

20231110 Land At Brookers Farm Luddesdown Road

Kent Down 28 November 2023

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 AONB Unit provided a consultation response to a previous similar application (20230181) on the 29/03/2023. The application varies from the refused one by a minor reduction in number of spaces and the incorporation of an indicated number of two trees in the central landscape belt.

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. Landscape proposals should reflect local character, using appropriate form, structure and species.

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 applicant has sought to moderate the effects of the proposal and has incorporated additional landscaping from the previous scheme.

Nevertheless, the proposal would still introduce a relatively urbanising feature into this highly sensitive and rural landscape that would impact on the landscape and scenic beauty of the Kent Downs AONB.

If the Council is minded to accept the principle of the proposal, should permission be forthcoming we would recommend imposing conditions restricting any external lighting to ensure the dark night skies and tranquillity of the AONB are maintained, in accordance with Principle SD7 of the Management Plan. We would also request that the trees proposed in the central landscaped area and within the hedgerow around the perimeter of the parking area are varieties that have the potential to form large crowns to ensure impacts are minimised as far as possible.

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