

# MAIDSTONE BOROUGH LOCAL PLAN EXAMINATION

## SESSION 4 – ENVIRONMENTAL CONSTRAINTS

**This statement is made by John Britt (R193) of Lenham and supported by Lenham Neighbourhood Plan Group**

### **2. Policies for Landscapes of Local Value and for the setting and separation of individual settlements**

*Issue (ii) Whether policies for Landscapes of Local Value and for the separation of settlements are justified and will be effective*

**Qn4.7 Is the policy consistent with national policy for the AONB and should there be a reference to national policy for major development in the policy or supporting text?**

Answer: The policy is not in line with national policy for the AONB.

Evidence: By inclusion into the policy on ‘Countryside’ which defines countryside as ‘*all those parts of the plan outside the settlement boundaries*’, the villages and settlements within the AONB would not be protected. National policy on the AONB and its setting however **includes** villages and settlements.

In my opinion an out of scale building or out of character building within the boundary of a village in the AONB and its setting would have a detrimental impact on intrinsic character of the AONB or on views from the AONB.

**Qn4.8 Does Policy SP17(5) seek to provide exactly the same policy to the setting of the AONB as to the designated AONB itself and is that justified?**

Answer Policy SP17 (5) does not seek to provide exactly the same policy to the setting of the AONB as to the designated AONB itself.

Evidence: Policy 5.81 states ‘*However, proposals which would affect the setting of the AONB are not subject to the same level of constraint as those which would affect the AONB itself.*’

This is not in line with the Kent Downs Management Plan ‘*where the qualities of the AONB which were instrumental in reasons for its designation are affected, then the impacts should be given considerable weight in decisions.*’ (Local Plan policy 5.81).

Some of the qualities which were instrumental in the designations of the AONB were mentioned earlier and are detailed in National Character Profile of the North Downs AONB by Natural England and the Management Plan of the AONB Unit

- aquifers and associated line of springs
- associated streams, wetland habitats adjacent to watercourses to regulate flow patterns
- habitat (also potential habitat) if farming were to change or cease
- recreation and tourism associated with or generated by proximity to the AONB, North Downs Way
- sense of place: views from and to the AONB, Bedrock geology as exposed in Lenham Quarry SSI
- sense of History heritage Assets such as Lenham Cross

Some of the qualities of the AONB, which were reasons for its designation, would be affected by development along the immediate foreground of the AONB.

The conclusion that it is not necessary to formerly define the setting of the AONB is not in line with other landscape strategies in this Local Plan which clearly define ‘Landscapes of Local Value’ (policy 5.83) or ‘The Countryside’ (SP17) and weakens, in our opinion, the protection mechanism for this valuable landscape of national importance.

#### **Qn4.9 How would the setting of the AONB be defined?**

I suggest the following definition: The setting of the North Downs AONB is the area between the official boundaries of the AONB and the line where the service function of the AONB ends.

Evidence: The definition reflects DEFRA’s white paper: ‘The Natural Choice: securing the value of nature’

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/228842/8082.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/228842/8082.pdf)

This would then also be in line with Government Guidance on ‘Landscape as an Ecosystem Service’:

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/218695/env-impact-landscape.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/218695/env-impact-landscape.pdf)

The guidance focuses on landscape as a service.

Landscape services and benefits in this respect can be divided into two categories:

1. landscape as a resource in its own right, dealing with changes in the fabric, character, qualities and quality of the landscape and requiring expert knowledge of factors such as, for example, landscape character, typologies, distribution, rarity, condition and quality;
2. visual qualities and the effects these may have on aesthetic experience and visual amenity. ‘ ( see page 2)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/218695/env-impact-landscape.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/218695/env-impact-landscape.pdf)

The service function of the AONB which extends to the land beyond comprises:

- extent of aquifers (crucial for water supply)
- associated streamlines (habitat chalk stream, but also green infrastructure for delivery of water to wider area and sewage treatment plants)
- habitat (also potential habitat if farming were to change or cease)
- recreation and tourism associated with or generated by proximity to the AONB
- Views from and to the AONB

The area has been identified by Maidstone Borough Council as ‘Fringe of the AONB’ and by the AONB Unit as ‘Vale of Holmesdale’.

In MBC Landscape Capacity Study (2015) the area sensitivities of the various areas comprising or aligned to the AONB are listed in the table below with their relative landscape character and visual sensitivities:

<b>Area</b>	<b>Landscape character sensitivity / visual sensitivity</b>	<b>Sensitivity to change</b>
<b>East Lenham Vale</b>	<b>High / High</b>	<b>SENSITIVE TO CHANGE</b>
<b>Harrietsham to Lenham Vale</b>	<b>Moderate / High</b>	<b>SENSITIVE TO CHANGE</b>

<b>Eythorne Vale</b>	<b>High / High</b>	<b>SENSITIVE TO CHANGE</b>
<b>Thurnham Vale</b>	<b>High / Moderate</b>	<b>SENSITIVE TO CHANGE</b>
<b>Boxley Vale</b>	<b>High / Moderate</b>	<b>SENSITIVE TO CHANGE</b>
<b>Sandling Vale</b>	<b>Low / Moderate</b>	<b>TOLERANT OF CHANGE</b>

Comment: under the current proposals\_Maidstone Borough Council's Draft Local Plan envisages major development in the areas with the highest landscape values:

1. Woodcut Farm in Eythorne Vale
2. Lenham Broad Location H2 (3) which extends into the East into East Lenham Vale.

Dated 13<sup>th</sup> September 2016