

20221121 Land North Of Wildacre Sole Street

Kent Downs Area of Outstanding Natural Beauty Unit 2 November 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 principle of whether the proposal lies within the settlement boundaries and complies with policies relating to sustainable development and the Green Belt in Gravesham's Local Plan are for the judgement of the Council. In respect of AONB impacts, we consider the site to be relatively well contained within the wider landscape and to relate well to existing settlement pattern and consider that subject to an appropriate design, a new dwelling on the site could be provided while meeting AONB objectives. The proposed design of the dwelling is contemporary in nature and while we raise no objection in principle to contemporary design, buildings in the AONB need to adopt a design approach that fits with and complements the values, traditions, forms and patterns of the past, adopting a contemporary interpretation of local vernacular. In our view, the proposed design fails to achieve this, with the only interpretation of local vernacular being a limited use of timber cladding.

The proposed use of slate as a roofing material is of particular concern, especially combined with the extensive use of render; traditional materials in the Kent Downs are bricks and clay tiles, with predominantly rich hues of reds and oranges with occasional use of burnt headers and flint. These prevailing materials are a product of the underlying geology and their use embeds local distinctiveness in the built fabric of the Kent Downs. This distinctiveness began to be eroded in the mid-19th century with the advent of the railways enabling the use of imported materials such as slate and buff/yellow brick, as is demonstrated with nearby development in the village. This dilution of local distinctiveness is harmful to the character of the Kent Downs and should not be exacerbated by the use of non-local materials in new developments. Use of the right local materials is a key factor in creating a development that is truly 'of the place' and is considered particularly important where a non-traditional form of building is proposed, as is the case here, to provide some reference and connection to the local vernacular. We note that there is a small area proposed with 'stone slips' but no further detail is provided, so we are unable to comment on the appropriateness of this material.

Should the principle of a residential development be considered acceptable, we would therefore request that the materials palette is reviewed.

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

Gravesham Borough Council