

# **Land West of Ashgrove Road, Sevenoaks**

Area of Outstanding Natural Beauty (AONB) Appraisal  
September 2022

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Version: 4.0  
 Version date: September 2022  
 Comment Final

This document has been prepared and checked in accordance with ISO 9001:2015.

## 1.0 Introduction

### 1.1. Background

LDA Design was commissioned in March 2022 to provide landscape design and assessment services in relation to the proposed residential development on the land west of Ashgrove Road, Sevenoaks (the 'Site'), on behalf of Sigma Strategic Land Limited.

Sigma Strategic Land Limited promoted the Site to Sevenoaks District Council during its Call for Sites in January 2022. The Site has been promoted with an indicative capacity of 47 dwellings as an edge of settlement Site and as a sustainable and logical extension to Sevenoaks.

The Proposed Development comprises an Outline Planning Application (OPA) for 50 homes, together with associated green infrastructure. All matters are reserved except for access.

The Site is located fully within the Kent Downs Area of Outstanding Natural Beauty (AONB), the purposed of which is to conserve and enhance the natural beauty of the area.

This AONB Appraisal seeks to establish the legislative and policy context for the AONB; the natural beauty criteria and special qualities that are specific to the Kent Downs AONB; how the Site contributes or detracts from these characteristic; and the potential for adverse effects on the natural beauty of the AONB resulting from the Proposed Development. Finally, it identifies how such adverse effects could be avoided or mitigated and how new development at the Site could conserve and enhance the areas natural beauty.

In defining the natural beauty of the AONB, reference is made to published material, and in particular the Kent Downs AONB Management Plan and Kent Downs AONB website.

LDA Design is the principal author of this appraisal which has been prepared through a combination of desk based studies and field work. LDA Design is grateful for the contributions from the following technical experts

- Urban Edge Environmental Consulting (ecology)
- Asset Heritage Consulting (cultural heritage)
- Motion (transport)
- Drainage (Odyssey)

This appraisal is not a full Landscape and Visual Impact Assessment (LVIA), and should not be read as such. A detailed assessment of the effects of development at Ashgrove Road on the Kent Downs AONB would be undertaken in accordance with best practice guidance published by the Landscape Institute and Institute of Environmental Management and Assessment and submitted with the planning application. The LVIA would draw on a range of information, including published landscape character assessments, Zone of Theoretical Visibility Studies and Site analysis. This appraisal would also be referenced where relevant.

The High Weald AONB Unit were approached in April 2022 in order to consult on the emerging proposals and ensure the scheme sensitively responds to the AONB context. Unfortunately the AONB Unit were not supportive of a development in this location and therefore did not consider it appropriate to enter into pre-application discussions.

## 1.2. Site Location and Context

The Site is located to the south-west of Sevenoaks, between Ashgrove Road to the east and Oak Lane to the west, and adjoining the existing settlement edge. **Figure 1** places the Site in its local context.

The Site comprises a single field parcel of rough grassland pasture, which is accessed via a neighbouring field to the south. The Site extends to around 2.3ha.

**Figure 2** places the Site in its immediate context and illustrates that the Site's boundaries are defined by a combination of vegetation (comprising native trees, shrubs and hedgerows). As shown on **Figure 2**, there is a small area of tree planting to the south-east corner of the Site and a small overgrown pond along the eastern Site boundary.

**Figure 2** also labels key features within the vicinity of the Site, including Public Rights of Way (PRoW) and local roads referred to within the LVIA.

The Site's boundaries are defined as follows:

- To the north, the Site adjoins existing residential properties (comprising detached and semi-detached dwellings situated between Oak Lane and Ashgrove Road), delineated by close-board fencing and rear garden hedgerows. Further north lies numerous residential properties to the east of Brittain's Lane, alongside The New Beacon School to the west of Brittain's Lane. Immediately to the north-west of the Site lies a small collection of agricultural fields, associated with isolated properties / buildings, beyond which lies woodland. Further north lies two expansive and well-established woodlands – Great Britain's Wood and Mill Bank Wood.
- To the east, the Site abuts Ashgrove Road, along which lies a row of residential properties which form the southern-eastern extent of the built-up area of Sevenoaks. Beyond this the residential area extends north-eastwards towards the town centre.
- To the south, the Site adjoins another field, marked by a row of tree / shrub planting and a post-and-wire fence. Further south, the landscape comprises some isolated properties (with expansive curtilages), which are surrounded by well-established woodland (which are unnamed).
- To the west, the boundary of the Site is delineated by a combination of well-established tree and shrub vegetation that line Oak Lane. To the immediate west of Oak Lane lies a small collection of agricultural fields, associated with a nearby two properties along Oak Lane. These fields border Mill Bank Wood and A21 / Sevenoaks Bypass, which is a strategic route north-south, connecting London / M25 to Hastings on the south coast.

Oak Lane and Ashgrove Road are relatively narrow and partly sunken lanes, defined for much of their length next to the Site by hedgerows and established hedgerow trees. Historic mapping<sup>1</sup> indicates that this pattern of roads and field boundaries has been established for over a century. The Sevenoaks Residential Character Area Assessment

<sup>1</sup> Scottish National Library Map Finder

<https://maps.nls.uk/geo/explore/#zoom=18&lat=51.25939&lon=0.17891&layers=168&b=1> (accessed 20 May 2022)

identifies this area of the town as being within the Hopgarden Lane Area. This records development was laid out from the 1930's onwards with many houses developed in the 1960s.

The Site is located fully within the extent of the Kent Downs Area of Outstanding Natural Beauty and the Metropolitan Green Belt, as shown on **Figure 3**.

The Site contains no Tree Preservation Orders and is not within a Conservation area. There are no public rights of way or cycling routes within the Site, and the land is not designated for its heritage or biodiversity value. It contains no Listed Buildings or locally listed heritage assets and is not Registered Common Land.

**Figure 4** presents the topography of the Site and its wider context. In general, the topography of the Site and its surroundings is characterised by an undulating landform, that broadly rises to a local ridgeline that is formed around Goathurst Common, Bayley Hill and Hubbard's Hill.

The surrounding residential areas sits a similar elevation as the Site, with the south-western edge of Sevenoaks extending up the base of the ridge, before giving way to steeper ground and areas of woodland. However, to the south of Sevenoaks, the urban area does encompass higher ground around Weald Road and Tonbridge Road.

The Site itself comprises some gentle undulations, generally falling from west to east. The highest area of landform is located within the south-western corner, at approximately 170m Above Ordnance Datum (AOD). It falls towards the eastern extent the Site, with is at 158m AOD. Along the Site's eastern and western boundaries, there are in places a difference in levels, up to 2m in height (approximately) between the Site's field and the adjoining road. Where this occur, steep vegetated embankments are found.

## 1.3. Structure of this Appraisal

Following this Introduction, the appraisal is structured as follows.

**Section 2** presents a summary of the legislation, national policy and planning policy guidance relevant to AONBs, and includes details of the 'Duty of Regard'. Reference is also made to the Colchester Declaration.

**Section 3** provides an overview of the designation history of the Kent Downs AONB, local policies that apply to the AONB and relevant position statements and guidance. Reference is also made to the Kent Downs AONB Management Plan.

**Section 4** provides a brief introduction to 'natural beauty' and describes the natural beauty (and special qualities) indicators of the Kent Downs AONB.

**Section 5** presents a high level appraisal of the effects of development at the Site on the Kent Downs AONB.

A summary and conclusions are presented in **Section 6**.

## 2.0 Legislation and National Policy Context for AONBs

### 2.1. Statutory Framework<sup>2</sup>

The statutory framework for protected landscapes in England was first established in the National Parks and Access to the Countryside Act 1949 (NPAC 1949). The legislation has been amended and added to many times since then. Today, land to be included in an AONB (or National Park) must meet the statutory designation criteria that are set out in the Countryside and Rights of Way Act 2000 (or National Parks and Access to the Countryside Act 1949 (for National Parks).

Section 82(1) of the Countryside and Rights of Way Act 2000 (CROW) defines an AONB in England as an area that is not in a National Park but which appears to Natural England to be of such outstanding natural beauty that it is desirable that the protective provisions of Part IV of CROW should apply to it for the purpose of conserving and enhancing the area's natural beauty.

Some further clarification is provided in the legislation:

- Reference to conservation of natural beauty includes conservation of its flora, fauna and geological and physiographical features (s.92(2) of the CROW Act).
- Land is not prevented from being treated as of natural beauty by the fact that it is used for agriculture, or woodlands, or as a park, or that its physiographical features are partly the product of human intervention in the landscape (s.99 NERC).
- AONB purposes do not include promoting understanding and enjoyment of the area's special qualities except in the case of AONB Conservation Boards. In practice local authorities in many AONBs make a big contribution to promoting understanding and enjoyment; however, it is not a statutory purpose that can be taken into account at designation.

Section 85, Part IV of the CROW Act requires that *"In exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty, a relevant authority shall have regard to the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty."*<sup>3</sup> The duty to 'have regard' (to the purpose of conserving and enhancing natural beauty) is discussed further in Section 2.2. below.

### 2.2. Duty of Regard

In 2010 Natural England published guidance for relevant authorities whose activities affect AONBs, National Parks and the Norfolk and Suffolk Broads<sup>4</sup>. The guidance is a complementary publication to the 2005 Defra guidance note<sup>5</sup> which it builds on by

<sup>2</sup> [https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb/supporting\\_documents/Guidance%20for%20assessing%20landscapes%20for%20designation%20as%20National%20Park%20or%20AONB%20in%20England.pdf](https://consult.defra.gov.uk/natural-england/suffolk-coast-and-heaths-aonb/supporting_documents/Guidance%20for%20assessing%20landscapes%20for%20designation%20as%20National%20Park%20or%20AONB%20in%20England.pdf) (accessed 11 May 2022)

<sup>3</sup> Section 82(1-3) of the Countryside and Rights of Way Act 2000 (CROW) clarifies what persons or bodies constitute a 'relevant authority'

<sup>4</sup> Natural England (2010) England's Statutory Landscape Designations: A Practical Guide to Your Duty of Regard <https://cranbornechase.org.uk/wp-content/uploads/2020/02/DutyofRegard20101.pdf> (accessed 11 May 2022)

<sup>5</sup> Defra (2005) Duties on relevant authorities to have regard to the purposes of National Parks, Areas of Outstanding Natural Beauty (AONBs) and the Norfolk and Suffolk Broads Guidance Note ([https://landscapesforlife.org.uk/application/files/2015/8928/8605/Duty\\_of\\_Regard\\_Guide\\_Defra\\_2005.pdf](https://landscapesforlife.org.uk/application/files/2015/8928/8605/Duty_of_Regard_Guide_Defra_2005.pdf)) (accessed 11 May 2022)

explaining in greater detail the nature and purpose of the 'have regard to' duty and provides practical examples based on case studies of good practice.

In the introduction, the guidance states the purpose of the various designations. For AONBs it stipulates that the purpose is to conserve and enhance the natural beauty of the area. It also states that *"like all local authorities, AONB managing authorities (including Conservation Boards) have a responsibility to foster the social and economic wellbeing of local communities."* It goes on to note that *"Conservation Boards have an additional responsibility to increase public understanding and enjoyment of the special qualities of the AONB, with greater weight on conservation if there is a conflict."*

The guidance states that the *"use of the word duty in the legislation means that having regard to AONB/National Park purposes is something all 'relevant authorities' must do: it is not discretionary"* (a point reinforced by the use of the word 'shall', rather than for example, 'may'). It goes on to record that the legislation is clear in identifying the circumstances in which this duty must be fulfilled, i.e. in *"...exercising or performing any functions in relation to, or so as to affect land..."* in an AONB (or National Park).

The guidance states that the duty applies to all decisions and activities that may affect land within an AONB (or National Park) and *"...not just to those that relate to planning, countryside and related environmental issues. It should be noted that activities undertaken outside AONB/ National Park boundaries may affect land within them."*

The guidance goes on to record that the meaning of 'have regard to' *"lies at the heart of this duty."* It adds that dictionary definitions of 'regard' focus on interpretations such as 'to consider' and to 'take into account' and 'to heed'. Following the presentation of a relevant debate on the meaning of 'have regard to' (the Attorney General, Lord Goldsmith at a meeting of the Lord's Grand Committee on 6<sup>th</sup> February 2006), the guidance lists what the duty to 'have regard to' means in practice:

- *"Decisions and actions taken by relevant authorities will invariably require a wide range of factors and issues to be taken into account."*
- *The duty requires that this process should include consideration of potential impacts on AONB/National Park purposes – with the expectation that adverse impacts will be avoided or mitigated where possible."*
- *Provided this is done, the duty has been met, irrespective of whether or not the decision ultimately taken conflicts with AONB/National Park purposes."*

It goes on to state that

*"we consider it good practice that a body:*

- *considers the duty of regard at several points in any decision-making process or activities, including during initial thinking, at more detailed planning stages, and at implementation; and*
- *provides written evidence that they have had regard and considered whether it is or is not relevant."*

The Kent Downs AONB Management Plan confirms that Section 85, Part IV of the CRow Act requires all public bodies, statutory undertakers and relevant authorities to demonstrate that they have taken account of the purposes of the AONB in their decision making. It adds that the Kent Downs AONB partnership has prepared a series of guidance documents, which support the Management Plan and inform and provide practical ways

for organisations and individuals to implement their Duty of Regard. It adds that in support of the Duty of Regard several Public Bodies and Statutory undertakers have either signed Joint Accords or have developed practical projects to deliver the conservation and enhancement of Natural Beauty on the ground. Notable amongst these are the Forestry Commission, Natural England and UK Power Networks.

## 2.3. National Planning Policy and Guidance

### 2.3.1. National Planning Policy Framework<sup>6</sup>

The National Planning Policy Framework (NPPF) was revised on 20 July 2021 and sets out the government's planning policies for England and how these are expected to be applied. The revised NPPF replaces the previous National Planning Policy Framework published in March 2012, revised in July 2018 and updated in February 2019.

Paragraph 176 of the NPPF refers to protected landscapes including AONBs. It states that

*"Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas."*

Paragraph 177 adds that

*"When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:*

- a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;*
- b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and*
- c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated."*

### 2.3.2. Planning Practice Guidance (Natural Environment)

The 'Natural Environment'<sup>7</sup> section of the Planning Practice Guidance Explains key issues in implementing policy to protect and enhance the natural environment, including local requirements.

Guidance specific to protected landscapes follows

Paragraph 39 states that:

<sup>6</sup> <https://www.gov.uk/guidance/natural-environment> (accessed 11 May 2022)

<sup>7</sup> <https://www.gov.uk/guidance/natural-environment> (accessed 11 May 2022)



*“Section 11A(2) of the National Parks and Access to the Countryside Act 1949, section 17A of the Norfolk and Suffolk Broads Act 1988 and section 85 of the Countryside and Rights of Way Act 2000 require that ‘in exercising or performing any functions in relation to, or so as to affect, land’ in National Parks and Areas of Outstanding Natural Beauty, relevant authorities ‘shall have regard’ to their purposes for which these areas are designated. A list of the public bodies and persons covered under ‘relevant authorities’ is found in Defra guidance on this duty, and Natural England has published good practice guidance.*

*This duty is particularly important to the delivery of the statutory purposes of protected areas. It applies to all local planning authorities, not just National Park authorities, and is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on their setting or protection.”*

Paragraph 40 adds:

*“Management plans for National Parks, the Broads and Areas of Outstanding Natural Beauty do not form part of the statutory development plan, but they help to set out the strategic context for development. They provide evidence of the value and special qualities of these areas, provide a basis for cross-organisational work to support the purposes of their designation and show how management activities contribute to their protection, enhancement and enjoyment. They may contain information which is relevant when preparing plan policies, or which is a material consideration when assessing planning applications.”*

Paragraph 41 specifically addresses how development in protected landscapes should be approached. It states:

*“The National Planning Policy Framework makes clear that the scale and extent of development in these areas should be limited, in view of the importance of conserving and enhancing their landscapes and scenic beauty. Its policies for protecting these areas may mean that it is not possible to meet objectively assessed needs for development in full through the plan-making process, and they are unlikely to be suitable areas for accommodating unmet needs from adjoining (non-designated) areas. Effective joint working between planning authorities covering designated and adjoining areas, through the preparation and maintenance of statements of common ground, is particularly important in helping to identify how housing and other needs can best be accommodated.*

*All development in National Parks, the Broads and Areas of Outstanding Beauty will need to be located and designed in a way that reflects their status as landscapes of the highest quality. Where applications for major development come forward, paragraph 172 of the Framework sets out a number of particular considerations that should apply when deciding whether permission should be granted.”*

Paragraph 42 specifically addresses how development in the setting of protected landscapes should be approached. It states:

*“Land within the setting of these areas often makes an important contribution to maintaining their natural beauty, and where poorly located or designed development can do significant harm. This is especially the case where long views from or to the designated landscape are identified as important, or where the landscape character of land within and adjoining the designated area is complementary. Development within the settings of these areas will therefore need sensitive handling that takes these potential impacts into account.”*

## 2.3.3. The Colchester Declaration<sup>8</sup>

Set against concern for the future of the natural world, and intergovernmental reports that the current global response to the effects of human impact on nature is insufficient – the National Association for Areas of Outstanding Natural Beauty (NAAONB) believes that now is the time to significantly increase the scale and pace of nature conservation activity in AONBs.

In response, in 2019, the NAAONB demonstrated its readiness to act to redress declines in species and habitats within the context of a wider response to climate change in what is called the ‘Colchester Declaration’, which includes the following pledge:

*“By July 2020*

- 1. To enable an approach that creates opportunities within AONBs for people to make an emotional connection with nature.*
- 2. To work towards the creation of Nature Recovery Plans for each AONB*

*By 2024*

- 1. To embed an ecosystems services approach into all AONB Management Plans.*
- 2. To ensure all AONB management plans include meaningful measures around climate change mitigation and adaptation, including clear, measurable targets to support Net Zero.*

*By 2030*

- 1. That at least 200,000 ha of SSSIs in AONBs will be in favourable condition.*
- 2. That at least 100,000 ha of wildlife-rich habitat outside of protected sites will have been created/ restored in AONBs to further support the natural movement of plants and animals.*
- 3. That at least 36,000 ha of new woodland will have been planted or allowed to regenerate in AONBs following the principle of the right tree in the right place.*
- 4. That, by each AONB immediately adopting a species on the threatened list and by preparing and delivering a Species Action Plan, at least thirty species relevant to AONBs will be taken off the list by 2030.”*

<sup>8</sup> [https://landscapesforlife.org.uk/application/files/7216/1117/5782/The\\_Colchester\\_Declaration.pdf](https://landscapesforlife.org.uk/application/files/7216/1117/5782/The_Colchester_Declaration.pdf) (accessed 16 May 2022)

## 3.0 The Kent Downs AONB

### 3.1. Overview<sup>9,10</sup>

#### 3.1.1. Designation History

Proposals for a national designation (at that time, a National Park) in Kent were first put forward in evidence to the National Park Committee in 1929.

Whilst no immediate action was taken (the Government was preoccupied with dealing with the effects of the Great Depression), the lack of Government action led to the setting-up of the Standing Committee on National Parks (SCNP) by the Council for the Preservation of Rural England (CPRE) and the Council for the Preservation of Rural Wales (CPRW), which advanced well-argued proposals on National Parks ('The Case for National Parks in Great Britain') to Government in 1938.

War then intervened, but Government and its Committee on Land Utilisation in Rural Areas (1942), chaired by Lord Justice Scott, were clearly influenced by SCNP's campaign, and requested John Dower to prepare an official report on National Parks in England and Wales. Dower's Report, published in 1945, included the 'North Downs' (in Surrey and Kent) in his Division C list 'Other Amenity Areas NOT suggested as National Parks'. Dower's 'Other Amenity Areas' were put forward as areas of landscape beauty which merited some form of national protection in the future. Many of these 'Other Amenity Areas' provided the basis for the 52 conservation areas of high landscape quality, scientific interest and recreational value, listed in the July 1947 Report of the National Parks Committee (NPC), set up by Government following from the Dower Report, and chaired by Sir Arthur Hobhouse.

By 1955 the NPC was able to announce its intent to start the designation of Areas of Outstanding Natural Beauty (AONBs) which would be largely based (though not entirely) on the list of conservation areas contained in the 1947 Hobhouse Report.

The Surrey part of the North Downs conservation area was amongst the first to be considered in the NPC's programme, in 1955, and given the rapid progress of its designation, as the wider Surrey Hills, with its eventual confirmation by the Minister in 1958, it was inevitable that the adjoining Kent section of the North Downs would also gain early attention. At their meeting, in December 1957, the NPC were told by their Secretary, Harold Abrahams, that work would start on the designation of the AONB in Kent.

After several reviews and consultations, an area of 326 square miles (844 square kilometres) was formally designated as the Kent Downs AONB in July 1968.

In the early 1990's the areas of the Countryside Commission's designations were re-measured using modern techniques, and the total area of the Kent Downs AONB is now recorded as 339 square miles (878 square kilometres).

<sup>9</sup> Ray Woolmore (May 2002) Designation History Series Kent Downs AONB

<sup>10</sup> Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026  
<https://moderngov.dover.gov.uk/documents/s41032/AONB%20Report%20-%20Appendix%201.pdf> (accessed 12 May 2022)

The boundary of the Kent Downs AONB was drawn over 50 years ago, and over time a variety of requests to extend the boundary have been submitted. In June 2021<sup>11</sup> the Government announced proposals for new protected areas across England. Under the proposals, four areas will be considered for greater protections, with potential to deliver over 40% of the additional 4,000km<sup>2</sup> required to meet the Government commitment to protect 30% of land by 2030 for nature<sup>12</sup> and to safeguard more of England's beautiful and iconic landscapes for future generations, as outlined in its '10 Point Plan for a Green Industrial Revolution'<sup>13</sup>.

The four areas being considered for designation are the Yorkshire Wolds AONB, Cheshire Sandstone Ridge AONB and extensions to both the Chilterns and the Surrey Hills AONBs. The Kent Downs AONB is not currently being considered for a boundary review. At the time of writing (May 2022), Natural England is conducting its review of the boundary of the neighbouring Surrey Hills AONB.

### 3.1.2. Location and Landscape

The majority of the AONB lies within the county of Kent and covers around 23% of the total land area of the county. A further small area of the designation lies within the London Borough of Bromley. Administratively it is one of the most complex AONBs in England and Wales falling within twelve local authorities and lying partly or wholly within 137 parish council boundaries.

The Kent Downs AONB roughly follows an outcrop of chalk and greensand, the two ridges running parallel with each other to the coast.

The chalk ridge, with its characteristic dip slope and dry valleys, forms the eastern half of the North Downs ridge of chalk stretching from Farnham in Surrey to the English Channel. The western half of the chalk ridge lies within the Surrey Hills AONB, which adjoins the Kent Downs. The same ridge of chalk reappears on the French side of the Channel, where it lies within the Parc Naturel Régional des Caps et Marais d'Opale.

The chalk ridge has great wildlife importance in its unimproved grassland, scrub communities and broadleaved woodlands.

The well-wooded greensand ridge is particularly prominent in the Sevenoaks and Tonbridge and Malling districts and supports heathlands and acidic woodlands.

Other distinctive landscape elements include the fast-disappearing traditional Kentish orchards and hop gardens and the rich wooded foreground of the upland ridges, together with many historic parklands including Knole and Winston Churchill's Chartwell. The AONB's ancient settlements include picturesque half-timbered Charing and Chilham on the old Pilgrims Way to Canterbury. Since prehistory, this part of the country has been the invasion gateway to England and the North Downs are noted for their archaeological remains and military legacy.

The high-grade agricultural land means that farming is widespread with some areas characterised by intense agricultural and horticultural uses. The AONB, bordered by large

<sup>11</sup> <https://www.gov.uk/government/news/natural-england-announces-landmark-new-programme-for-protected-landscapes> (accessed 26 January 2022)

<sup>12</sup> <https://www.gov.uk/government/news/pm-commits-to-protect-30-of-uk-land-in-boost-for-biodiversity> (accessed 26 January 2022)

<sup>13</sup> HM Government, The Ten Point Plan for a Green Industrial Revolution (November 2020)

and expanding urban areas including Ashford, Maidstone and the Medway towns, as well as the ports of Dover and Folkestone, has a large commuter population and the North Downs are a heavily used local recreational resource. The area also receives visitor traffic from London and the Kent resorts, and the AONB forms an integral part of tourist promotion of the 'Garden of England'.

## 3.2. Planning Overview

### 3.2.1. Introduction<sup>14</sup>

As noted in the AONB Management Plan, within an area as large and varied as the Kent Downs, there are many hundreds of individuals and organisations which have a role in managing the landscape and supporting local business and communities.

Together the Kent Downs AONB Partnership plays a central and convening role in realising the strategic vision for the Kent Downs AONB and overseeing the Management Plan.

The Joint Advisory Committee (JAC) for the Kent Downs AONB was established in July 1997 and is at the heart of the partnership. An Executive of JAC representatives and some outside advisors has assisted in steering the work of the Kent Downs AONB Unit. At a much larger scale, an occasional Kent Downs Forum is held for a wider audience, to discuss current issues and gain input and advice.

The AONB Unit is employed through and hosted by Kent County Council and works on behalf of Government and the JAC to carry out the preparation and review of the Management Plan, to advocate its vision, aims and principles and work in collaborative partnerships to deliver a range of actions described in the Action Plan.

Together the JAC, its Executive and the Unit form the Kent Downs AONB Partnership.

With specific reference to planning, the Kent Downs AONB Unit acts in an advisory role to the local planning authorities on decisions that may impact on the AONB. The Unit is not a local planning authority and the responsibility for preparing development plans and determining planning applications lies with the local authorities (Sevenoaks District in the case of the Site at Ashgrove Road).

Priority is given to providing advice on planning policy formulation (see Section 3.2.2) but the Unit also advises local planning authorities on planning applications, where these fall within the remit of an agreed Planning Protocol (see Section 3.2.3). In accordance with the Protocol, the Unit generally only comments on planning applications which would have a significant effect on the AONB or when advice is requested by a local planning authority.

The Unit also advises Parish Councils on the preparation of Neighbourhood Plans and produces publications which provide guidance on conserving and enhancing the landscape (see Section 3.2.4).

The Kent Downs AONB Management Plan (see Section 3.2.5) prepared by the Unit is a material consideration in planning decisions. The Management Plan sets out the special characteristics and qualities of the Kent Downs AONB and provides policies on the

<sup>14</sup> <https://kentdowns.org.uk/planning/planning-overview/> (accessed 16 May 2022)

management of the AONB. It is adopted by all the local authorities in the Kent Downs AONB.

### 3.2.2. Local Planning Policy

Adopted local planning policy is set out in the 'Core Strategy' (adopted 22 February 2011) and 'Allocations and Development Management Plan' (adopted February 2015). Policies of relevance are outlined below:

Policy LO8 – The Countryside and the Rural Economy requires that [inter alia]:

*"The extent of the Green Belt will be maintained.*

*The countryside will be conserved and the distinctive features that contribute to the special character of its landscape and its biodiversity will be protected and enhanced where possible. The distinctive character of the Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings, will be conserved and enhanced.*

*Particular regard will be given to the condition and sensitivity of the landscape character and securing the recommended landscape actions in the proposed SPD to ensure that all development conserves and enhances local landscape character and that appropriate mitigation is provided where damage to local character cannot be avoided..."*

Policy EN5 – Landscape requires that [inter alia]:

*"The Kent Downs and High Weald Areas of Outstanding Natural Beauty and their settings will be given the highest status of protection in relation to landscape and scenic beauty.*

*Proposals within the AONB will be permitted where the form, scale, materials and design would conserve and enhance the character of the landscape and have regard to the relevant Management Plan and associated guidance.*

*Proposals that affect the landscape throughout the District will be permitted where they would:*

- a) conserve the character of the landscape, including areas of tranquillity; and*
- b) where feasible help secure enhancements in accordance with landscape actions in accordance with the Sevenoaks Countryside Assessment SPD."*

### 3.2.3. Planning Protocol<sup>15</sup>

The Kent Downs Area of Outstanding Natural Beauty Partnership (which includes all the local authorities within the AONB) has agreed to have a limited land use planning role. In summary this is to:

- Comment on planning policy issues - for instance Local Plans.
- Involvement in development management (planning applications) only in exceptional circumstances, such as in terms of scale, precedence and cumulative effect.
- To provide advice and comments on development management (planning applications) at the request of a Kent Downs AONB Joint Advisory member and /or Local Authority Planning Officer. These comments can take the form of support with guidance on mitigation, or objection with reasons.

<sup>15</sup> [Planning protocol - Kent Downs](#) (accessed 12 May 2022)

- Provide guidance and training on the AONB Management Plan, and the supporting guidance and position statements, to LPAs, Parish Councils, Community groups, consultants, developers and landowners.

The AONB Unit only responds to planning consultations when requested in accordance with the agreed protocol and the comments of the AONB relate only to the impact of the application or the policy on the components of natural beauty as set out in the Management Plan, and not all planning issues.

### 3.2.4. Position Statements and Guidance

The Kent Downs AONB Unit produces publications which provide guidance on conserving and enhancing the landscape of the AONB<sup>16</sup>.

These comprise:

#### Guidance

- Kent Downs AONB Guidance on the selection and use of colour in development – Survey and Guidance
- Kent Downs AONB Farm Diversification Toolkit
- Kent Downs AONB Farmstead Guidance
- Landscape Design Handbook
- Managing Land for Horses – a guide to good practice in the Kent Downs AONB
- Kent Downs AONB Rural Streets and Lanes: a design handbook

#### Position Statements

- Renewable Energy Position Statement
- Setting Position Statement

### 3.2.5. Kent Downs AONB Management Plan 2021-2026<sup>17</sup>

As a statutory plan required by the Countryside and Rights of Way Act 2000, the Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026 (the Management Plan) sets out the shared vision of the future of the designated area. The Management Plan identifies the key issues, opportunities and threats facing the landscape and sets out aims and principles for the positive conservation and enhancement of the Kent Downs for a five-year period.

The goal of the Management Plan is to ensure that the natural beauty and special character of the landscape and vitality of the communities are recognised, valued, enhanced and strengthened into the future.

<sup>16</sup> <https://kentdowns.org.uk/planning/planning-publications/> (accessed 16 May 2022)

<sup>17</sup> Kent Downs Area of Outstanding Natural Beauty (AONB) Management Plan 2021-2026 (<https://explore-kent-bucket.s3.eu-west-1.amazonaws.com/uploads/sites/7/2021/11/16141210/The-Kent-Downs-AONB-Management-Plan-2021-2026-Adopted.pdf>) (accessed 12 May 2022)



Of particular importance to this appraisal, the management plan defines the special components, characteristics and qualities of the Kent Downs AONB, which are discussed further in **Section 4**.



## 4.0 Natural Beauty of the Kent Downs AONB

### 4.1. Principles of Natural Beauty

In its 'Guidance for assessing landscapes for designation as a National Park or AONB'<sup>18</sup> Natural England sets out the criteria it uses to ensure that appraisals are undertaken in a consistent and transparent way.

It states that natural beauty is not exhaustively defined in the legislation and its assessment ultimately involves a value judgment. It goes on to record that in England it is widely accepted that the beauty of landscapes is in part due to human intervention such as agriculture and forestry. It adds that it has long been the practice to include such factors in the assessment of natural beauty and that this is now clarified in statute, and in the case of both AONBs and National Parks land is not prevented from being treated as being of natural beauty by the fact that it is used for agriculture, or woodlands, or as a park, or that its physiographical features are partly the product of human intervention in the landscape (s.99 of Natural Environment and Rural Communities Act 2006 (NERC)).

It adds that it is Natural England's view that fauna and flora (i.e. wildlife), geological and physiographical features and cultural heritage can all contribute to the perception of natural beauty of all landscapes and that any assessment of natural beauty must take these factors into consideration, whether in relation to a National Park or an AONB designation. For example, the presence of particular wildlife or cultural heritage features can make an appreciable contribution to an area's sense of place and thereby heighten the perception of natural beauty. It adds that there is now express statutory clarification that wildlife and cultural heritage may be taken into account in assessing natural beauty for National Park designations (s.59(1)) of NERC).

It further adds that during the passage of the NERC Bill through Parliament, Lord Bach for the Government explained that the intention, and the current practice, is that wildlife and cultural heritage considerations are factored into the natural beauty assessments rather than being free-standing tests in their own right. Whilst this statement was made in connection with National Parks, past and present practice has been to treat the practical assessment of natural beauty in National Parks and AONBs in the same way.

Notwithstanding the differences in the express statutory provisions, the Government's formal position during the passage of the NERC Act was that the natural beauty required of a National Park and an AONB are the same. Natural England considers that there is no material difference between the requirements in practical terms of the natural beauty criterion in the two pieces of legislation. Accordingly, if an area meets the natural beauty criterion, Natural England will normally consider it to have natural beauty of a standard suitable for either National Park or AONB designation.

With reference to the practical application of this, Natural England states that the systematic evaluation of natural beauty can be a complex exercise requiring careful assessment and judgment. It adds that it has developed a list of factors that have been accepted as contributing to natural beauty and that provides a practical framework for an

<sup>18</sup> Natural England (Updated June 2021) Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England ([https://www.surreyhill.org/wp-content/uploads/2021/07/Guidance-on-Assessing-Landscapes-for-Designation-Updated-2021\\_final-30.6.21\\_2ndtestpdf.pdf](https://www.surreyhill.org/wp-content/uploads/2021/07/Guidance-on-Assessing-Landscapes-for-Designation-Updated-2021_final-30.6.21_2ndtestpdf.pdf)) (accessed 16 May 2022)

evidence-base which assists in making judgments about natural beauty in a rigorous and transparent way. The factors have been drawn from both past landscape character assessment guidance and precedent from previous designations.

The factors related to natural beauty listed (see **Table 1** below) are the main relevant factors. The guidance states that these are not intended to be exhaustive and other factors may be relevant in some circumstances. It adds that not all factors will be relevant in every case.

**Table 1: Factors related to Natural Beauty. (Taken from ‘Guidance for assessing landscapes for designation as National Park or Area of Outstanding Natural Beauty in England’ (updated June 2021))**

<b>Landscape Quality</b>
This is a measure of the current physical state or condition of the landscape and its features.
<b>Scenic Quality</b>
The extent to which the landscape appeals to the senses (primarily, but not only, the visual senses).
<b>Relative Wildness</b>
The degree to which relatively wild character can be perceived in the landscape and makes a particular contribution to sense of place.
<b>Relative Tranquillity</b>
The degree to which relative tranquillity can be perceived in the landscape.
<b>Natural Heritage Features</b>
The influence of natural heritage on the perception of the natural beauty of the area. Natural heritage includes flora, fauna, geological and physiographical features.
<b>Cultural Heritage Features</b>
The influence of cultural heritage on the perception of natural beauty of the area and the degree to which associations with particular traditions, people, artists, writers or events in history contribute to such perception.

In the guidance the factors listed are divided into sub-factors, which are judged by indicators. The indicators are statements of the features, characteristics and qualities which tend to indicate whether a particular factor is present.

Natural England notes that the sub-factors and associated indicators should be regarded as a ‘menu’ of examples (developed from past designations and subsequent consultation) from which those appropriate to the character of the landscape under consideration should be chosen, adapted or added to. It goes on to record that there is no ‘scoring’ involving accumulations of indicators and it is possible for a landscape to exhibit natural beauty even if a number of the indicators are not present.

Natural England’s guidance goes on to provide some general points on the application of the natural beauty criterion. Those specific to the consideration of an AONB are presented below:

- There is no need for an AONB to display a distinctive or coherent identity. A designation can contain different landscapes so long as the designation as a whole satisfies the natural beauty criterion.

- Not all factors or indicators have to be present across a designation. Different parts of a designation can satisfy the natural beauty criterion for different reasons, provided that overall, the area is of sufficient natural beauty to be designated as an AONB.
- The weight and relative importance given to different factors or indicators may vary depending on the geographic context.
- Natural beauty is assessed in terms of the current landscape, not some future potential for improvement. A rare exception may however apply where an existing initiative will deliver positive change of a standard which will meet the natural beauty criterion within the short term and for which there is a high degree of certainty that it will be achieved.

The Management Plan reflects many of the principles described in Natural England's guidance, and in particular that the term 'natural beauty' was always intended to embrace more than just the visual or scenic elements of the landscape and that Section 99 of NERC formally clarifies in law that land that is partly the product of human intervention does not prevent it from being treated, for legal purposes 'as being an area of natural beauty (or of outstanding natural beauty).'

The Management Plan also records the important link between people and place that is emphasised in the European Landscape Convention (Council of Europe) where landscape is defined as "...an area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors". The convention, ratified by the UK in 2006, also recognises that the landscape "...is an important part of the quality of life for people everywhere; in urban areas and in the countryside, in degraded areas as well as in areas of high quality, in areas recognised as being of outstanding beauty as well as everyday areas;".

It adds that "Social and economic activity that contributes to the landscape and natural beauty is fundamental to shaping the future of the AONB."

## 4.2. Natural Beauty Indicators of the Kent Downs AONB

Whilst not directly replicating the 'Factors Related to Natural Beauty' in the Natural England Guidance, the Kent Down AONB Management Plan describes the landscape components with special characteristics and qualities which together distinguish it as a landscape of national and international importance and underpin its significance and natural beauty.

These are described (in full) as follows:

### 4.2.1. Dramatic landform and views; a distinctive landscape character

The Kent Downs dramatic and diverse topography is based on the underlying geology. Key features comprise impressive south-facing steep slopes (scarps) of chalk and greensand; scalloped and hidden dry valleys, especially valued where they have a downland character; expansive plateaux; broad, steep-sided river valleys, and the dramatic, wild and iconic white cliffs and foreshore. Breath-taking, long-distance panoramas are offered, often across open countryside, estuaries and the sea from the scarp, cliffs and plateaux. The dip slope dry valleys and river valleys provide more intimate and enclosed vistas. The character of the Kent Downs is much valued; it arises from a distinctive, recognisable and pattern of elements in the landscape that make the Kent Downs particular and special as well as significant nationally and internationally.

## 4.2.2. Biodiversity-rich habitats

The unique landscapes of the Kent Downs create and contain a rich and distinctive biodiversity of local and often national or international importance. This landscape provides a home to several species that are largely or wholly confined to the Kent Downs in Britain. Habitats found in the Kent Downs include chalk grassland and chalk scrub; woodlands (ancient woodland, veteran trees and wood pasture), traditional orchards and cobnut platts, chalk cliffs and the foreshore, chalk streams and wet pasture, ponds and spring lines; heath and acid grassland. Hedgerows and trees outside woodlands are key features of the landscape and serve an important wildlife function along with networks of linear features of shaws, flower-rich field margins and road verges. The wildlife of the farmed landscape is special in the Kent Downs. Many key habitats are farmed and the Downs support some of the most important arable weed communities in Britain.

## 4.2.3. Farmed landscape

A long-established tradition of mixed farming has helped create and maintain the natural beauty of the Kent Downs. The pastoral scenery is a particularly valued part of the landscape. Farming covers around 64% of the AONB. Disconnected 'ribbons' of permanent grassland (shaves) are found along the steep scarp, valley sides, and on less productive land having been created by grazing. Locally concentrated areas of orchards, cobnut plats (nut orchards), hop gardens other horticultural production are also present, their regular striate form can enhance the rise and fall of the land, increasingly widespread vineyards add to this ordered character.

## 4.2.4. Woodland and trees

The Kent Downs is one of Britain's most wooded landscapes. Broadleaf and mixed woodland cover around 23% of the Kent Downs and frame the upper slopes of the scarp, dry valleys and plateaux tops. Almost 70% of the woodlands are ancient woodland meaning they have been continuously present at least since at least 1600; they support nationally important woodland plant and animal species. Large areas of sweet chestnut coppice are present throughout the Downs. Woodland is a much-valued component of the landscape, the sights, changing colours, smells and sounds adding to the perceptual qualities of the landscape. Individual, hedgerow, fine and ancient trees outside woodlands are a most important, characteristic and sometimes dramatic element of the landscape.

## 4.2.5. A rich legacy of heritage and culture

Millennia of human activity have created an outstanding cultural inheritance and strong 'time depth' to the Kent Downs. In the original designation the characteristic villages, churches and castles are particularly noted and the historic settlement pattern remains an important distinctive component of the AONB. There are the remains of Neolithic megalithic monuments, Bronze Age barrows, Iron Age hill-forts, Roman villas, roads and towns, medieval villages and hamlets focused on their churches, post-medieval stately homes with their parks and gardens and historic defence structures from Norman times to the twentieth century. Fields of varying shapes and sizes and ancient wood-banks and hedges, set within networks of droveways and sunken lanes have produced a rich historic mosaic, which is the rural landscape of today. Architectural distinctiveness is ever present in the scattered villages and farmsteads and oast houses, barns and other characteristic agricultural buildings, farmsteads, churches and historic country houses. The diverse range

of local materials used, which includes flint, chalk, ragstone, timber, brick and peg tile, contributes to the character, colour, tone and texture of the countryside. The AONB landscape has long been an inspiration to artists, scientists and leaders, from Shakespeare to Samuel Palmer, Darwin to Churchill and Turner to Moore; it was Toys Hill, in the Kent Downs, 'that inspired Octavia Hill to found the National Trust'. Today contemporary and more diverse publics are drawing their own inspiration from this extraordinary place. The inspiration that the landscape of the Kent Downs offers is not confined to the influential and famous, we know that a wide variety of people greatly value this place for many of the same reasons.

#### 4.2.6. The Heritage Coasts

The Heritage Coasts either side of Dover, include the shoreline, marine flora and fauna cliffs, heritage features and adjacent downland. The White Cliffs form part of our national identity and display internationally important geological exposures, they form a soaring land and seascape of vast horizons of sea and sky extending westwards to the subtle crumbling Greensand and Clay cliffs of Folkestone. The wildlife of the Heritage Coasts is internationally important, the clifftops consisting of nationally important chalk grassland and scrub, the cliff-faces supporting important breeding sea bird colonies including Fulmars, Rock Pipits, Lesser-black backed Gulls and the only Kent population of Kittiwakes. Seabirds wheeling high in the sky connect the sea and sky.

#### 4.2.7. Geology and natural resources

The imposing landform and special characteristics of the Kent Downs is underpinned by its geology. This is also the basis for the considerable natural capital and natural resources which benefit society. These include the soils which support an important farming sector and can sequester carbon; soil represent and is important biodiversity resource in its own right. The water and the water resources which support rivers teeming with wildlife and offering enchanting landscapes. Hidden below the chalk is a significant aquifer providing 75% of Kent's drinking water and feeding the much-valued chalk streams of the Downs. Fresh, clean air is experienced across the AONB and the vegetation patterns of the Downs are effective at removing air pollution.

#### 4.2.8. Tranquillity and remoteness

Much of the AONB provides surprisingly tranquil and remote countryside – offering dark night skies, space, beauty and peace. Simply seeing a natural landscape, hearing birdsong, seeing and hearing the sea, watching stars at night or 'bathing' in woodland are important perceptual qualities of the AONB.

### 4.3. Additional 'Natural Beauty Indicators' of the Kent Downs AONB

In a section titled 'What is special about the Kent Downs' the Kent Downs AONB website<sup>19</sup> refers to the majority of the 'natural beauty indicators' and 'other factors' described in the AONB Management Plan, with additional details provided in some cases.

<sup>19</sup> <https://kentdowns.org.uk/about-us/special-characteristics/> (accessed 19 May 2022)

An additional category of what can be reasonably considered as a 'natural beauty indicator' is provided. This is presented in full below.

## 4.3.1. Water and wetlands

Rivers, marshes and ponds are important components of the landscape of the Kent Downs and also provide valuable habitat for wildlife.

### Rivers

Rivers, streams, springs and ditches include a great variety of habitat and landscape types and are important features of the Kent Downs. The Kent Downs is crossed by three major rivers, the Darent, Medway and Stour which carve their way through the Kent Downs landscape.

The River Darent is a chalk stream that flows between Westerham and Dartford Marshes in West Kent. It has been used for thousands of years and has some significant sites dating back to the Romans who settled and farmed in the valley. Much of the riverside land is still farmed, although residential and commercial uses have become very important. The river itself has been manipulated, channelled and diverted many times; records show a mill settlement near Otford as early as 822.

The River Medway is a major tidal river and an important east-west divide in mid Kent. It is said to have been crossed by the invading Roman army in AD43 and Roman settlements include a villa at Eccles. It was also used to transport goods in the cement industry that established along the river in the 19th century until 2000.

The River Stour in east Kent changes in character as it flows through the Kent Downs from the south west. The course and flow of the Stour have been influenced over centuries by structures such as weirs, water mills, sewage works and diversion for the construction of the railway. Yet it still provides a valuable habitat for many flora and fauna as well as an important and cherished part of the Kent Downs landscape.

### Marshes

Marsh can be defined as land that is waterlogged for at least part of the year. Marsh land is not common in the Kent Downs AONB because of the free-draining nature of much of the underlying rock such as chalk. However, small areas of marsh can be found which are important for wildlife and contribute to the variety of the landscape.

Marshy areas can be found at the base of the Downs and depending on the soil type, are referred to marsh, fen or bog. A great deal of marshland has been lost, having been drained and ploughed for agriculture. This is particularly the case on Romney Marsh, a small area of which is included in the Kent Downs.

### Ponds

Ponds are generally uncommon in the AONB because of the underlying nature of the chalk with most found in the Low Weald. Approximately 75% of ponds in Britain have been lost in the last 100 years mainly because of drainage and land intensification. Yet ponds are vital for wildlife and an important feature in the landscape.



## 4.4. Other Components/Special Qualities of the Kent Downs AONB

While not described as characteristics and qualities of the landscape, the social and economic components of the Kent Downs AONB are also identified as being vital to the communities of Kent and key to its future conservation and enhancement.

The components that contribute to the 'Quality of life in the Kent Downs' are replicated in full below:

### 4.4.1. Vibrant communities

The Kent Downs is a living, working landscape shaped and managed by people. The most up to date population estimate as shows a total population of 96,000. While changing in nature, many of the Kent Downs communities are strong and vibrant, assertively seeking to conserve and enhance the place that they live in. Surrounding the AONB are large, rapidly growing and increasingly diverse urban communities, the Kent Downs offer a greatly valued landscape of peace, beauty and space to breath.

### 4.4.2. Access, enjoyment and understanding

The Kent Downs is an easily accessible and charming landscape well provided with access opportunities; well over 1 million people live within a kilometre of the AONB boundary. There is considerable demand for access and recreation in the Kent Downs and providing this in a way which supports the special characteristics and qualities of the AONB is an increasingly important but challenging task; many Site managers are reporting 'over-visiting' with sites being at and beyond their capacity on many occasions. The AONB provides a public rights of way network four times as dense as the national average and there is a high relative density of bridleways and byways. Active user groups help to promote the sustainable management and use of the AONB for quiet countryside recreation. Access to the Kent Downs AONB particularly through walking, cycling and riding provide demonstrable benefits to health and well-being at the same time visiting can support the local economy and services. Improving the understanding and enjoyment of the AONB is an important task, without this the landscape may not be fully recognised, valued or enjoyed and its future conservation and enhancement may not be assured.

## 5.0 Appraisal of the Effects

### 5.1. Introduction

The statutory purpose of the AONB designation is to conserve and enhance the natural beauty of the area.

It follows that the assessment of effects of new residential development at Ashgrove Road on the Kent Downs AONB should therefore consider the potential for effects on the characteristics, elements and features that contribute to its natural beauty.

Therefore this section of the appraisal identifies and describes:

- How the Ashgrove Road Site and its immediate setting contributes to the defined natural beauty and special qualities of the Kent Downs AONB; and
- How residential development of the type and scale proposed at Ashgrove Road has the potential to adversely affect the natural beauty and special qualities of the Kent Downs AONB and what measures to can be included in the design of new development to conserve and enhance the natural beauty and special qualities of the Kent Downs AONB.

As noted previously, a detailed assessment of the potential effects on the Kent Downs AONB would be undertaken and the findings included in the LVIA of the proposed development. The LVIA would also include details of all relevant measures to avoid or mitigate effects on landscape and visual receptors, including the Kent Downs AONB. Furthermore, the Design and Access Statement would include other details of the iterative design process and how the scheme has considered all relevant guidance, including the Kent Downs AONB Management Plan and other material published by the Kent Downs AONB Unit in developing the proposals.

### 5.2. Contribution to Natural Beauty and Special Qualities

With reference to the natural beauty indicators and special qualities of the Kent Downs AONB in Section 4 of this appraisal, Table 2 presents a high-level appraisal of the contribution the Site makes to each specific indicator and where relevant, where it detracts.

**Table 2: Analysis of how the Site contributes to the natural beauty and special qualities of the Kent Downs AONB**

Natural Beauty Indicator	Contribution made by the Site to natural beauty
Dramatic landform and views; a distinctive landscape character	<ul style="list-style-type: none"> <li>• The Site is relatively flat and does not contain dramatic landform features such as steep scarp slopes, dry valleys, expansive plateaux, steep sided river valleys or coastal cliffs.</li> <li>• Views from the Site are relatively contained by adjacent development and vegetation, resulting in the northern portion of the Site not offering any long-distance panoramas or forming part of a panorama visible from elsewhere.</li> </ul>



	<ul style="list-style-type: none"> <li>From elevated locations towards the south of the Site, views west are towards the distant wooded ridgeline in the vicinity of Knole Park.</li> </ul>
Biodiversity-rich habitats	<ul style="list-style-type: none"> <li>The Site does not contain any biodiversity designations or distinctive/valued habitats such as species rich chalk grassland, chalk scrub, heath, acid grassland, ancient woodland, veteran trees, traditional orchards, wet pasture, heath and acid grassland.</li> <li>A small area of broadleaved trees is located in the south-eastern corner of the Site. Open areas support a mixture of native and non-native understorey species including bluebell. A small amount of deadwood was recorded in the form of a dead stump.</li> <li>The key habitat feature on Site are the hedgerows (Habitat of Principal Importance) along the Site boundaries Hedgerows and trees outside woodlands are noted in the AONB Management Plan as serving an important wildlife function.</li> <li>A field pond surrounded by trees and scrubby vegetation is located within the Site, albeit its ecological interest is limited due to its small size, poor condition and transitional status<sup>20</sup>.</li> </ul>
Farmed landscape	<ul style="list-style-type: none"> <li>The Site is currently characterised by open pasture (comprising semi-improved neutral grassland) that is characteristic of the wider landscape south and west of Sevenoaks.</li> <li>The grazed sward within the Site is tussocky and shows signs of improvement, but also some diversity in grasses and forbs.</li> </ul>
Woodland and trees	<ul style="list-style-type: none"> <li>A small area of broadleaved trees is located in the south-eastern corner of the Site. Open areas support a mixture of native and non-native understorey species including bluebell. A small amount of deadwood was recorded in the form of a dead stump.</li> <li>The Site is defined by and contains established hedgerows/scrub with hedgerow trees and tree groups, including along boundary roads (sunken in some places). Hedgerows and trees outside woodlands are noted in the AONB Management Plan as serving an important wildlife function.</li> </ul>

<sup>20</sup> Urban Edge Environmental Consulting (April 2022) Technical Note (Ashgrove Road, Sevenoaks)

<p>A rich legacy of historic and cultural heritage</p>	<ul style="list-style-type: none"> <li>• The Site contains no designated heritage features, buildings or sites.</li> <li>• The nearest designated heritage asset to the Site is Cross Keys Cottage (listed at Grade II), which is separated from the Site by boundary planting, distance, and intervening 20th-century development. The application Site does not contribute to its significance.</li> <li>• There are a number of non-designated heritage assets in the vicinity of the Site. The only two with any meaningful relationship with the Site are Old Cross Keys and Fig Tree House, buildings that appear on Sevenoaks District Council's local list. Established planting on the south-eastern spur of the Site forms a prominent and attractive feature of the rural setting of Old Cross Keys.</li> <li>• There is some limited intervisibility between the Site and Fig Tree House but only from attic dormers and across the intervening paddock. The Site makes only a negligible contribution to the significance of Fig Tree House.</li> <li>• The pattern of routes, hedges and trees at the Site and to the south and west appears to have remained largely intact over the past century, albeit there have been localised modifications and the growth of Sevenoaks has occurred in phases from the early to mid-twentieth century to the east and north.</li> <li>• The eastern and western boundaries of the Site were in place by the mid-17th century (and potentially much earlier), with the triangular form of the area between Ashgrove Road and Oak Lane visible on Drury's 1769 map of Kent. Hedgerows on the eastern and western boundaries therefore relate to a field system in place before 1845 and are 'important'.</li> <li>• The southern Site boundary is not shown on Drury's map but was in place by 1839 (tithe map). The remaining hedgerows on this boundary relate to a field system in place before 1845 and are therefore 'important'.</li> <li>• Ashgrove Road can be characterised as a sunken lane with ancient wood banks and hedges. Sunken lanes or holloways are typically formed through the passage of humans, vehicles, and animals on rising ground over a long period of time.</li> </ul>
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The Heritage Coasts	<ul style="list-style-type: none"> <li>The Site is not within or in the setting of the Heritage Coast.</li> </ul>
Geology and natural resources	<ul style="list-style-type: none"> <li>The Site is currently characterised by open pasture.</li> <li>Soils and vegetation are a store of sequestered carbon.</li> <li>The Site contains no streams or other water courses. A small pond is present in the north east of the Site.</li> <li>Rainfall will filter through the underlying geology to feed local streams/rivers.</li> <li>Established trees and hedgerows bordering the Site can contribute to the reduction in air pollution locally.</li> </ul>
Tranquillity and remoteness	<ul style="list-style-type: none"> <li>The sites location on the edge of Sevenoaks reduces its sense of remoteness, relative tranquillity and dark sky views. Ashgrove Road and Oak Lane are unlit dark lanes.</li> <li>The adjacent trees and hedgerows generate birdsong that is audible in areas immediately neighbouring the Site.</li> </ul>
Water and wetlands	<ul style="list-style-type: none"> <li>The Site contains no streams or other water courses.</li> <li>A small pond is present in the north east of the Site.</li> </ul>
<b>Special Quality Indicator</b>	<b>Contribution made by Site to special qualities</b>
Vibrant communities	<ul style="list-style-type: none"> <li>The Site is managed for agricultural use and lies immediately adjacent to the urban fringe of Sevenoaks.</li> </ul>
Access, enjoyment and understanding	<ul style="list-style-type: none"> <li>The Site is not accessible to the public.</li> </ul>

### 5.3. Effects on Natural Beauty and Special Qualities

**Table 3** below presents a high-level analysis of the potential for new development to adversely effect the natural beauty of the natural beauty and special qualities of the Kent Downs AONB. Only those natural beauty or special quality indicators from **Table 2** are taken forward for analysis, as those not relevant to the Site have very little potential to be adversely affected.

Where there is the potential for an adverse effect to occur, measures are identified to avoid or mitigate these.

**Table 3: Potential for new development to adversely affect the natural beauty and special qualities of the Kent Downs AONB and measures to avoid or mitigate these effects**

Natural Beauty		
Natural Beauty Indicator	Potential for new development to adversely effect natural beauty indicators	Potential measures to avoid or mitigate adverse effects on natural beauty indicators
Dramatic landform and views; a distinctive landscape character	<ul style="list-style-type: none"> <li>• New development / access arrangements (for cyclists, pedestrians and motor vehicles) may require localised changes to levels / landform and removal of existing vegetation to accommodate access, passing places and visibility splays. This has the potential to impact on the character of Ashgrove Road as a sunken lane.</li> <li>• Vegetation removed from the boundary of the Site has the potential to open views to and from the Site from the neighbouring suburban and rural landscapes.</li> <li>• Development in the southern portion of the Site has the potential to remove the possibility of long-distance views to the wooded ridgeline in the vicinity of Knole Park.</li> <li>•</li> </ul>	<ul style="list-style-type: none"> <li>• Development that requires significant changes to topography (cut and fill) should be avoided.</li> <li>• Any localised changes in landform and levels should be characteristic of the local topography which is defined by gentle gradients and occasional steep sided rural lanes in cuttings bordered by established hedgerows and trees. The impact on the rural sunken lanes can be minimised by setting the Site entrance at points where the banking is lower, maintaining planted boundaries behind the visibility splays and simplifying the form of the entrance as much as possible.</li> <li>• Any other changes to the highway along Ashgrove Road should be minimised as far as possible, ensuring the character of the sunken lane is retained.</li> <li>• The visually enclosed character of the Site should be retained. However, long distance views towards the wooded ridgeline in the vicinity of Knole Park should be retained from an area of accessible open space.</li> <li>• There is an opportunity to incorporate elements of the local vernacular into the architectural design of new buildings that reflect the character of buildings in this area of the Kent Downs AONB and mark a transition from the suburban development of Sevenoaks and rural areas within the AONB.</li> </ul>

<p>Biodiversity-rich habitats</p>	<ul style="list-style-type: none"> <li>• New development within the Site, and measures to provide access to it, may require the removal of established vegetation and habitat features within and defining the Site – notably the pond, trees, hedgerows and shrubby vegetation.</li> </ul>	<ul style="list-style-type: none"> <li>• The pond should be retained and enhanced as a habitat feature as part of a green infrastructure network within the Site. Enhancements could include thinning out the surrounding vegetation, de-silting and re-profiling.</li> <li>• Hedgerows should be retained and protected during construction to maintain their ecological functions.</li> <li>• New sections of species-rich native hedgerow should be created along the southern boundary.</li> <li>• The retention and enhancement of native scrub along the northern boundary would create a stepped mosaic of habitat. These features would provide connectivity through the Site and with woodland habitats in the wider area, creating commuting routes and cover for a range of protected species / species groups.</li> <li>• During the construction phase, hoardings / tree protection fencing would be installed at the construction zone perimeter to protect the retained hedgerows.</li> <li>• The removal of boundary vegetation should be kept to a minimum.</li> <li>• Opportunities to create new habitats, such as species rich grassland and scrub / tree planting should be incorporated into the design of the proposals, with particular attention to connecting habitats and providing access to nature and natural systems for local residents as part of a green infrastructure strategy for the Site.</li> <li>• Existing and new habitats should be managed to enhance their biodiversity value in the long term.</li> <li>• Tree and shrub planting should be designed to provide nesting sites for birds and food resources for a range of</li> </ul>
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		<p>species. Plant stock will be sourced from a local supplier and ensure it is of local provenance.</p> <ul style="list-style-type: none"> <li>• Habitat piles could be created within areas of retained or created vegetation at the edges of the Site close to the trees and hedgerows. These will provide additional hibernation and shelter resources for wildlife.</li> <li>• Bat and bird boxes could be installed across the buildings and existing semi-mature / mature trees within the hedgerows.</li> </ul>
Farmed landscape	<ul style="list-style-type: none"> <li>• New development would necessitate the removal of an area of land currently under agricultural use.</li> </ul>	<ul style="list-style-type: none"> <li>• There is an opportunity for the Site to offer an opportunity for food production by local residents, within areas of public space and / or private gardens.</li> </ul>

Woodland and trees	<ul style="list-style-type: none"> <li>• The Site does not contain any woodland, however, new development within the Site, and measures to provide access to it, may require the removal of trees.</li> </ul>	<ul style="list-style-type: none"> <li>• Boundary vegetation should be retained and enhanced through ongoing management. Gappy hedgerows should be enhanced through new native shrub and tree planting, characteristic of the area.</li> <li>• The removal of boundary vegetation should be kept to a minimum.</li> <li>• Opportunities to create new habitats, such as species rich grassland and scrub / tree planting should be incorporated into the design of the proposals, with particular attention to connecting habitats and providing access to nature and natural systems for local residents as part of a green infrastructure strategy for the Site.</li> <li>• Existing and new habitats should be managed to enhance their biodiversity value in the long term.</li> <li>• New trees and vegetation should be sourced from local suppliers / be of local provenance</li> </ul>
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A rich legacy of historic and cultural heritage	<ul style="list-style-type: none"> <li>• Development on the Site is unlikely to have a meaningful impact on the contribution that their settings make to the significance of nearby designated and non-designated heritage assets (assuming the strong planted boundary on the south-eastern spur of the Site is maintained).</li> <li>• New development has the potential to affect the character of Ashgrove Road as a sunken lane</li> </ul>	<ul style="list-style-type: none"> <li>• Established boundary vegetation and notably on the south-eastern spur of the Site should be retained and managed.</li> <li>• The impact on the rural sunken lanes can be minimised by setting the Site entrance at points where the banking is lower, maintaining planted boundaries behind the visibility splays and simplifying the form of the entrance as much as possible.</li> <li>• Opportunities exist for a greater appreciation of the historic and cultural landscape through the use interpretation and 'local' street names.</li> </ul>
The Heritage Coasts	<ul style="list-style-type: none"> <li>• N/A</li> </ul>	<ul style="list-style-type: none"> <li>• N/A</li> </ul>
Geology and natural resources	<ul style="list-style-type: none"> <li>• Site clearance (including earthworks and vegetation removal) has the potential to affect the embedded carbon.</li> <li>• Significant areas of impermeable surfaces will limit groundwater infiltration.</li> <li>• The removal of trees and vegetation along the boundaries of the Site could increase air pollution locally.</li> </ul>	<ul style="list-style-type: none"> <li>• Reduce cut and fill and manage soils to reduce emissions of embedded carbon.</li> <li>• Retain existing established vegetation for its embedded carbon.</li> <li>• Establish areas of open space, SUDs and permeable paving to optimise ground water penetration.</li> <li>• Retain existing trees and vegetation bordering the Site and plant new street trees to contribute to the reduction in air pollution.</li> </ul>
Tranquillity and remoteness	<ul style="list-style-type: none"> <li>• Street lighting has the potential to reduce the rural dark lane character of Ashgrove Road and Oak Lane.</li> <li>• The loss of vegetation would impact on birds that are audible from within and adjacent to the Site.</li> </ul>	<ul style="list-style-type: none"> <li>• Seek to retain Ashgrove Road and Oak Lane as dark well vegetated routes, with no new lighting.</li> <li>• Minimise light spill from new development through careful design and specification of any external lighting.</li> <li>• Retain and enhance existing vegetation and create new habitats for birds.</li> </ul>



Water and wetlands	<ul style="list-style-type: none"> <li>New development has the potential to remove the existing pond within the Site.</li> </ul>	<ul style="list-style-type: none"> <li>Retain the existing pond as part of a green infrastructure strategy for the Site which includes SUDS and other features that have the potential to enhance the site's biodiversity and amenity value.</li> </ul>
<b>Special Qualities</b>		
<b>Special Quality Indicator</b>	<b>Potential for new development to adversely effect special quality indicators</b>	<b>Potential measures to avoid or mitigate adverse effects on special quality indicators</b>
Vibrant communities	<ul style="list-style-type: none"> <li>New development will remove an area of farmland immediately adjacent to the suburban edge of Sevenoaks, albeit it is not accessible to the public.</li> </ul>	<ul style="list-style-type: none"> <li>Create new, publicly accessible open space, with enhanced biodiversity and amenity interest and that provides a more effective edge to the town and gateway to the rural areas of the Kent Downs AONB.</li> </ul>
Access, enjoyment and understanding	<ul style="list-style-type: none"> <li>There is currently no access to the Site and as such there is limited potential for new development to adversely affect this special quality.</li> </ul>	<ul style="list-style-type: none"> <li>Create new, publicly accessible open space, with enhanced biodiversity and amenity interest and that provides a more effective edge to the town and gateway to the rural areas of the Kent Downs AONB.</li> <li>Incorporate way finding and interpretive signage into area of open space to enhance accessibility.</li> </ul>

## 6.0 Summary and Conclusions

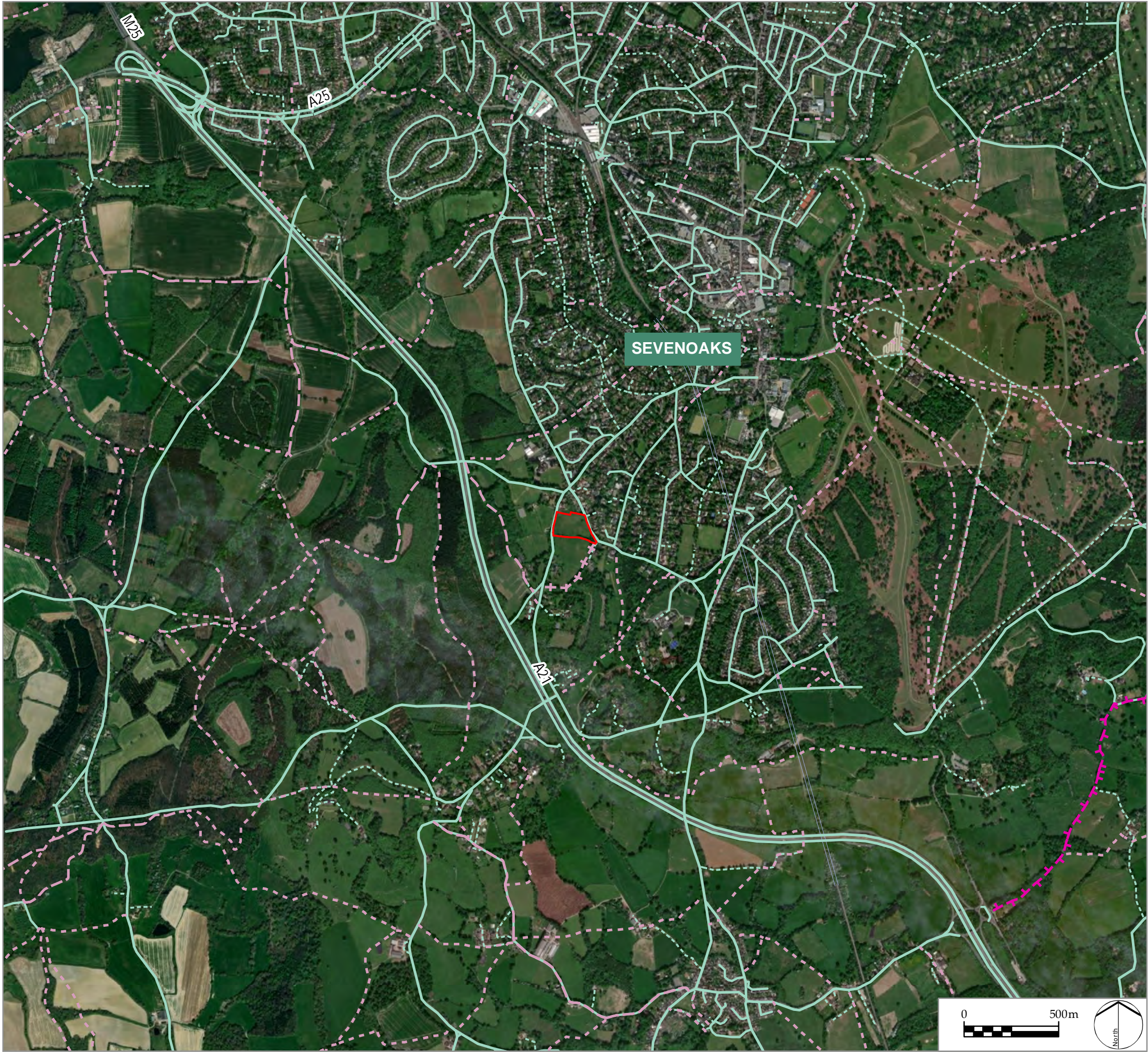
LDA Design was commissioned in March 2022 to provide landscape design and assessment services in relation to the proposed residential development on the land west of Ashgrove Road, Sevenoaks (the 'Site'), on behalf of Sigma Strategic Land Limited.

This AONB Appraisal establishes the legislative and policy context for the AONB; the natural beauty criteria and special qualities that are specific to the Kent Downs AONB; how the Site contributes or detracts from these characteristics; and the potential for adverse effects on the natural beauty of the AONB resulting from the Proposed Development. Finally, it identifies how such adverse effects could be avoided or mitigated and how new development at the Site could conserve and enhance the areas natural beauty.

Overall, it is concluded that there are a range of measures that can be deployed to avoid or mitigate adverse effects on natural beauty indicators and special qualities. This includes minimising changes to the fabric of the Site itself, by avoiding significant cut / fill and retaining / enhancing existing features, such as boundary vegetation and the pond; incorporating elements of the local vernacular into the architectural design of new buildings; and creating new opportunities to access and interpret the Site.



Z:\8504\_ASHGROVE\_ROAD\8GIS\PROJECTS\8504\_AONB\_009\_SITE\_LOCATION.MXD



- LEGEND
- Site boundary
- Local Context
- Primary road
  - Minor
  - Local
  - Restricted
  - Railway Tunnel
  - Footpath
  - Bridleway
  - Byway
  - Restricted Byway

LDĀDESIGN

PROJECT TITLE  
LAND WEST OF ASHGROVE ROAD, SEVENOAKS

DRAWING TITLE  
Figure 1:  
Site Location

ISSUED BY	Oxford	T: 01733 310 471
DATE	26 Jul 2022	DRAWN KP
SCALE @A3	1:20,000	CHECKED NA
STATUS	Final	APPROVED PL

DWG. NO. 8504\_AONB\_009

No dimensions are to be scaled from this drawing.  
All dimensions are to be checked on site.  
Area measurements for indicative purposes only.

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Sources: Ordnance Survey, DCLG, Natural England, Sustrans, Forestry Commission



Z:\8504\_ASHGROVE\_ROAD\GIS\PROJECTS\8504\_AONB\_010\_SITE\_IMMEDIATE\_CONTEXT.MXD



- LEGEND
- Site boundary
  - Local Context
    - Primary road
    - Minor
    - Local
    - Restricted
    - Railway Tunnel
    - Footpath
    - Bridleway
    - Byway

LD&A DESIGN

PROJECT TITLE  
LAND WEST OF ASHGROVE ROAD, SEVENOAKS

DRAWING TITLE  
Figure 2:  
Immediate Site Context

ISSUED BY	Oxford	T: 01733 310 471
DATE	26 Jul 2022	DRAWN KP
SCALE @A3	1:5,000	CHECKED NA
STATUS	Final	APPROVED PL

DWG. NO. 8504\_AONB\_010

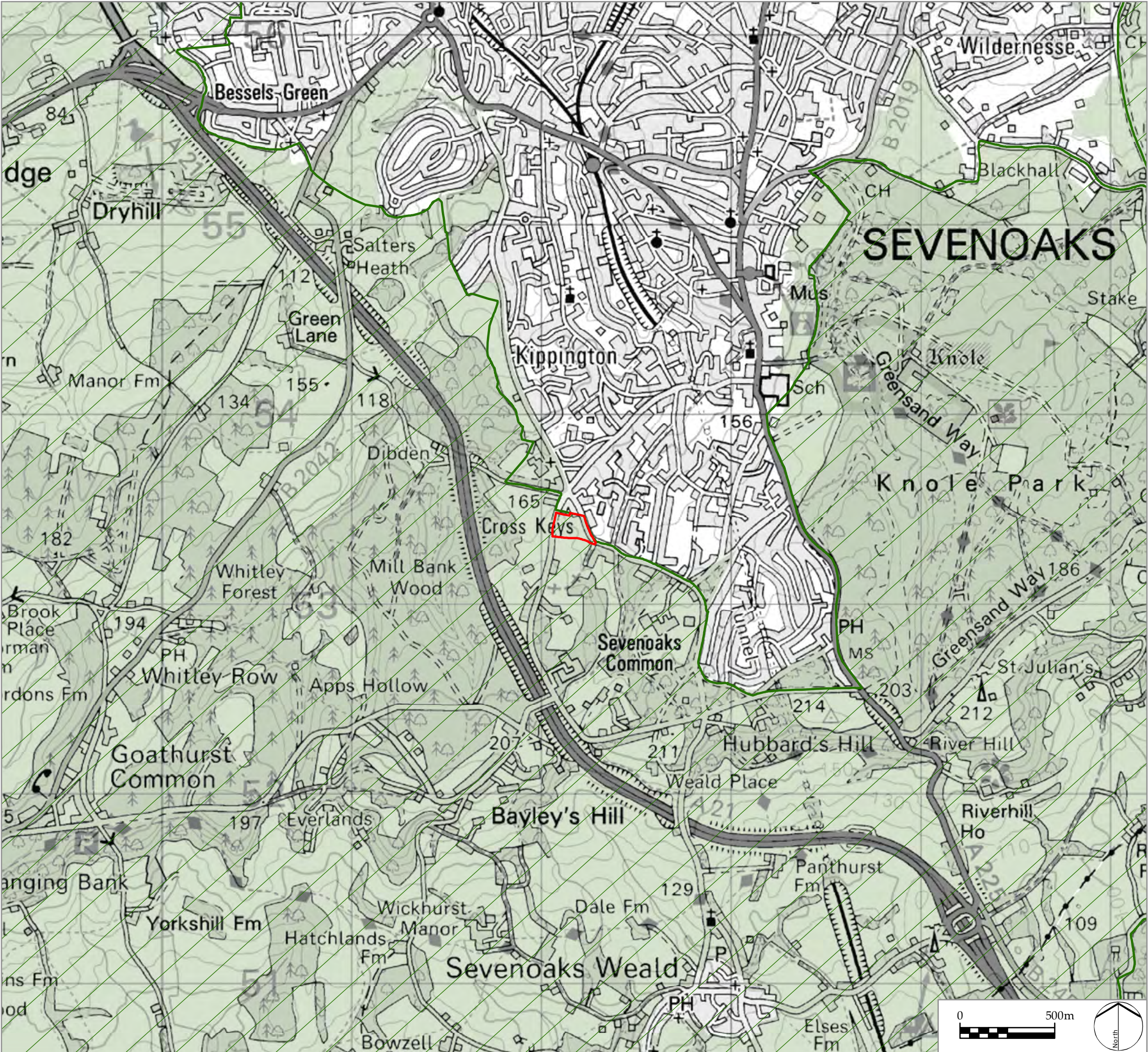
No dimensions are to be scaled from this drawing.  
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LEGEND

Site boundary

Designated Landscapes

Area of Outstanding Natural Beauty

Green Belt

# LDA DESIGN

PROJECT TITLE  
LAND WEST OF ASHGROVE ROAD, SEVENOAKS

DRAWING TITLE  
Figure 3:  
Landscape Designations

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DATE	26 Jul 2022	DRAWN KP
SCALE @A3	1:20,000	CHECKED NA
STATUS	Final	APPROVED PL

DWG. NO. 8504\_AONB\_011

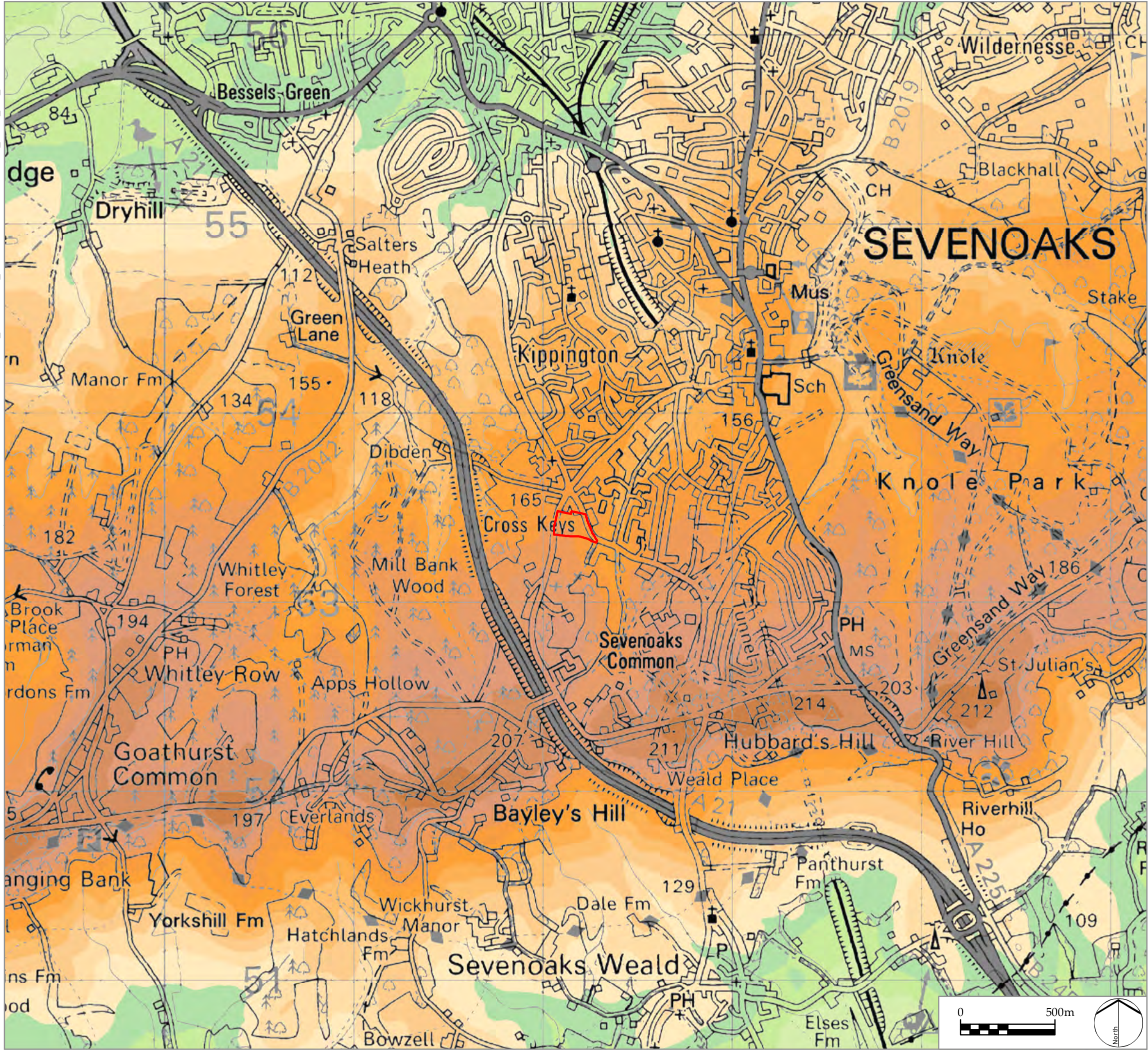
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Sources: Ordnance Survey, DCLG, Natural England, Sustrans, Forestry Commission



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LEGEND

Site boundary

Elevation (m AOD)

210 - 220	130 - 140
200 - 210	120 - 130
190 - 200	110 - 120
180 - 190	100 - 110
170 - 180	90 - 100
160 - 170	80 - 90
150 - 160	70 - 80
140 - 150	60 - 70

# LDĀDESIGN

PROJECT TITLE  
LAND WEST OF ASHGROVE ROAD, SEVENOAKS

DRAWING TITLE  
Figure 4:  
Landform

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DATE	26 Jul 2022	DRAWN KP
SCALE @A3	1:20,000	CHECKED NA
STATUS	Final	APPROVED PL

DWG. NO. 8504\_AONB\_012

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Sources: Ordnance Survey, NextMap25