

From: Katie Miller <Katie.Miller@kentdowns.org.uk>
Sent: 21 June 2023 14:44:53 UTC+01:00
To: "Planning Admin" <planning.admin@gravesham.gov.uk>
Subject: 20230541 Land To The East Of, Brookers Farm, Luddesdown Road, Luddesdown

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Dear Katherine

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

The Kent Downs AONB Unit is currently involved in a major Public Inquiry in Medway (incidentally by the same applicant) and is therefore unable to provide a detailed response to planning application consultations at the moment. 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 is located within the [West Kent Downs Landscape Character Area of the Kent Downs LCA Update](#) 2020 and within the Luddesdown Sub Area. Summary characteristics of this Character Area include the dip-slop landform of dry valleys running north-south, interspersed with broad, undulating ridges and plateaux; extensive blocks of woodland, as well as strips on valley sides with the topography and woodland restricting views in much of the area, but with occasional long views along valleys. In respect of the Luddesdown sub area it is stated that '*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*'.

Landscape Management Recommendations within the LCA include:

- Protect the deeply rural character of the area, resisting development which gives it a more urbanised character
- Protect the enclosed landscapes of the dry valleys formed by the steep valley sides and numerous woodland blocks

- Manage the extensive new vineyard areas to maximise the potential to enhance landscape and biodiversity
- 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.

The site is located on the bottom of a dry valley and as such is in a particularly sensitive location, as dry valleys were one of the main targets of the AONB designation and are noted specifically as being one of the components of the 'dramatic landform and views' special qualities of the Kent Downs AONB.

The proposed works have taken place in a remote and rural location, away from any existing infrastructure and buildings associated with the farm. The engineering works have facilitated an approximately 325m length of access track, roughly parallel with the existing lane plus with a further spur track up the valley side and a large area of hard standing of 792m, sitting slightly elevated above the road which neither conserves nor enhances the AONB. The track is required to facilitate access to a compost and organic fertilizer storage area which includes open storage of large plastic bags, pale in colour with a shiny surface which contrast with the open rural surroundings and stands out as an unnatural additional that fails to conserve or enhance this part of the AONB. While ecological and landscape works are proposed, and the ecological benefits of these works is noted, the proposed mitigation will only have limited impacts in filtering or screening views of the works, particularly in winter months when the trees/hedgerow are not in leaf.

It is not considered that the proposal meets the key policy test of conserving and enhancing the landscape and scenic beauty of the Kent Downs AONB, nor complies with the landscape management recommendations set out in the LCA above and as such the AONB Unit does not support the application. It is considered that a less sensitive part of the holding should be found to facilitate the storage area, preferably clustered with existing physical infrastructure where there would not be the same landscape and visual impacts and that the application should be refused and the land returned to its former state.

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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