

From: [Katie Miller](#)
To: [Planning Applications - GT](#)
Subject: KCC/GR/0140/2022 Trosley Country Park, Waterlow Road, Vigo, Gravesend, Kent, DA13 0SG
Date: 04 August 2022 11:50:53
Attachments: [image002.png](#)
[image003.png](#)
[image004.png](#)

Dear Chloe

Thank you for consulting the AONB Unit on the above application.

The Kent Downs AONB Unit is currently experiencing unprecedented levels of major planning related work and is therefore unable to provide a detailed response on the application. This does not indicate that the AONB Unit considers the proposal would not impact on the statutory purposes of AONB designation and it is the responsibility of the Council to decide whether the application meets legislative and policy requirements in respect of AONBs.

The local planning authority has a legal duty to take account of the purposes of AONB designation in determining the application i.e. the conservation and enhancement of the area's natural beauty. In addition to consideration of the proposal against the local authority's development plan, account should be taken of paragraph 176 of the NPPF and the policies and objectives of the [Kent Downs AONB Management Plan](#). The Management Plan is adopted by all the local authorities in Kent as their policy for the management of the AONB and for the carrying out of their functions in relation to it. The national [Planning Policy Guidance](#) confirms that AONB Management Plans can be a material consideration in determining planning applications.

We note that the works have taken place within an area of Ancient Woodland, which may be affected by this development. Ancient woodlands are irreplaceable. They have great value because they have a long history of woodland cover. It is Government policy to refuse development that will result in the loss or deterioration of irreplaceable habitats including ancient woodland, unless "there are wholly exceptional reasons and a suitable compensation strategy exists" (National Planning Policy Framework paragraph 180). One of the most important features of ancient woodlands is the quality and inherent biodiversity of the soil; they being relatively undisturbed physically or chemically. This applies both to Ancient Semi Natural Woodland (ASNW) and Plantations on Ancient Woodland Sites (PAWS). The Kent Downs AONB Management Plan identifies as an aim in the Woodland and Trees section that 'The irreplaceable fine tree and ancient woodland characteristics and qualities, cultural heritage and landscape character is restored, conserved and enhanced.'

We therefore consider it essential that any impacts on the Ancient Woodland are considered appropriately when assessing the application.

I hope this is of assistance to you. I would be happy to discuss further if this would be helpful.

Kind regards

Katie Miller MRTPI
Planning Manager

I work part time, usually Monday to Wednesday. I am currently mainly working from home, please contact me by email.

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