

20221293 Cascades Leisure Centre, Thong Lane, Gravesend, Kent DA12 4LG
Kent Downs Area of Outstanding Natural Beauty Unit 7 December 2022
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 paragraphs 176 and 177 of the NPPF and the principles and objectives of the [Kent Downs AONB Management Plan, Third Revision](#) 2021 to 2026. 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 [PPG](#) confirms that AONB Management Plans can be a material consideration in determining planning applications.

The site lies to the north of the AONB. The LVIA submitted with the application includes a single Viewpoint from the AONB as shown on the ZTV map, however no photograph is included in this document and the only reference to potential AONB impacts is in Appendix 3 - ASSESSMENT OF LANDSCAPE EFFECTS – where it is advised 'However, the scale/nature of the Proposed development and its remoteness from the AONB result in no intervisibility or other potential influences.'

While the AONB occupies higher ground, there would appear to be limited opportunities for visibility of the site from the AONB, with the exception of one or two points on Shorne Ifield Road where breaks in roadside vegetation do allow for views towards the application site. As views of the site would be filtered by existing trees around the perimeter, and the fact that development in this location would be seen within the context and backdrop of extensive existing built development and urban infrastructure, we consider any potential opportunities for impacts on the setting of the AONB to be relatively low.

However, it is noted that the change in location of the building and the increase in height may result in the replacement facility being more visible than the existing in views from the AONB. The proposed variation in roof form and elevations which will help break up the perceived mass of building and is therefore welcomed. The proposed elevational treatment on the south and east elevations (those with potential to impact on the AONB) include aluminium powder coated colour cladding. We would recommend ensuring the colour and tone of the panels helps integrate the building into the landscape and would refer you to our [Guidance on the Selection and Use of Colour in the Kent Downs AONB](#) and in particular, page 32 which covers setting. In order to minimise potential impacts of the proposed vertical 'Random LED lit strips' on night time effects from the AONB, appropriate controls should be applied.

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