscape elements comprise isolated buildings and farmsteads that contribute towards local distinctiveness through their traditional style and use of materials. Enclosure provided by ditch lines and remaining hedgerows provides historic features. However, many features and elements of the landscape are indistinct and recent, and overall there is a weak sense of place. The open character of the landscape and consequential high visibility across the character area provide a moderate level of sensitivity overall."

10.1.5 The guidelines are to Restore and Create, i.e., Guidelines for the Istead Arable Character Area are to restore distinctive features and patterns of the landscape, whilst creating landscape elements that support the landscape character. Some selected guidelines include:

- *“Restore traditional field structure and enclosure with native hedgerows and boundary planting.*
- *Restore and create an access network linking urban areas with existing and proposed recreational opportunities including Jeskyns Farm and the wider landscape.”*

10.2 KENT DOWNS NATIONAL LANDSCAPE LANDSCAPE CHARACTER ASSESSMENT UPDATE 2020, REVISED AND PUBLISHED 2023

10.2.1 This is an assessment of the landscape character within the Kent Downs National landscape.

10.2.2 The site lies within the West Kent Downs Landscape Character Area 1A within the National Landscape, i.e., Chalk Downs and within the Local Character Area of Luddesdown with Local Area Cobham to the north, however the site visually links with the wider Luddesdown area which extends to the south and east. Part of the general description of the West Kent Downs describes the characteristics of the site and the landscape context well:

“It is a well-wooded area, which creates an enclosed and often intimate landscape. Where it opens out there are occasional long views, including striking views along valleys....there are few views out of the area, giving it quite an insular quality. The deeply rural and historic character of much of the area is particularly remarkable given its close proximity to urban centres.”

10.2.3 The Luddesdown Local Character Area is described as:

“This is a rich agricultural patchwork of rolling, valley-side pastures and undulating arable fields. The field pattern is irregular, with fields of various shapes and sizes, generally divided with native hedgerows. Large areas of native mixed woodland dominate the skyline, and form thick ‘walls’ around the fields, giving a strong definition to the fields and providing valuable ecological habitat.”, “Recent vineyard planting is generating a notable change to the agricultural patterns of the landscape.”

“The lack of settlement is one of the area’s characteristic features.”

“This is a tranquil, complex and distinctive landscape, with a peaceful remote feel, strong sense of place and few detracting features. It has a strong sense of time-depth, and the structure of the landscape has remained largely unchanged since the late nineteenth century, although there has been some field boundary loss. The thick belt of woodland along the eastern and southern scarp top plays an important role in preserving this atmosphere, by sheltering the area from the surrounding settlements and transport corridors.”

10.2.4 Landscape Management Recommendations in section 2.4 state to;

"Protect the deeply rural character of the area, resisting development which gives it a more urbanised character. This includes retaining the character of rural lanes."

"Protect historic features of the landscape- these include Listed Buildings, Conservation Areas etc. (and their settings and views), but also the historic hedgerows, farms and lanes which have formed the fabric of the landscape for centuries."

"Ensure that any new development around historic villages respects the scale, layout, massing and materials of existing buildings, and also their relationship with the landform. Landscape proposals should reflect local character, using appropriate form, structure and species."

10.3 THE LANDSCAPE ASSESSMENT OF KENT (2004)

10.3.1 This is a county-wide landscape character assessment and therefore is more general in the area descriptions. Greater detail is provided at the local level, specifically within the Kent Downs National Landscape Landscape Character Assessment update 2020, revised and published 2023, which is a more recent and reviewed assessment. The site lies within the Luddesdown local character area within the larger character area of the West Kent Downs Landscape Character Area. The key characteristics for West Kent Downs are described as:

"Woodland is very significant in this landscape, providing an important backdrop for the rolling landform, the network of small country lanes, the scattered settlements and the extensive valley pastures. In the east, around Luddesdown, the fields are contained by thick walls of woodland, and strips of remnant coppice, or shaws, occur frequently along the steeper valley sides. Hidden away among trees are several medieval buildings, such as Luddesdown Court, constructed from the local Kentish ragstone, while the villages of Vigo and West Kingsdown are set deep in the woodlands themselves."

10.3.2 The description for the local area of Luddesdown describes it as,

"This is a rich agricultural patchwork of rolling, valley-side pastures and extensive, undulating arable fields. Large areas of mixed woodland dominate the skyline, and form thick walls around fields, giving a strong definition to the fields. Extensive hedgerow removal, for arable cultivation, has increased the importance of these woodlands in giving structure to the landscape. Threatened from the west by creeping suburbanisation and from the east by urban and industrial influences, it is still a peaceful, rural area. The thick belt of woodland along the eastern and southern scarp top plays an important role in preserving this atmosphere by sheltering the area from the Medway towns and factories."

10.3.3 The Condition is considered Good:

"The unity between landform and landscape elements is slightly interrupted by loss of hedgerow and the intensity of some areas of cultivation. However, there are very few visual detractors - some unsympathetic farm complexes and pylons amongst other minor

detractors. The strong and extensive ecological base of wooded ridges is modified by the intensive agricultural use within arable areas on the lower slopes. The condition of heritage features is variable: tree cover is good, but field boundaries are few and declining. The scattered and isolated historic farmsteads are dominated by piecemeal residential development in the west of the character area. Characteristic building styles are of mixed age and have a moderate positive impact. The condition of the area is considered to be good."

10.3.4 The Sensitivity is considered High:

"The area has a strong time-depth, reinforced by the distinctive ridgeline woodland and ancient highway routes. The historic hedgerow pattern is in decline and no longer contributes to the local distinctiveness. Many of the characteristic narrow, banked roads are open within arable areas, having lost their hedged boundaries. However, where they persist, they have a distinctive mix of species and are characteristically tall. Visibility is moderate as the landform is apparent and tree cover is intermittent. Sensitivity is considered to be high."

10.3.5 Landscape Actions are to Conserve:

"It is the ancient characteristics which are the strong element of this landscape, which should be conserved and enhanced. The unity between landform and the landcover is another very positive attribute. The loss of hedgerow in the arable areas may be addressed by conserving and extending remaining hedges along the highway, but this is possibly not appropriate within arable fields. The isolation and small-scale of farmsteads and hamlets should be conserved."

11 POLICIES AND GUIDANCE

11.1 GRAVESHAM LOCAL PLAN CORE STRATEGY 2014 (GLPCS)

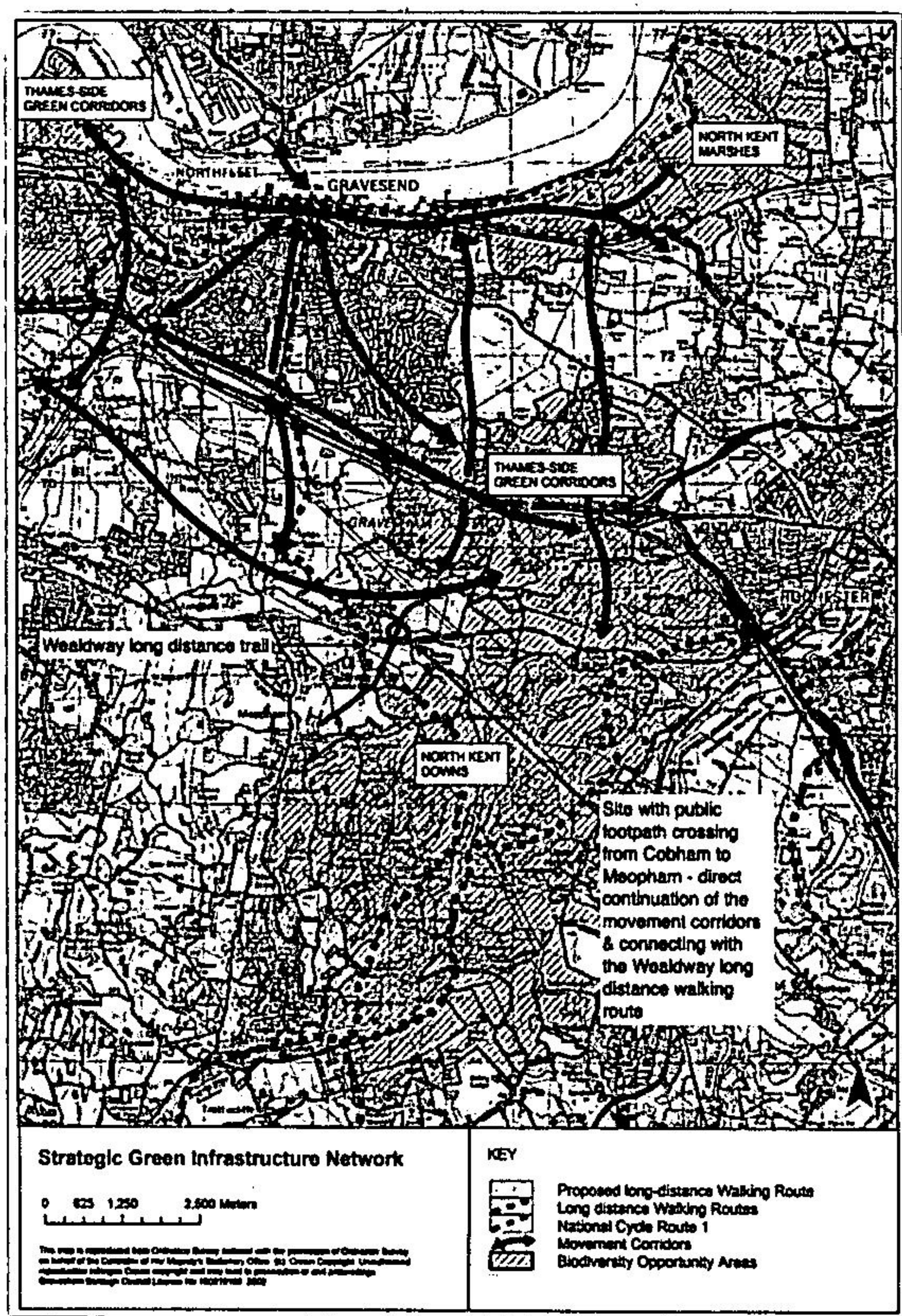
Policy CS02: Scale and Distribution of Development

- 11.1.1** *"4.2.27 In the rural area, development will be supported within those rural settlements inset from the Green Belt and defined on the Policies Map. Development outside those settlements, including affordable housing and proposals to maintain and diversify the rural economy, will be supported where it is compatible with national policies for protecting the Green Belt and policies in this plan. The extent of the Green Belt is defined on the Policies Map."*

Policy CS12: Green Infrastructure

- 11.1.2** *"5.7.22 A multifunctional linked network of green spaces, footpaths, cycle routes and wildlife stepping stones and corridors will be created, protected, enhanced and maintained. The network will improve access within the urban area, from the urban area to the rural area and along the River Thames. The key parts of the network are identified on Figure 19: Strategic Green Infrastructure Network."*
- 11.1.3** *"5.7.26 The overall landscape character and valued landscapes will be conserved, restored and enhanced. The greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting. Proposals will take account of the Kent Downs Area of Outstanding Natural Beauty Management Plan, the Gravesham Landscape Character Assessment, and the Cluster Studies where relevant."*

Figure 19 from the GLPCS (with site and associated green infrastructure added)



- 11.1.4 The public footpath crossing the site is a key component of the green infrastructure improving access from the urban to the rural area, especially so as it connects with an extensive public footpath network south of the site including a key long distance trail, the Wealdway.
- 11.1.5 Although additional hedgerow and tree and shrub belt mitigation is proposed and beneficial to the restoration and strengthening of key landscape elements, i.e., the western boundary hedge and the irregular northern boundary of the field. The tree belt to the south of the proposed winery is disconnected from the existing boundaries and is effectively 'floating' within the field, both visually and from a biodiversity perspective, lacking beneficial connectivity to existing and proposed hedgerow habitats.

Policy CS19: Development and Design Principles

- 11.1.6 *"5.15.14 New development will be visually attractive, fit for purpose and locally distinctive. It will conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area..."*

- *"New development will protect and, where opportunities arise, enhance biodiversity and the Borough's Green Infrastructure network. Support will be given to environmental enhancements where opportunities arise;"*

11.2 KENT DOWNS NATIONAL LANDSCAPE MANAGEMENT PLAN 2021-2026

- 11.2.1 In Chapter 3: Sustainable Development, section 3.1.2 explains the purpose of sustainable development on the National Landscape, i.e.,

"Sustainable development has economic, social and environmental dimensions. In the context of the Kent Downs Area of Outstanding Natural Beauty, sustainability should be judged widely and in accordance with the sustainable development goals but with a focus on the purposes of the AONB designation.

Applying this to the local circumstances of the Kent Downs, particular attention should be given to the special characteristics and qualities of the area and supporting a landscape led approach. These in turn help to apply to a variety of plans, strategies and policy frameworks so that proposals in or affecting the AONB can be judged. The protection afforded to the AONB should be commensurate with the national and international status of the area and give appropriate weight to the AONB's importance. "

- 11.2.2 In Section 3.2 it states that,

"A landscape led approach to design, resource management and development means starting with an understanding of the landscape as a framework for evidence. In a nationally protected landscape the purposes of the designation have to be the driving force when considering or undertaking change. The starting point of achieving landscape led approach is an understanding of the site and its setting, the local landscape character, supporting this it is 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 are key to the approach. Applying best practice and an iterative approach are key in practice to conserve and enhance the natural beauty of the AONB."

- 11.2.3 In Chapter 4: Landform and Landscape Character, section 4.4 explains the main issues, opportunities and threats. Where relevant to this application, these include:

- a. "Loss of and damage to the quality and character of the AONB through the cumulative effect of inappropriate, poorly designed general development, unsustainable land management approaches and land use change, the impacts of growth in visitor pressure."*

b. *"Degradation of the setting and urban fringe impacts in certain Kent Downs landscape character areas through development, infrastructure, urbanisation and recreational pressure."*

11.2.4 In Chapter 6: Farmed Landscape, Section 6.1 Overview and Context, it states that,

"Vineyards are a rapidly increasing component of fruit growing in the Kent Downs Vineyards are often located in prominent positions in the landscape and by their nature tend to be highly visible. Viticulture is a high value, high profile activity, generating relatively high levels of employment when compared with other agricultural uses. Careful vineyard management can present opportunities to create new areas of flower-rich grasslands and species rich hedgerows, however there are often development pressures associated with viticulture, including the establishment of wineries, visitor centres, wire works and provision for workers which can be landscape detractors."

11.2.5 In Section 6.2 Farmed Landscape – Special Characteristics and Qualities, it states that,

"There has been a rapid expansion of vineyard areas in the AONB have been planted with vineyards since the publication of the last AONB Management Plan; subject to market conditions this is expected to continue to grow at a rapid rate and is creating a new character."

11.2.6 In Section 6.3 Farmed Landscape – main issues, opportunities and threats, it states that,

"Farm diversification and development activities such as increased equine facilities, permitted rights afforded to farm building conversions, shooting and field sports, alternative crops (e.g. lavender, biomass energy crops, vineyards) and nonagricultural enterprises (e.g. self-catering cottages, glamping and new uses for traditional farm buildings) can have important detracting impacts as well as benefits to the characteristics, qualities, and rural economy of the Kent Downs."

11.2.7 In Section 6.5 Farmed Landscape – principles, it states in FL5 that,

"Farm diversification activities will be supported if they help achieve the vision, aims and principles of the Kent Downs AONB Management Plan."

11.2.8 In general, it appears that the main policies relate to the more extensive features such as the vineyards within the landscape. However, the design and siting of buildings within the rural landscape is a sensitive one which needs to fit with the landscape character in which it located.

11.2.9 In The Kent Downs National Landscape Management Plan, Section 12 – Access, Enjoyment and Understanding it states that the vision is that,

"The Kent Downs AONB is a place of natural beauty with opportunity and access for all people; they feel welcome to participate in quiet recreation for health, relaxation, enjoyment and for cultural and artistic expression. Improved management ensures that the

Public Rights of Way and much of the highway network is safe, quiet and convenient for walkers, cyclists and horse riders..."

"Policy AEU 3: Diversions and stopping up of PRowS will 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."

"Policy AEU 12: 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."

"Policy AEU 14: Proposals which detract from the amenity and enjoyment of users of the Public Rights of Way network will be resisted."

12 PREVIOUS APPLICATIONS

12.1 APPLICATION FOR A DETERMINATION AS TO WHETHER PRIOR APPROVAL IS REQUIRED:

Delegated Report (Prior Approval): Application 20230899 dated 24.08.2023

Conclusions and Reason for Decision

- *"It is considered that prior approval would be required for the siting and external appearance of the proposed agricultural building because it would be located in a very sensitive location (within the AONB, Green Belt and the Istead Arable Farmlands Landscape Character Area)."*
- *"On the basis of the information submitted, prior approval is refused for the siting and external appearance of the proposed agricultural building. This is because the proposed siting and appearance would be inappropriate and harmful to the landscape. As such, it is considered that the proposed development would be harmful to the openness and natural character of the surrounding Kent Downs Area of Outstanding Natural Beauty, Green Belt and Istead Arable Landscape Character Area and contrary to Policies CS02 and CS12 of the Gravesham Local Plan Core Strategy (2014) and Paragraph 174 of the National Planning Policy Framework (2023)."*
- Recommendation: Prior Approval is required and refused.

Application 20230899, Refused on the following grounds:

- Extract from Paragraph 1: *"it is considered that prior approval would be required for the siting and external appearance of the proposed agricultural building because it would be located in a very sensitive location within the Kent Downs Area of Outstanding Natural Beauty, the Green Belt and the Istead Arable Farmlands Landscape Character Area."*
- Paragraph 2: *"On the basis of the information submitted, prior approval is refused for the siting and external appearance of the proposed agricultural building. This is because the proposed siting and appearance would be inappropriate and harmful to the landscape. As such, it is considered that the proposed development would be harmful to the openness and natural character of the surrounding Kent Downs Area of Outstanding Natural Beauty, the Green Belt and Istead Arable Landscape Character Area and contrary to Policies CS02 and CS12 of the Gravesham Local Plan Core Strategy (2014) and Paragraph 174 of the National Planning Policy Framework (2023)."*

Current Application 20240375 comparison with Application 20230899

- 12.1.1 The current prior approval application has only slight changes from the previous application, including:
- Mitigation planting added.
 - Building moved slightly further from the northern boundary.
 - Reduced glazing on the walls.
 - Addition of roof lights.
 - Reduction in length from 47.00 to 40.50m.
 - Reduction in width from 16.00 to 15.70m.
 - Increase in ridge height from 7.32 to 8.60m (asymmetrical pitched roof).
 - Change from metal wall cladding to black vertical timber cladding.
- 12.1.2 These changes would not address the issue, *"...that the proposed development would be harmful to the openness and natural character of the surrounding Kent Downs Area of Outstanding Natural Beauty, the Green Belt and Istead Arable Landscape Character Area..."*

13 OTHER DOCUMENTS RELEVANT TO LANDSCAPE AND VISUAL MATTERS

13.1 KENT DOWNS AONB SETTING POSITION STATEMENT JANUARY 2018

13.1.1 This is an advice note produced by the Kent Downs AONB Joint Advisory Committee:

"The importance of the Kent Downs AONB setting has been recognised in the Kent Downs AONB Management Plan and its subsequent revisions. This position statement is produced as an advisory document, intended to provide further guidance on issues of setting for local planning authorities, land owners and other interested parties. It has been prepared in consultation with and approved by the Joint Advisory Committee for the Kent Downs AONB. The statement focuses on ensuring avoidance of harm and the conservation and enhancement of the setting of the AONB, through good design and the incorporation of appropriate mitigation measures."

13.1.2 Under Section 5, Development likely to affect the setting of the AONB, it states that:

"Scale, height, siting, use, materials and design are factors that will determine whether a development affects the natural beauty and special qualities of the AONB. Incompatibility with surroundings, movement, reflectivity and colour are also likely to affect impact. In most cases, the further away a development is from the AONB boundary, the more the impact is likely to be reduced,... A development may avoid direct physical effects, but introduce other impacts, such as a greater level of traffic, noise and the characteristics of built development or be located outside of the AONB but increase urban fringe pressures on land in the AONB, potentially affecting land management and the Public Right of Way network."

13.1.3 Some examples of adverse impacts on the setting of the AONB relevant to the proposed winery development include:

- *"development which would have a significant impact on views in or out of the AONB;*
- *loss of tranquillity through the introduction or increase of lighting, noise, or traffic movement or other environmental impact including dust, vibration and reduction in air quality;*
- *introduction of abrupt change of landscape character;*
- *loss or harm to heritage assets and natural landscape, particularly if these are contiguous with the AONB;*
- *development giving rise to significantly increased traffic flows to and from the AONB, resulting in erosion of the character of rural roads and lanes;"*

13.1.4 In Section 7, Conserving and enhancing the setting of the Kent Downs AONB, it states that:

"Many issues can be resolved through careful design and incorporation of appropriate mitigation and/or management measures, such as:

- care over orientation, site layout, height, scale and massing of structures and buildings to minimise impact when viewed from the AONB;*
- consideration not just of the site but also the landscape, land uses and heritage assets around and beyond it;"*

13.1.5 An alternative option for the location of the proposed winery is provided at Appendix 1, which outlines some of the considerations set out for successfully integrating development. Note, this has not been fully assessed but is included for comparison with the proposed site.

13.2 KENT DOWNS AONB LANDSCAPE DESIGN HANDBOOK

13.2.1 Reference to Section 2 AONB-wide landscape design principles for urban edge housing and commercial development and rural settlement development is made above in Section 3: The Proposed Development.

13.2.2 This highlights a number of very key objectives which relate to the proposed development and illustrate that its design, scale and in particular its siting, are contradictory to the design principles set out for the National Landscape (AONB).

13.3 KENT DOWNS NATIONAL LANDSCAPE VITICULTURE TEST & TRIAL FINAL REPORT JUNE 2021

13.3.1 In section 5.2 of the report, the question is asked,

"Can scheme actions help to mitigate the impact of vineyards on landscape character?"

However, the report applies to the vine growing and states the following,

"This question is both complex and, to a degree, subjective. The nature of landscape is that it is the blending of multiple factors such as geology, landforms, human activity, sounds, tranquillity and all of the things that go to make up the uniqueness of place. The growth in viticulture in recent years has been concentrated in certain landscapes. The protected landscapes of the South-East of England now have a disproportionate share of England's vineyards. Changes in landscape are simply a continuation of the changes that have taken place since humans first started shaping their environment. However, sudden, and sometimes dramatic changes, can negatively impact the landscape character of some of our most treasured, and protected, places. The wire work of vineyards, particularly large vineyards, can jar against a gently rolling, open landscape. Wineries, which are outside of the scope of this T&T, can also have a significant impact on landscape character."

13.3.2 Therefore, aside from the final general comment, this report is not considered relevant to the consideration of landscape and visual impacts arising from the proposed development.

13.4

13.4.1 In this correspondence, [REDACTED] has outlined various issues concerned with the visual, noise, smell and traffic generation associated with the proposed winery, with the caveat that the true extent of the development is not known as this is not a full application. The points raised are based on [REDACTED]'s expertise within the wine industry. Many of the points are outside the scope of this review, however there are some aspects which are pertinent to the landscape and visual effects which could arise from the proposed development. These are listed below.

13.4.2 In Section 2: Size of the winery, concerns are raised regarding a number of different operations that would be undertaken at the winery that the proposed building is unlikely to be large enough to accommodate all of these operations and storage, in paragraph j he states that,

"It is also my experience that most producers underestimate the working and storage space they require for their wineries and such things as dry goods, packaging materials, picking containers, empty crates and pallets, all require much more storage space than most realise."

13.4.3 In paragraph k he states that the Vinescape Report:

"talks about a 'covered receivable area' but this is not shown on the plans."

13.4.4 This would have the potential for increasing the overall mass of the building further, as well as increasing outdoor activities at the site, impacting on the levels of tranquillity.

13.4.5 In paragraph l, he states that,

"The area allowed for the 'tractor and vineyard equipment' both inside the winery (around 45 m²) and external hard standing is clearly inadequate for the scale of the operation being proposed."

13.4.6 In Section 3, Visual, he states that,

"a. The winery is badly sited being prominent in a valley and village boundary setting, and to the detriment of local residents with regard to commercial activity, noise and traffic movements. There is no agricultural or winemaking need for the winery to be built where it is proposed..."

13.4.7 This view is reinforced by the review of the LVEIA and the anticipated visual and landscape impacts associated with the elevated location.

13.4.8 In paragraph b, he states that,

"The internal access from the existing field gate via a considerably long internal track to the winery building, where it is badly sited next to residential properties, is without agricultural purpose and increases the impact of traffic and disturbance."

13.4.9 Although this does not form part of this application, this is an important consideration of the effects arising from the whole development and one which could have additional impacts, in addition to the working operations of the winery building with direct impacts on walkers using the public footpath NS190.

13.4.10 In paragraph c, he states that,

"As the area is highly regarded for its unspoilt natural beauty, the applicant could do more to shield the site, wherever it is sited. Arrivals and departures from customers, suppliers and employees will become noticeable in a tranquil rural area. More could also be done with earth berms and with tree planting to shield the winery wherever it is sited. Given that some underground storage is proposed, this could be extended to provide more storage space, without expending the footprint of the building."

13.4.11 The description of the landscape is correct and the impacts of movement on a tranquil landscape, but much more careful consideration of the siting and mitigation of the winery is required. Extending the basement area would have further impacts on the landscape element of topography and soils and result in greater fill material used on site, affecting the natural landform. Earth berms can themselves become intrusive and alien features in a sensitive landscape. The development needs to be landscape led in a sensitive, designated landscape, to ensure that the development and the associated mitigation contributes to the wider beneficial characteristics of the landscape.

13.4.12 In Section 6. Traffic to and from the site, there are a number of unknown scenarios, but which will have impacts on visual receptors, e.g. residents, walkers local road users and periodically affect tranquillity and the still character of the rural landscape, especially as the access to the building will be visible from the footpath network to the south if utilising the existing gateway to reach the winery to the north-west of the field.

14 CONCLUSIONS

- 14.1.1 The proposed winery development would occur on land in the original location which has been previously refused. There are minor differences in the proposals but essentially the development is fairly similar.
- 14.1.2 Mitigation planting has been proposed in this application, however, the proposed mitigation, i.e., planting of the western site boundary line and the belts of tree and shrub understorey planting will have a detrimental impact on the currently experienced openness of the landscape views from Sole Street, across the pastureland to the Kent Downs on the eastern horizon, which is a highly valued view by residents and considered unique to villages in and around the National Landscape. Therefore, the combination of the mitigation and the proposed building would infill part of the open views out of and towards the village from the public footpath NS190. This is contrary to The Kent Downs AONB Landscape Design Handbook to avoid edge developments which impact on views in and out of the National Landscape.
- 14.1.3 The building is located at the most elevated and prominent part of the site. This is contrary to The Kent Downs AONB Landscape Design Handbook which advises buildings to be located to avoid sensitive ridgelines and distinctive landscape settings and GLPCS Policy CS19, where new development will *"conserve and enhance the character of the local built, historic and natural environment, integrate well with the surrounding local area..."* Also, in the Kent Downs AONB Setting Position Statement, it cites adverse impacts on the setting of the National Landscape, including, *"development which would have a significant impact on views in or out of the AONB"*
- 14.1.4 The assessment of landscape sensitivity is considered to be reasonably accurate, however when the results of the public consultation survey are added to the assessment process, it is clear that there is a value placed on the local landscape. This review finds that some of the landscape components i.e., Vegetation & Nature Conservation, Perceptual Qualities and Access & Recreation were underassessed in the light of local perspectives and considers their sensitivity to be Medium not Medium-Low, High not medium-High and High not Medium respectively. There is agreement on the High sensitivity for Topography & Soils and Kent Downs National Landscape and Green Belt. The county-wide Kent Landscape character assessment describes the landscape as having a high sensitivity, whereas the local Gravesham landscape assessment describes the sensitivity as Moderate. These assessments are 15 years or older and potentially the sensitivities of the landscape have changed in that time, with different and varying pressures on the rural landscape.
- 14.1.5 The landscape character assessments repeatedly refer to the landscapes' intimate landscape with occasional long views where the landscape opens out / deeply rural / a tranquil landscape with a peaceful and remote feel / few detracting features. These descriptions are echoed in some of the survey responses.
- 14.1.6 The assessment of the magnitude of landscape effects is considered to be reasonably accurate, however because of the raising of some of the values for landscape components,

informed by public views about the landscape this inevitably has an effect on the overall impact of the proposed development (significance). Aside from Vegetation & Nature Conservation, all other components were considered to be underassessed, with Topography & Soils, Kent Downs National Landscape and Green Belt, Perceptual Qualities and Access & Recreation potentially significantly affected with an assessed level of Major-Moderate adverse effects.

- 14.1.7 The Methodology for assessing value for visual effects although clearly set out, appears not to have been followed through. Although there were no public consultations at the time of the LVEIA to draw conclusions on the local perspectives of the values of landscape and public footpaths, the assessment appears to have based value on the limited factors of whether the visual receptor is within or outside a designated landscape. This is restrictive, as there are likely to be highly valued views outside designated landscapes as much as less valued views within designated landscapes, even in the absence of the public survey, there will be variations in the viewpoint setting and content, which will have some influence on the value of views.
- 14.1.8 The majority of views are assessed to be of Medium-High Sensitivity, with viewpoints 8 and 14-22 being of High sensitivity where these are located on footpaths – particularly footpath NS190 which passes through the field just to the east of the development.
- 14.1.9 It is considered that the magnitude of visual effects has in several cases been underassessed, however this conclusion has arisen from the information within the public consultation, which clearly indicates not only a high value put on the landscape and in particular the local footpaths (and the quiet network of lanes), but the impact that the change to the view would have, where currently this is a rural landscape with extremely limited views of buildings other than filtered glimpses of some houses in Sole Street, is perceived to be more significant because of its impact on key views, but importantly on other senses, particularly noise. Tranquillity of the area and footpaths was a very highly valued characteristic as was the purely rural outlook untainted by buildings.
- 14.1.10 Another factor, which is not the subject of this application, which focuses only on the winery building itself, are the potential impacts which would be associated with the full development. There are many unknown elements, associated with the development which would require speculation, and therefore these aspects are not considered here. However, there are more certain aspects of the development which could also have significant effects on the landscape and visual receptors, i.e., the proposed access to the winery, and it is considered appropriate to take into consideration the potential effects of this element as the building will not exist in isolation with no access and the potential impacts would extend the effects further into the countryside and closer to the public footpath. Also, in the Kent Downs AONB Setting Position Statement, it clearly states that, "*A development may avoid direct physical effects, but introduce other impacts, such as a greater level of traffic, noise and the characteristics of built development.*" These aspects of the development are therefore considered to be important to fully assess a development.

- 14.1.11 It is assumed this would be via the existing field access, this would have a conflict with the public footpath NS190 crossing the field between the gateway and the proposed winery. The impacts of this would therefore be highly significant given the value afforded the footpaths, views and landscape experiences from it. It is therefore considered that there would be High-medium adverse magnitude for viewpoint 14 where the footpath passes by the proposed development, not as previously assessed at Low Adverse Magnitude. This would result in a Major-Moderate overall effect. Similarly, the viewpoint from the footpath moving south of the site, looking back across the open rural landscape, with no prominent buildings within the wide view, are considered to have been underassessed, with a magnitude of Medium reducing to Low adverse at the greater distance, with an overall visual effect of Major-Moderate to Moderate Adverse. The footpath and its wider links to the PROW network including the long-distance trail – The Wealdway just south of the site, contribute positively to the Strategic Green Infrastructure Network, where it is important to conserve and enhance routes where they exist.
- 14.1.12 Within Sole Street village, the rural landscape setting created by the pastureland sitting between the site and the eastern edge of the village is highly valued for providing an open view towards the Kent Downs (across the site in). Without the local information regarding these views (11-13), the assessed value is lower, and the overall visual effects underestimated. These views are considered to have Medium Adverse Magnitude effects resulting in a Major-Moderate Adverse effect overall. The loss of the open view across the countryside would be contrary to the aims of maintaining the openness of the Green Belt.
- 14.1.13 The public consultation survey written responses offer a valuable insight into the local perceptions of the landscape value, based on experience, which should not be underestimated in the decision-making process as they are a complimentary part of the assessment process which is difficult for professional judgements alone to convey.

The Kent Downs National Landscape Landscape Character Assessment makes recommendations for managing the landscape within the Luddesdown local character area, which includes,

- “Protect the deeply rural character of the area, resisting development which gives it a more urbanised character. This includes retaining the character of rural lanes.”
- “Ensure that any new development around historic villages respects the scale, layout, massing and materials of existing buildings, and also their relationship with the landform.”

It is considered that the proposed scale, elevated location within the field, and the required mitigation planting would give rise to some significant landscape and visual effects, which are contrary to the many sources of guidance for this landscape character area and within the Kent Downs National Landscape and compromise the openness of the Green Belt. This is contrary to Policy CS12 green Infrastructure where the “greatest weight will be given to the conservation and enhancement of the landscape and natural beauty of the Kent Downs Area of Outstanding Natural Beauty and its setting.”

The proposed development is also considered to be contrary to the landscape-led approach advocated in the Kent Downs National Landscape Management Plan, i.e., *"understanding of the site and its setting, the local landscape character, supporting this it is 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 are key to the approach."*

15 **REFERENCES**

- Gravesham Stage 2 Green Belt Study Final Report 2020
- Gravesham Landscape Character Assessment 2009
- Kent Downs National Landscape Management Plan 2021-2026
- Kent Downs National Landscape Viticulture Test & Trial Final Report June 2021
- Kent Downs National Landscape - Landscape Character Assessment Update 2020
Revised and Published 2023;
- Kent Downs National Landscape Farmstead Guidance
- Kent Downs AONB Landscape Design Handbook
- Kent Downs AONB Setting Position Statement 2018
- Landscape Assessment of Kent 2004.
- Landscape & Visual Evidence & Appraisal: Vol. 1 - Landscape & Visual Evidence & Vol.
2 Landscape & Visual Impact Appraisal September 2004 (Terra Firma)
- National Planning Policy Framework (2023)
- [REDACTED]