



OTTERPOOL PARK

COUNTRYSIDE • CONNECTED • CREATIVE

ENVIRONMENTAL STATEMENT
OP5 CHAPTER 12 – **LANDSCAPE AND
VISUAL IMPACT**

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March 2022



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Environmental Statement Volume 2: Main ES Chapter 12: Landscape and Visual Impact

MARCH 2022



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12 Landscape and Visual Impact

12.1 Introduction

- 12.1.1 This chapter of the ES assesses the impact of construction and operation of the proposed Development with respect to landscape and visual.
- 12.1.2 This chapter should be read in conjunction with Chapters 1-4 (the introductory chapters).
- 12.1.3 It has also been prepared alongside and informed by Appendix 12.1: Site Specific Landscape Character Assessment, Appendix 12.2: Landscape Character and Visual Amenity Impact Assessment Tables, Appendix 12.3: Figures, Appendix 12.4: Minutes of Meeting with F&HDC and AONB unit 31 July 2018 and ES Appendix 12.5: Kentish Vernacular Study and Colour Studies and Figures 12.1 to 12.77 in ES Appendix 12.3.
- 12.1.4 The Chapter provides:
- a description of the aspects of the proposed Development that are of particular relevance to landscape character and visual amenity,
 - a summary of relevant legislation, planning policy and guidance relevant to this topic,
 - a summary of the consultation carried out with key stakeholders during the course of the preparation of this landscape and visual impact assessment (LVIA),
 - a description of the methodology used to undertake the assessment,
 - a description of the baseline conditions i.e. the key landscape characteristics and visual context of the site and its surrounds;
 - a list of the baseline landscape character receptors upon which the effects of the proposed Development have been assessed;
 - details of embedded design and additional mitigation measures.
 - an assessment of the likely residual adverse or beneficial effects that would occur upon any receptor, and consideration of the significance of those effects.
 - A summary of the assessment.

Relationship with Other Parts of the Application

- 12.1.5 Other parts of the amended outline planning application (OPA) which are also relevant to the understanding of this Chapter, and their application document references, are listed below. Those documents submitted for approval are:
- Chapter 4: The Site and the Proposed Development – which contains a full description of the proposed Development;
 - the ‘Parameter Plans for approval’;
 - the Alternative ‘Parameter Plans for approval (regarding permitted waste facility in situ) (ES Appendix 2.8);
 - the ‘Development Specification’ (ES Appendix 4.1) (OP-DS); and
 - the ‘Strategic Design Principles’ (ES Appendix 4.3) (SDP).
- 12.1.6 Those documents submitted in support of the OPA are:
- Illustrative accommodation schedule (ES Appendix 4.4),
 - the Illustrative plans submitted in support (ES Appendix 4.5),

- the Indicative Phasing Plan (ES Appendix 4.6),
- the Green Infrastructure Strategy (ES Appendix 4.11) (GI-Strategy),
- the Heritage Strategy (ES Appendix 4.12),
- the Governance and Stewardship Report (ES Appendix 4.13),
- the Design & Access Statement (ES Appendix 4.16) (DAS),
- the ‘Contemporary Kentish Vernacular Study’ (ES Appendix 12.5) (CKVS).

Relevant Aspects of the Proposed Development

- 12.1.7 Chapter 4: The Site and the Proposed Development contains a full description of the proposed Development that outline planning permission is sought for at this stage of the tiered planning process.
- 12.1.8 Those general components of the proposed Development that have the potential to impact upon landscape character and visual amenity include the construction and operation of: 8,500 no. dwellings; the proposed commercial, retail, education, health, community and leisure facilities; utility, energy, lighting, drainage, green and blue infrastructure; and movement routes and connections, the demolition or conversion of identified existing buildings; the temporary development as may be necessary for the construction of the proposed Development; and the long term management of the green and blue infrastructure estate.

Planning Documents For Approval

- 12.1.9 The specific aspects of these components that are relevant to the LVIA is set out across the documents for approval and is summarised in the paragraphs below.

Development Specification

- 12.1.10 The OP-DS provides a more detailed description of the proposed Development, identifies the status of the documents that are submitted for approval in the OPA and those that are submitted for support, and an explanation of the tiered planning process – identifying the components that outline planning permission is sought for and which are reserved for approval in future detailed planning applications.
- 12.1.11 The OP-DS confirms that the planning application for Otterpool Park is submitted in outline to provide the necessary flexibility for the detailed design of the proposed Development to be approved through the preparation of phased-specific ‘design codes’ and masterplans, and the subsequent submission of reserved matters applications. At this outline permission stage all matters are reserved (apart from the parameters set out within the document and the other documents for approval) for future determination. These matters are layout, scale, appearance, landscaping and means of access.
- 12.1.12 Paragraph 5.2 of the OP-DS also confirms that the securing of effective mitigation measures necessary to address unavoidable adverse impacts that are predicted to arise from the proposed Development would be controlled through planning conditions to the OPA.
- 12.1.13 The OP-DS highlights that the “implementation of the proposed Development will be staged to ensure that the demolition and construction activities required are delivered in a timely, proper and orderly way, and to ensure that any disruption is minimised.”
- 12.1.14 It also identifies that during the construction phase of the proposed Development a number of interim works and meanwhile uses would be undertaken. These include, in addition to the construction works themselves, minor vehicular access arrangements, temporary construction roads, ground works, setting up of

construction compounds and other works pursuant to the delivery of the development.

- 12.1.15 The OP-DS also confirms that until land within the site is required for development it would remain in its current use or be used for temporary development that is akin to that being applied for in this application. For the majority of the land within the application boundary that means that land would remain in agricultural use until such time as it is required for development.

Parameter Plans

- 12.1.16 These spatial diagrams identify those elements of the proposed Development which are to be controlled as part of the planning permission, and they set boundaries within which details of future reserved matter applications must be prepared, submitted and approved in substantial accordance with (along with any conditions attached to the outline planning permission). Their relevance to the LVIA is set out in the paragraphs below.

OPM(P)4001_YY – Development Areas and Movement Corridors

- 12.1.17 This shows the location and maximum extents of the proposed Development area considered within the LVIA and used in the preparation of the Zone of Theoretical Visibility (ZTV). The LVIA has considered that within these may be located development as described: The planning application seeks permission for a new garden settlement accommodating up to 8,500 homes (Use Classes C2 and C3) and Use Class E, F, B2, C1, Sui Generis development, including use of retained buildings as identified, with related infrastructure, highway works, green and blue infrastructure, with access, appearance, landscaping, layout and scale matters to be reserved.
- 12.1.18 With relevance to the LVIA, the parameter plan also shows the approximate location of town centre and local centres (but not their extents); and the indicative locations for, and the allowable deviations of, key new: vehicular bridge crossing over existing watercourses; ‘all movement’ corridors (i.e. combined routes for all motorised vehicles, cyclists and pedestrians); new combined routes for buses, emergency vehicles and cyclists; bridleway routes (some of which follow the routes of existing public bridleways); and combined cycleways and footways (some of which follow the routes of existing public footpaths), and the connections of these to existing on and offsite routes (such as public highways and Public Rights of Way (PRoW)). Not all movement corridors are shown.
- 12.1.19 Where these key movement corridors can and cannot deviate from their indicative routes, due to the presence of existing environmental constraints, is also shown. The routes would not deviate where they align with existing PRoW or where the deviation would take the route outside of the application boundary.
- 12.1.20 Likewise, the indicative location of these routes to offsite connections is also shown on the parameter plan. Where these connections can and cannot deviate from their indicative locations, due to the presence of existing environmental constraints, is also shown. The routes would not deviate where they align with existing PRoW / highway junctions.
- 12.1.21 Parameter plan *OPM(P) 4001 – Development Areas and Movement Corridors* also indicates the part re-alignment and upgrading of the A20 between junction 11 of the M20 and Newingreen. A description of these proposed works, which would all take place within the current highway boundary, is contained within the Chapter 4: The Site and the Proposed Development. The proposals that have the potential for bringing about significant effects upon landscape and visual receptors are:

- Repositioning the southern section of the route to the west of its current alignment. Part of the old carriageway would be retained for pedestrian use and the remaining areas between the site boundary and the new alignment would be planted to assist in the creation of a structural tree belt;
- The slight realignment and widening (to the west) of the existing northern section of the carriageway.
- the creation of two traffic light-controlled crossing junctions – one near to Little Greys, the other near to the current Hillhurst Farm entrance;
- the creation of additional lanes, traffic lights and other visible highway infrastructure at the junction of the A20 with Stone Street and the A261 Hythe Road ; and
- the potential upgrading of the road to a dual carriageway (by widening it further to the west) depending upon the ‘monitoring’ of traffic levels during the construction period of the proposed Development.

OPM(P)4002_YY – Open Space and Vegetation

12.1.22 This shows the proposed key areas of open space, the retained existing structural vegetation, and the proposed structural planting.

Open Space

12.1.23 The parameter plan only shows the areas of strategic open space. It does not show the open space that would be created within each proposed Development area. The OP-DS identifies that this would amount to between 10-15% of each area (not including private residential gardens). The LVIA has been cognisant of these factors.

Existing vegetation

12.1.24 The LVIA has also been cognisant that, as outlined, in section 3 of the OP-DS that there would be a presumption in favour of the retention of the existing structural vegetation (woodland, trees, tree belts and hedgerows) shown upon the parameter plan, including those protected by Tree Preservation Orders (TPOs). The parameter plan does not show, however, the proposed breaks in the lines and areas of this vegetation that are likely to be required to facilitate the proposed Development (e.g. for example where proposed roads, footpaths/cycleway would cross through it). These breaks will be confirmed at the Tier 2 and Tier 3 stages once detailed tree and vegetation surveys (to BS5837(2012) have been conducted and the design has been further progressed.

12.1.25 The parameter plan does not also show the vegetation in front of Westenhanger Castle that, subject to further survey, would be removed - as outlined in the Conservation Management Plan in order to create improved visual linkages between it and the proposed strategic open space to the immediate south.

Structural Planting

12.1.26 Parameter plan *OPM(P)4002_YY* also shows the general location of proposed structural planting units (woodland, tree belts, tree lines, hedgerows etc.). The plan confirms that, whilst the precise detail of these units is to be defined at Tier 2, the general details of planting type and location (and whether or not the planting is carried out ‘in advance’) is set out within the appendix of the Green Infrastructure Strategy (GI-Strategy).

OPM(P)4003_YY – Heights.

12.1.27 This parameter plan shows the maximum building heights up to roof ridge lines above the existing ground levels (shown on supporting plan *OPM(P)1001_E Existing Context Plan*) that would be permitted within each proposed Development area. As

outlined in the OP-DS these heights include allowance for elements such as lift overruns, plant rooms, enclosed access to flat roofs, parapets, guard rails to roof edges and multi-storey car-parks, but do not account for small, isolated roof features such as chimneys.

- 12.1.28 These proposed Development area heights have informed the preparation of the LVIA, and the visualisations contained in ES Appendix 12.3.

Alternative set of Parameter Plans

- 12.1.29 Parameter Plans *OPM(P)5001_WW – Development Areas and Movement Corridors*, *OPM(P)5002_WW – Open Space and Vegetation* and *OPM(P)5003_WW – Heights* show the same detail as those described above, but contain the permitted waste facility at Otterpool Quarry.

- 12.1.30 The LVIA has been cognisant of the differing effects that are likely to occur should the facility be fully built out. The LVIA visualisations, however, adopt the scenario whereby the waste facility is not completed and the proposed development is constructed instead. This is because the built form of the proposed Development is likely to be taller and more extensive than the permitted waste facility.

Strategic Design Principles

- 12.1.31 The LVIA has been cognisant of the matters relating to land use, layout and connections as described in the SDP, as well as those relating to the character of the key open spaces and the built form between them.

Planning Documents and Plans in Support

- 12.1.32 The documents and plans that are submitted in support of the outline application and their relevance to the LVIA is set out in the paragraphs below:

Supporting Plans

OPM(P)1015 – Illustrative Masterplan (OPA document number 3.4)

- 12.1.33 Whilst the LVIA has not been reliant upon the Illustrative Masterplan in consideration of likely effects, it helps understand one likely reasonable way that the proposed Development could be developed in response to the documents for approval. It demonstrates the potential location of land-uses such as the town centre and local centres, key commercial areas and the main residential areas. It indicates illustratively the landscape open space in terms of parks, sports, burial grounds, allotments, as well as the position of key structural planting areas and SuDS. It shows the position of key movement and access routes (i.e. primary roads, bus routes, key bridleways and cycleways) and where they may cross through existing and proposed lines of woodland, tree belt or hedgerow.

OPM(P)4004 – Indicative Phases (OPA document number 3.3)

- 12.1.34 This plan represents a subdivision of the overall proposed Development area into phases/character areas primarily to assist in the understanding of the specific location of those place-specific specifications described in the SDP document. It does not indicate a certain chronological phasing of the proposed Development.
- 12.1.35 A masterplan and design code for each phase will come forward at Tiers 2 and 3.
- 12.1.36 As there is no chronological phasing of the proposed Development this LVIA adopts the worst case scenario that any of the phases could be constructed first. It is also assumed that the construction of these would be relatively sequential in so far that not all proposed Development areas would be constructed at once.

OPM(P)2018_YY_16-03-22 Existing Buildings to be Demolished & Retained

12.1.37 This plan divides the current buildings within the application site boundary into three categories:

- 1: to be demolished;
- 2: to be retained; and
- 3: where demolition/retention would be determined at Tier 2.

12.1.38 Those that are to be demolished. In relation to the LVIA this includes the entirety of Somerfield Court Farm, the majority of buildings associated with Folkestone Racecourse (including the barns to the immediate south of Westenhanger Castle), the modern buildings of Hillhurst Farm, the depot buildings at the south end of Stone Street, Westenhanger, the some of the houses along the north and south of the A20 between Newingreen and the settlement of Barrow Hill.

12.1.39 The LVIA adopts worst-case scenario whereby:

- The removal of those buildings for which permission for demolition is sought (i.e. 1 or 3) may in fact not take place until near the end of the construction period. Therefore the current occupiers dwelling and/or working there may in fact be present throughout the majority of the proposed Development's construction. Where this is the case it is assumed that the extent and contents of their landholding / building curtilage (i.e. including any existing buildings, boundary treatments and structural vegetation (trees shrubs hedges etc.)) and the routes of access between their premises and the public highway would also remain intact for the duration of the proposed Development's construction.
- The current occupiers dwelling and/or working in those buildings that would/could be retained (i.e. 2 or 3) may occupy them throughout the proposed Development's construction and operation - Where this is the case it is assumed that the extent and contents of their landholding / building curtilage (i.e. including any existing buildings, boundary treatments and structural vegetation (trees shrubs hedges etc.)) and the routes of access between their premises and the public highway would also remain intact for the duration of the proposed Development's construction and operation.
- Any number of buildings in category 3 could be retained. This includes the situations where all are retained, or where any one building could be retained singularly – whereby all others around it (apart from those in category 2 and those separately own buildings which are physically connected to another e.g. semi-detached buildings) would be demolished.

Supporting Documents

Illustrative accommodation schedule (ES Appendix 4.4),

12.1.40 This document sets out one way by which the proposed Development could be built-out sequentially across the 19 year construction period in terms of the number of completed houses, and the delivery of commercial floorspace, educational, community and other key infrastructure.

12.1.41 This has been used in this LVIA, and in elsewhere in the ES, to estimate the peak construction year 2030, when it is anticipated that approximately 2500 houses, 40% of the total retail space, and 12% of other commercial space would have been constructed along with an associated quantity of infrastructure including one secondary school, two primary schools, two doctors surgeries, the waste water treatment works, a proportionate degree of the road network, community facilities and GI.

Green Infrastructure Strategy (ES Appendix 4.11) (GI-Strategy)

12.1.42 The GI-Strategy identifies the existing green infrastructure resources at a subregional and local level and demonstrates ways by which Otterpool Park could integrate with and enhance these, and so deliver a wide range of landscape character and visual amenity related mitigation.

12.1.43 It provides a set of guiding principles to inform the tier 2 masterplanning and Design Codes and the Tier 3 reserved matter applications, and a number of commitments that Tier 2 and Tier 3 should meet.

Heritage Strategy (ES Appendix 4.12),

12.1.44 The Heritage Strategy establishes a set of actions to integrate the site's existing heritage into the design of Otterpool Park.

Governance and Stewardship Strategy (ES Appendix 4.13),

12.1.45 The Governance and Stewardship Strategy for Otterpool Park sets out for the long-term management and governance of all infrastructure of community benefit, including the strategic public open space and green infrastructure.

DAS (ES Appendix 4.16)

12.1.46 The document describes the site's context, the Proposed Development's design evolution and the considerations that have shaped the proposals. It states that it "*should be read alongside the parameter plans; and the intentions captured by the application drawings.*"

12.1.47 The OP-DS states that the DAS is not expected to be a planning document enforced by the conditional planning permission, but its contents should be reviewed and understood as a matter of good practice by any future author of a reserved matters application.

12.1.48 Therefore, the LVIA uses the contents of the DAS to better understand the thrust of the matters set out within the parameter plans and SDP.

Contemporary Kentish Vernacular Study (ES Appendix 12.5)

12.1.49 The CKVS identifies the character of built-form in settlements in the immediate vicinity of the site and elsewhere in this part of Kent. It uses this information to set out a number of design principles (including upon the layout, pattern, roof form, façade materials, colours and finishes, fenestration and reflectivity) for application and consideration in future design and planning stages.

12.1.50 Principle 18 of the SDP 'Materials and Detailing' confirms that the detailed masterplanning and Design Codes of the further tiered planning stages should "*have regard to*" the CKVS "*where appropriate.*"

12.2 Assessment Methodology

Legislation, Policy and Guidance

12.2.1 Legislation, planning policy and planning guidance at the national, regional and local levels which is relevant to this assessment is set out in the following paragraphs.

Legislation

The Countryside and Rights of Way Act 2000

12.2.2 The primary legislation relating to Areas of Outstanding Natural Beauty is set out in the Countryside and Rights of Way Act 2000 (CRoW Act). Section 85 of this Act requires that “*in exercising or performing any functions in relation to, or so as to affect*” land in such an area, a relevant authority “*shall have regard to their statutory purposes.*”

Planning Policy

National Planning Policy

12.2.3 National planning policies, which relate to the landscape character and/or visual amenity of the site and its surrounds, and which have been referred to in this assessment, where these may have a bearing on the proposed Development and its potential effects are set out below.

12.2.4 The latest version of the National Planning Policy Framework (NPPF) (Ref 12.1), published by the Ministry of Housing, Communities and Local Government in July 2021, sets out the Government’s planning policies for achieving and delivering sustainable development. Policies of particular relevance to this assessment of the proposed Development at Otterpool Park are highlighted in the following paragraphs.

12.2.5 With regard to the status of a planning authority’s strategic policies Paragraph 20 of the NPPF highlights that these “*should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for d) conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure... .*”

12.2.6 The glossary of the NPPF defines Green Infrastructure (GI) as a “*network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity.*”

12.2.7 Paragraph 130 seeks to ensure that developments:

“a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;

b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;

c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit.”

12.2.8 With particular regard to trees within developments, paragraph 131 states that:

“Planning policies and decisions should ensure that new streets are tree-lined, that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), that appropriate measures are in place to secure

the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible.”

- 12.2.9 Section 15 of the NPPF promotes planning decisions which “*contribute to and enhance the natural and local environment*” by “*protecting and enhancing valued landscapes*”; recognising the “*intrinsic character and beauty of the countryside*”; and “*remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate*” (paragraph 174).
- 12.2.10 With regards to designated landscapes, paragraph 175 of the NPPF require local planning authorities to “*distinguish between the hierarchy of international, national and locally designated sites; allocate land with the least environmental or amenity value*” within their plans.
- 12.2.11 Paragraph 176 highlights the great weight that should be given to “*conserving and enhancing [the] landscape and scenic beauty*” of Areas of Outstanding Natural Beauty and defines factors such as ‘scale and extent’ where development is proposed within these. It also states that development within the ‘setting’ of such designated areas “*should be sensitively located and designed to avoid or minimise adverse impacts*” on them.
- 12.2.12 In addition, paragraph 185 encourages planning decisions which “*identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason*”; and “*limit the impact of light pollution from artificial light on local amenity*” and “*intrinsically dark landscapes.*”
- 12.2.13 Section 16 of the NPPF address “*Conserving and enhancing the historic environment.*” With regards to landscape character impact assessment this section requires local planning authorities when determining applications to take account of the “*desirability of new development making a positive contribution to local character and distinctiveness*” and “*opportunities to draw on the contribution made by the historic environment to the character of a place*” (paragraph 190).

Local Planning Policy

- 12.2.14 The local planning policies, which relate to the landscape character and/or visual amenity of the site and its surrounds, and which have been referred to in this assessment, where these may have a bearing on the proposed Development and its potential effects, are set out below

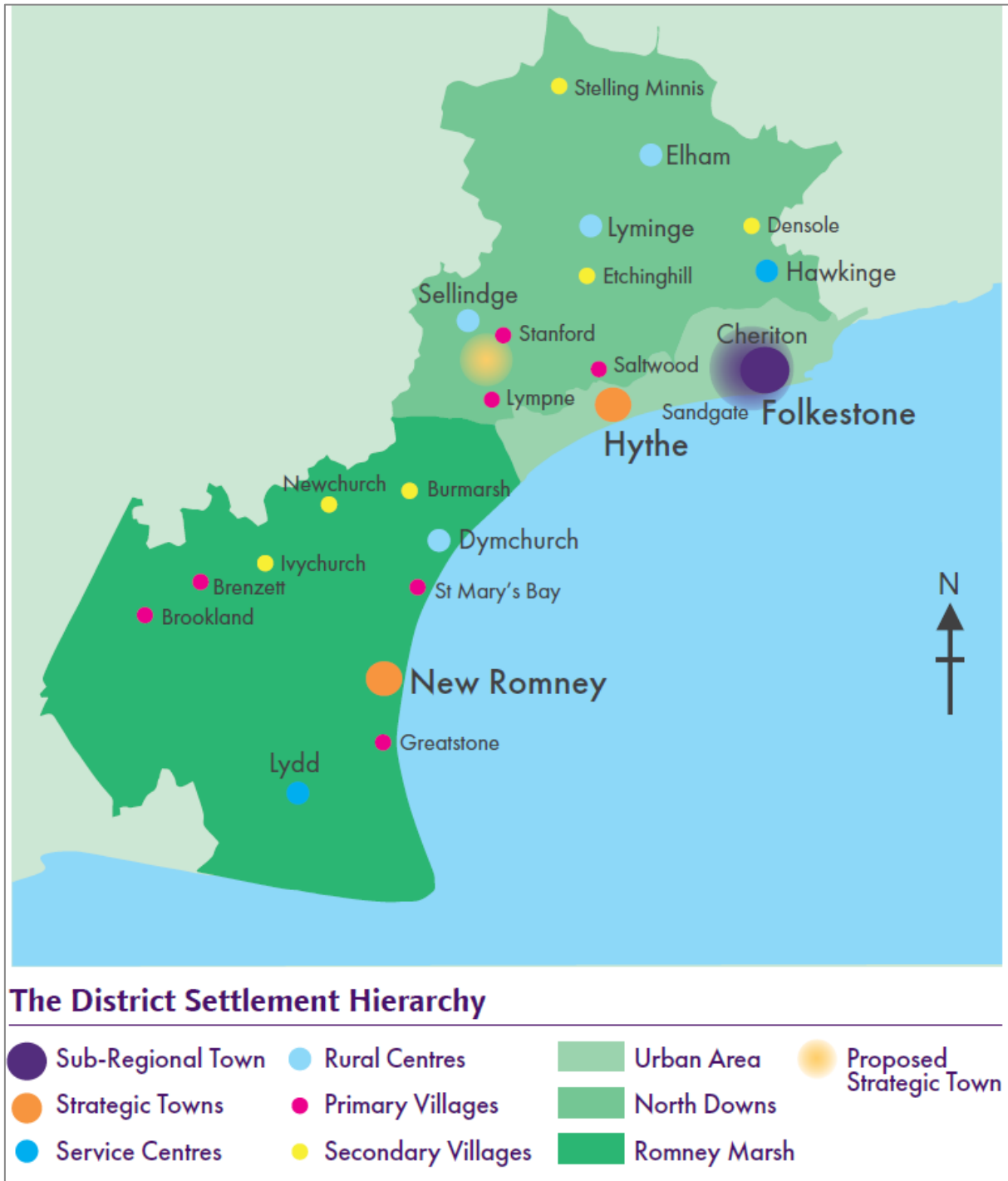
Folkestone & Hythe District Council

- 12.2.15 On 1 April 2018 Shepway District Council (SDC) changed its name to F&HDC. References to SDC are kept where they refer to published documents which still retain that name. Elsewhere the name of the council has been updated to F&HDC.
- 12.2.16 The adopted development plan for F&HDC consists of the *Core Strategy Review, 2022* (Ref 12.2) (CSR) the overarching planning policy document for the district, and the *Places and Policies Local Plan, 2020* (P&PLP) (Ref 12.3).
- 12.2.17 The relevant parts and provisions of those adopted policies which are applicable to this assessment are set out in the paragraphs below, grouped per topic.

Strategic & Spatial Policies

- 12.2.18 CSR policy SS1 introduces the three ‘character areas’ of the district, including the ‘*North Downs*’ area in which the site lies. The extent of the ‘*North Downs*’ area, in relation to the site (referred to as ‘*Proposed Strategic Town*’ of the map) is shown on Image 12-1.

Image 12-1 Extract from CSR: Figure 4.2 District Settlement Hierarchy



- 12.2.19 Within the ‘North Downs’ area, Policy CSR SS1 seeks a *“landscape-led sustainable new settlement based on garden town principles outside the Kent Downs Area of Outstanding Natural Beauty (AONB) boundary, designed to avoid or minimise adverse impacts on the AONB, and the expansion of Sellindge.”*
- 12.2.20 Policy CSR SS6 requires the New Garden Settlement to have:
“distinctive townscape and outstanding accessible landscape, both of which will be informed by the historic character of the area. ... It will be a landscape-led development that responds to its location within the setting of the Kent Downs AONB and the adjacent Lympne Escarpment with an emphasis on a network of green and blue spaces including woodland and other planting, open space and recreation that supports healthy living, encourages interaction between residents, enhances local biodiversity and mitigates impacts on views from the scarp of the Kent Downs.”
- 12.2.21 In addition it stipulates that:
“Given the location of the proposed new settlement and its relationship with the Kent Downs AONB, it is essential that the landscape-led proposals include appropriate structural landscaping in order to avoid or minimise adverse impacts on the AONB and views in and out of the AONB in accordance with policy SS7.”
- 12.2.22 Policy CSR SS7 sets out the Place Shaping Principles the garden settlement should adhere to. Primary amongst these is the need for a ‘landscape-led approach’ to the planning of the proposed Development. It states that:
“The design and layout of the development shall be landscape-led and include within it structural landscaping in order to avoid or minimise adverse impacts on the Kent Downs AONB and views into and out of the AONB. Where required to mitigate any such impacts arising from the development, structural planting shall be carried out at an appropriate stage in relation to each phase in order to optimize its effectiveness and include the provision of new habitats for priority nature conservation species. Applications shall be accompanied by a landscape and visual impact assessment that should inform the landscaping scheme at a structural and local level.”
- 12.2.23 Policy CSR SS7 also stipulates the need for a green and blue infrastructure strategy which delivers:
“1-i) Advanced woodland planting and habitat creation using native species to benefit later phases of development, particularly from prominent locations visible from the Kent Downs Area of Outstanding Natural Beauty, and to avoid as far as possible temporary loss of biodiversity value when construction begins. Advanced woodland planting, habitat creation and community green space shall also be designed to relate to local landscape character and to prevent the coalescence of the new settlement with Lympne and to separate neighbourhoods within the settlement itself. Planting and habitat creation should also be used to provide distance buffers between the M20/High Speed transport corridor for noise and air quality mitigation purposes.”
and
“1-viii) A long-term security and management plan of the Green Infrastructure estate which ensures community involvement and custodianship.”
- 12.2.24 With regards to the proposed Development’s town centre Policy SS7 states that:
“2a) A town centre shall be created, of higher density housing and town centre uses to act as a focal point to the settlement, providing for a mix of employment opportunities at the heart of the garden settlement. The town centre shall be planned so that it is within easy walking distance of the station and located within an area of higher density housing to increase its vitality and viability. Higher density mixed-use

development with several storeys of residential use above commercial premises will be appropriate in the town centre.”

12.2.25 With regards to townscape character, item 3d) of Policy SS7 requires each individual neighbourhood within the overall proposed Development to *“be designed to have its own distinctive identity, to create a special character within the unique setting of the Kent Downs.”*

12.2.26 In addition:

“4a) Neighbourhoods, buildings and spaces within the settlement shall be planned to create a unique and distinctive character, taking advantage of long-range and local views to create interest and drawing on the historic character and grain of the area;

4c) A high quality palette of building materials will be used throughout, drawing on a thorough understanding of local distinctiveness, landscape, local materials and tone. Building materials, landscaping, including the use of mature trees, and design should be of a consistently high quality regardless of tenure;

4e) External lighting should be designed to support the aims of the Kent Downs Management Plan on Dark Skies and the Institution of Lighting Professionals (ILP) Guidance Notes for the Reduction of Light Pollution, to ensure the impact of lighting is minimised and that the most efficient technology is used.”

Designated Landscapes & Green Infrastructure

12.2.27 CSR policy CSD4 Green Infrastructure of Natural Networks, Open Spaces and Recreation requires that *“planning decisions will have close regard to the need for conservation and enhancement of landscape and scenic beauty in the Kent Downs Area of Outstanding Natural Beauty (AONB) which will be given the highest status of protection in relation to these issues. Development within the setting of the AONB should be sensitively located and avoid or minimise adverse impacts on the AONB.”*

12.2.28 F&HDC-P&PLP policy NE3 *Protecting the District's Landscapes and Countryside* affirms the District's position on designated and non-designated landscapes.

12.2.29 With regards to the Kent Downs AONB policy NE3 sets a number of criteria with which permissible development must accord:

- “1. The natural beauty and locally distinctive features of the AONB and its setting are conserved and enhanced;
- 2. Proposals reinforce and respond to, rather than detract from, the distinctive character and special qualities including tranquillity of the AONB. The design scale, setting and materials of new development must be appropriate to the AONB;
- 3. Either individually or cumulatively, development does not lead to actual or perceived coalescence of settlements or undermine the integrity of the predominantly open and undeveloped, rural character of the AONB and its setting;
- 4. Development is appropriate to the economic, social and environmental well-being of the area or is desirable for the understanding and enjoyment of the area (where this is consistent with the primary purpose of conserving and enhancing natural beauty); and
- 5. Development meets the policy aims of the Kent Downs AONB Management Plan and AONB Unit produced supporting design guidance.”

12.2.30 With regards to SLAs policy NE3 states that development proposals *“protect or enhance the natural beauty”* these areas of *“county-wide significance”* “unless the need to secure economic and social wellbeing outweighs the need to protect” them.

Figure 12.2 in ES Appendix 12.3 shows the location of the ‘North Downs’ SLA in relation to the site.

- 12.2.31 Policy NE3 also sets out guidance on *Local Landscape Areas* – of which there are none in relation to the site.
- 12.2.32 Finally, policy NE3 refers to ‘*Landscape Character Areas*’. Whilst the origin of these areas is not made explicit it is assumed, for the purpose of this assessment, that this refers to the *High Level Landscape Appraisal* (Ref 12.4) (SDC-HLLA) that was published by F&HDC in February 2017 as part of the *Growth Options Study* (Ref 12.5). With regard to ‘*Landscape Character Areas*’ Policy NE3 states that “*proposals should demonstrate that their siting and design are compatible with the pattern of natural and man-made features of the Landscape Character Areas, including their cultural and historical associations. Opportunities for remediation and improvement of damaged landscapes will be taken as they arise.*”

Built Environment

- 12.2.33 F&HDC-P&PLP policy HB1 ‘Quality Places Through Design’ requires development to:
- 1) make a “positive contribution to its location and surroundings, enhancing integration while also respecting existing buildings and land uses, particularly with regard to layout, scale, proportions, massing, form, density, materiality and mix of uses so as to ensure all proposals create places of character;”
 - 3) “Creates, enhances and integrates areas of public open space, green infrastructure, biodiversity and heritage and other public realm assets;” and
 - 4) “not lead to an adverse impact on the amenity of future occupiers, neighbours, or the surrounding area, taking account of loss of privacy, loss of light and poor outlook in assessing the potential impacts.”
- 12.2.34 F&HDC-P&PLP policy HB2 ‘Cohesive Design’ requires major housing developments to:
- “1) Integrates into its surroundings by reinforcing existing connections and creating new ones where appropriate; while also respecting existing buildings and land-uses along the boundaries of the development site.”
 - 5) “Create a place with a locally inspired or otherwise distinctive character, well related to the local landscape character.”
 - 6) “Take advantage of existing topography, landscape features (including water courses), trees which contribute positively to the landscape; wildlife habitats, existing buildings, heritage assets, site orientation and micro-climates.”
 - 7) “Integrates buildings with landscaping to define and enhance streets and spaces and turn street corners well.”
- 12.2.35 F&HDC-P&PLP policy NE5 Light Pollution and External Illumination states that “*applications for major development, and development including significant external lighting, will be approved if: 1. The proposal does not materially alter light levels outside the development site; 2. The proposal does not adversely affect the use or enjoyment of nearby buildings or open spaces; and 3. The proposed lighting scheme accords with the best practice guidance provided by the Institution of Lighting Professionals (ILP) (2011) relevant to the particular Environmental Zone.*” (Note: the ILP guidance was updated in 2021 – see Ref 12.6).
- 12.2.36 On the basis that the site: borders the Kent Downs AONB; contains a geological site of Special Scientific Interest (SSSI); and is located in a partially rural area, but balanced with the fact that the CSR acknowledge the potential of new garden

settlement as a ‘*Strategic Town*’ (CSR, *Table 4.4 District Settlement Hierarchy*) alongside Hythe and New Romney, the ‘*environment zones*’ set out in Table 12-1 are relevant to this assessment.

Table 12-1 Extract from F&HDC-P&PLP Policy NE5 - Table 14.1: Obtrusive Light Limitations for External Lighting Installation

Zone	What is acceptable?	Where does this apply?
E1	<p>Natural: External lighting to be limited to accord with ILP lighting guidance for this zone.</p> <p>Decorative lighting generally settlement inappropriate</p> <p>All lighting must be extinguished after 23:00 except in exceptional circumstances.</p>	<p>Kent Downs AONB;</p> <p>Sites of Special Scientific Interest;</p> <p>Rural areas outside settlement confines.</p>
E2	<p>Rural: For large-scale developments, lighting levels should accord with ILP technical guidance for this zone.</p>	<p>Within identified secondary and primary village confines, Hawkinge, Seabrook, Saltwood, and suburban areas of New Romney, and Hythe.</p>
E3	<p>Suburban: External lighting levels should accord with ILP technical guidance for this zone</p>	<p>Suburbs of Folkestone, and New Romney and Hythe town centres.</p>
E4	<p>Urban: External lighting levels should accord with ILP technical guidance for this zone. Street lighting proposals should be carefully planned and specified to achieve best practice in light pollution control.</p>	<p>Within Folkestone town centre</p>

12.2.37 Policy NE5 requires that “*applications should include a lighting assessment with details of the following: Where the light shines; When the light shines; How much light shines; and Possible ecological impact.*”

Outdoor Recreation

12.2.38 F&HDC-P&PLP policy HW4 ‘Promoting Active Travel’ seeks developments which ensure the “*protection and improvement of existing cycle and walking routes, including the public rights of way network, to ensure the effectiveness and amenity of these routes is maintained, including through maintenance, crossings, signposting and way-marking, and, where appropriate, widening and lighting.*”

Ashford Borough Council

12.2.39 A substantial proportion of the study area for this assessment covers part of the administrative area of ABC. Whilst ABC is not the determining authority for the planning application that this assessment forms part of its policies in respect of potential significant landscape and visual effects arising from the proposed Development, are relevant to this section.

12.2.40 The ABC *Local Plan, 2030* (ABC-LP) (Ref 12.7) forms the adopted development plan for the Borough.

12.2.41 The ABC-LP contains a number of policies relevant to this assessment. These are set out below.

12.2.42 ABC-LP policy ENV3b: Landscape Character and Design in the AONB states that all proposals affecting the setting of the AONB will only be permitted where:

- The location, form, scale, materials and design would conserve and where appropriate enhance or restore the character of the landscape.
 - The development would enhance the special qualities, distinctive character and tranquillity of the AONB.
 - The development has regard to the relevant AONB management plan and any associated guidance.
 - The development demonstrates particular regard to those characteristics outlined in Policy ENV3a, proportionate to the high landscape significance of the AONB.
- 12.2.43 The amplification of Policy ENV3b states that within the setting of the AONBs, *“priority will be given over other planning considerations to the conservation or enhancement of natural beauty, including landscape, wildlife and geological features, while recognising that landscape considerations carry less weight than within these designations. At the same time, due regard will be had to the economic and social well-being of the area.”*
- 12.2.44 ABC-LP Policy ENV4 ‘Light Pollution and Promoting Dark Skies’ states that all *“proposals will be expected to comply with the guidance and requirements set out in the Council’s Dark Skies SPD (2014).”*
- 12.2.45 In addition, Map 7 of the ABC shows the area of the Borough where ABC intend to create a ‘dark sky zone’. This abuts the ABC boundary that is closest to the site. Policy ENV4 states that *“within the area proposed to be designated as a ‘dark sky zone’, proposals will only be permitted where... they can demonstrate that there will be no significant adverse effects on the visibility of the night sky or its intrinsically dark landscapes.”*

Guidance

National Level

National Planning Practice Guidance

- 12.2.46 The *National Planning Practice Guidance* (Ref 12.8) (NPPG) is a supplementary suite of guidance prepared by the Ministry of Housing, Communities & Local Government covering a variety of topics.

Natural Environment – Landscape

- 12.2.47 In respect of the planning policies which the proposed Development must accord to, paragraph 036 (Reference ID: 8-036-20190721, Revision date: 21-07-2019) states that:

“Where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence. Policies may set out criteria against which proposals for development affecting these areas will be assessed. Plans can also include policies to avoid adverse impacts on landscapes and to set out necessary mitigation measures, such as appropriate design principles and visual screening, where necessary. The cumulative impacts of development on the landscape need to be considered carefully.”

- 12.2.48 In respect of landscape character impact upon the AONB, paragraph 037 (Reference ID: 8-037-20190721, Revision date: 21-07-2019) states that:

“For a designated landscape, the relevant management plan will contain further information on the area’s particular character and beauty.

Where appropriate, landscape character assessments can be prepared to complement Natural England’s National Character Area profiles. Natural England provides guidance on undertaking these assessments.

To help assess the type and scale of development that might be able to be accommodated without compromising landscape character, a Landscape Sensitivity and Capacity Assessment can be completed.

To demonstrate the likely effects of a proposed development on the landscape, a Landscape and Visual Impact Assessment can be used.”

- 12.2.49 In respect of the status of management plans for areas such as the AONB, and their role in the planning decision making process, paragraph 040 (Reference ID: 8-040-20190721, Revision date: 21-07-2019) states that these:

“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.”

- 12.2.50 Where new development may affect the setting of an AOB the NPPG, paragraph 042 (Reference ID: 8-042-20190721, Revision date: 21-07-2019) states that these:

“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.”

Natural Environment – Green Infrastructure

- 12.2.51 In respect of what aspects of the Development are considered GI, paragraph 004 (Reference ID: 8-004-20190721, Revision date: 21-07-2019) states that:

“Green infrastructure can embrace a range of spaces and assets that provide environmental and wider benefits. It can, for example, include parks, playing fields, other areas of open space, woodland, allotments, private gardens, sustainable drainage features, green roofs and walls, street trees and ‘blue infrastructure’ such as streams, ponds, canals and other water bodies. References to green infrastructure in this guidance also apply to different types of blue infrastructure where appropriate.”

- 12.2.52 In respect of how the Development’s GI can contribute to landscape character conservation and enhancement, paragraph 006 (Reference ID: 8-004-20190721, Revision date: 21-07-2019) states that:

“...green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place and natural beauty.”

Light Pollution

- 12.2.53 Paragraph 001 (Reference ID: 31-001-20191101, Revision date: 01-11-2019) states that artificial light *“provides valuable benefits to society, including through extending opportunities for sport and recreation, and can be essential to a new development”*. Equally, it stresses that it *“has the potential to become what is termed ‘light pollution’ or ‘obtrusive light’ It can be a source of annoyance to people, ... undermine enjoyment of the countryside or the night sky especially in areas with intrinsically dark landscapes.”*

- 12.2.54 Paragraph 002 (Reference ID: 31-002-20191101, Revision date: 01-11-2019) raises matters for consideration in managing the possible effects of light pollution. These

include whether a new development is likely to “*materially alter light levels in the environment around its site*”, and whether a new development is “*near a protected area of dark sky or an intrinsically dark landscape where new lighting would be conspicuously out of keeping with local nocturnal light levels, making it desirable to minimise or avoid new lighting.*”

- 12.2.55 In addition, Paragraph 005 (Reference ID: 31-005-20191101, Revision date: 01-11-2019) states that the “character of the area and the surrounding environment may affect what will be considered an appropriate level of lighting for a development.”
- 12.2.56 Paragraph 003 (Reference ID: 31-003-20191101, Revision date: 01-11-2019), Paragraph: 004 (Reference ID: 31-004-20191101, Revision date: 01-11-2019) and Paragraph 005 (Reference ID: 31-005-20191101, Revision date: 01-11-2019) provide guidance upon how ‘*light-intrusion*’ can be avoided. Paragraph 003 states that ‘*light-intrusion*’ can “*usually be avoided with careful lamp and luminaire selection and positioning*” and timing.
- 12.2.57 This would involve: avoiding “*lighting near or above the horizontal ... to reduce glare and sky glow (the brightening of the night sky)*”; implementing ‘*part-night lighting*’ “*when a business is closed or between midnight and 5am or 6am*”; and dimming lighting “*to minimise its visual impact at times of reduced need or increased sensitivity.*” Paragraph 004 states that “*planning conditions could potentially require this where necessary.*”

Local

F&HDC Supplementary Planning Guidance

- 12.2.58 F&HDC have adopted a number of ‘*supplementary planning documents*’ (SPD) to expand upon or add details to policies laid out in their local plan documents. SPD’s are material considerations for F&HDC when considering planning applications. A description of those that are applicable to this assessment, and their particular areas of relevance are set out in the paragraphs below. There are however SPDs relating to plots of land within the site where existing planning permissions and allocations have been granted. A description of these is located in the *Future Baseline* section (12.3) of this assessment.

The Kent Design Guide

- 12.2.59 The Kent Design Guide (Ref 12.9) (KDG), adopted by F&HDC as an SPD on 20th June 2007, aims to “*encourage well considered and contextually sympathetic schemes that create developments where people really want to live, work and enjoy life.*”

The Kent Downs AONB Landscape Design Handbook

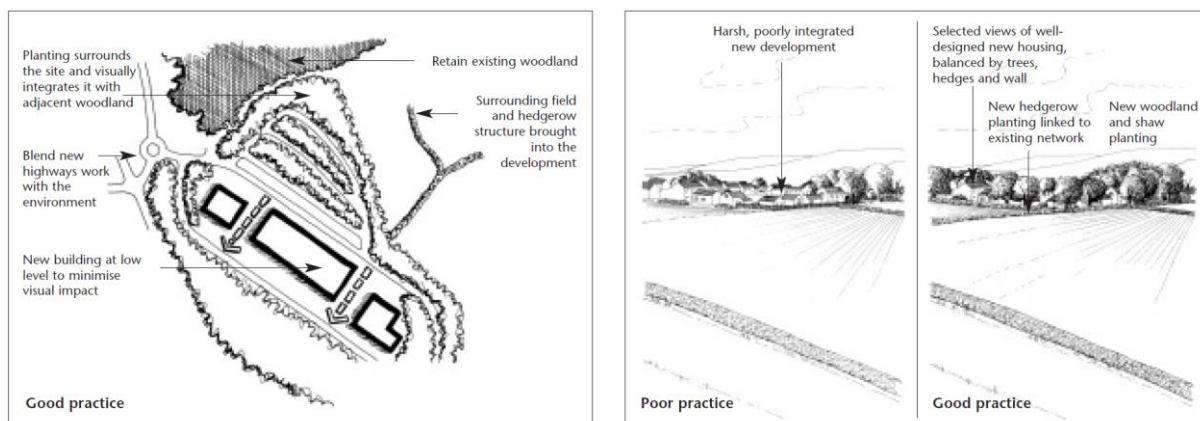
- 12.2.60 The Kent Downs AONB Landscape Design Handbook (Ref 12.10) (AONB-LDH) was adopted by F&HDC in 2006. Paragraph 1.2 states that it aims to “*provide design guidance to contribute to the conservation and enhancement of the special characteristics of the AONB as a whole, and the distinctiveness of its individual character areas.*” This paragraph also states that “*the guidelines are not meant to inhibit innovative design, but to provide a sound framework and information basis from which sympathetic design and management can be developed.*” With regards to the current Kent Downs AONB Management Plan (2021-2026) (Ref 12.11) paragraph 1.6 states that the AONB-LDH contributes to “*the implementation of the management plan objectives and policies.*”
- 12.2.61 Whilst the AONB-LDH neither addresses development outside of the AONB, or development of the scale being assessed within this assessment, there are design principles listed within it that have been worthy of consideration during the planning of the proposed Development.

12.2.62 With regards to new built development, section 2.2 of the AONB-LDH states that the “*presumption should be against AONB edge developments where they impact upon views into and out of the AONB landscape*”. The AONB-LDH states that where this is unavoidable ensure that:

- “buildings and infrastructure are located to avoid loss of important off-site views towards features such as church towers, fine buildings, or the wider landscape, as well as avoiding intrusion onto sensitive ridgelines, prominent slopes and damage to distinctive landscape settings.
- Seek to retain key landscape features on development sites – such as woodland, shaws, hedgerows, orchards, mature trees, watercourses and ponds as a basis for the new landscape structure and setting of the site.
- Avoid straight lines or regimented buildings on the settlement edge for new development.
- Integrate new development in keeping with local character, using open space and planting to provide a visual link to the countryside and an attractive backdrop/foil to development.
- Secure and manage native woodland, shaws (narrow belts of woodland, which are a remnant of larger woods but which have been cut back by fields), hedgerow and tree planting to integrate and/or screen new and existing developments. (Refer to suggestions for planting species within Landscape Character Areas).
- Consider massing, form, height and colour, texture of buildings and structures, taking account of local distinctiveness and characteristics.”

12.2.63 Page 6 of the AONB-LDH graphically demonstrates how new built development should be integrated into its rural edge. An extract from this is shown in Image 12-2.

Image 12-2 Extract from AONB-LDH – Page 6 – Guidelines for integration of commercial and residential urban edge development



12.2.64 Section 2.2 of the AONB-LDH also provides general guidelines on aspects of material choice and colour, lighting and fencing, that are more applicable to the detailed planning application stage of any future Otterpool Park proposals.

12.2.65 The AONB-LDH sets out a number of particular landscape design guidelines for those landscape character areas (LCAs) defined in the Countryside Commission’s *Landscape Assessment of the Kent Downs AONB* (Ref 12.12). The LCAs that are relevant to the site are: *East Kent Downs*, *Stour Valley*, *Postling Vale*, and *Lympne*. The guidelines for each provide recommendations for native woodland and hedgerow species that are particular to these areas and the local character areas within them. These have been referenced in section 12.4 of this assessment.

F&HDC development plan Evidence Base

12.2.66 A description of the documents, applicable to this assessment, that form the ‘evidence base’ for CSR and P&PLP and their particular areas of relevance is set out in the paragraphs below.

The Shepway Green Infrastructure Report

12.2.67 The *Shepway Green Infrastructure Report* (Ref 12.13) (SGIR) defines the typology, components, functions and benefits of GI across the District. The report’s main focus is upon the GI aspects of biodiversity, linear resources, areas of civic amenity. With regards to key GI issues and opportunities concerning the strategic development sites of Folkestone Racecourse it states that: improved management of the East Stour River corridor is required; the creation of areas of biodiversity, civic amenity, a neighbourhood green, and sustainable drainage systems (SuDS) should feature in development proposals; and that there should be improved PRow links to the North Downs Way, Saxon Shore Way and the Royal Military Canal path.

Romney Marsh Local Character Assessment

12.2.68 The findings of the *Romney Marsh Local Character Assessment* (Ref 12.14) (RM-LCA) are set out in section 12.3 of this Chapter.

Guidance Notes for the Reduction of Obtrusive Light

12.2.69 The ILP’s *Guidance Notes for the Reduction of Obtrusive Light* (GNROL) (Ref 12.6) provides; definitions for the different types of ‘obtrusive light’; principles for good lighting design; environmental zones for lighting; and guidance in terms of luminance, light intensity, and light fitting types.

Kent Downs AONB Rural Streets and Lanes Design Handbook

12.2.70 The *Kent Downs AONB Rural Streets and Lanes Design Handbook* (Ref 12.15) (AONB-RS&LDH) sets out: the contextual need for the guidance; design principles to adopt when planning changes to highways, junctions and streetscapes; and case study designs within particular pertinence to the AONB.

Kent Downs AONB Management Plan

12.2.71 The *Kent Downs AONB Management Plan* (AONB-MP) has been prepared by the AONB Unit with the AONB Joint Advisory Committee (AONB-JAC). It describes the ‘*special characteristics and qualities*’ of the AONB, establishes long-term visions and policies for a five year period for these, and sets out methods for their implementation and future monitoring.

12.2.72 The AONB-MP (2014-2019) (Ref 12.16) that was present during the preparation of the majority of this LVIA has been superseded by the AONB-MP (2021-2026) in the last few months.

12.2.73 The webpage for the AONB-MP (Ref 12.17) states that the “Management Plan (2021-2026) has now been adopted and is currently being designed in full colour ahead of publication.”

12.2.74 F&HDC adopted the draft of the AONB-MP (2021-2026) in April 2021. The associated Council Committee report (Ref 12.18) stated that the “*formal date for adoption be shortly after the last of the 12 local authorities resolves to adopt the plan – this will be confirmed to the council by the Kent Downs AONB Unit.*”

12.2.75 Therefore the LVIA refers primarily to the emerging AONB-MP (2021-2026) but also makes reference the AONB-MP (2014-2019) where required.

12.2.76 Section 2.2.2 of the AONB-MP (2021-2026) states that the management plans overall aim is to “*achieve the purpose of AONB designation.*” In contrast to the AONB-MP (2014-2019), however, section 2.2.22 of the emerging version describes how the whole document represents their policy to achieve this, and that “*what were described as ‘Policies’ in previous versions of the plan are now described as ‘Principles’.*”

12.2.77 These ‘*principles*’, along with ‘*aims*’ and ‘*opportunities and threats*’ are set out for the following topics, ‘*components*’ and ‘*special characteristics and qualities*’ of the Kent Downs are described:

- dramatic landform and views - a distinctive landscape character;
- biodiversity-rich habitats;
- farmed landscape;
- woodland and trees;
- a rich legacy of historic and cultural heritage;
- the Heritage Coasts;
- geology and natural resources;
- vibrant communities; and
- access, enjoyment and understanding.

12.2.78 The ‘*principles*’ of these components, which are relevant to the site and this assessment, are set out within Table 12-2 of this LVIA. The detailed aspects related to landscape character and visual amenity that inform the ‘*special characteristics and qualities*’, and which are relevant to the site, are described in more detail in section 12.3 – *Baseline* of this Chapter.

12.2.79 Before consideration of the ‘principles’, Section 3.1.2 of the AONB-MB (2021-2026) states that certain over-arching ‘guiding themes’ and ‘recurrent themes’ should be considered beforehand.

12.2.80 The ‘guiding themes’ are:

- *natural capital and the provision of resilient ecosystem services* - which include the ‘cultural services’ such as recreation and aesthetic value;
- *climate change in the Kent Downs*: – the vulnerability of the AONB to changes in the natural environment and how nature-based responses can be coherent with the AONB’s landscape character and qualities.
- ecological loss and nature recovery;
- *a landscape led approach, local character and qualities* – how the application of a ‘landscape-led’ approach to development planning starts with an understanding of the landscape in terms a site’s setting, context, character, qualities, distinctiveness, sense of place, patterns and sensitivities, how it is perceived by people, and for what reasons it is valued by people. It states how applying “*best practice and an iterative approach are key in practice to conserve and enhance the natural beauty of the AONB.*”
- intended net gain; and
- green infrastructure provision – described as a “an essential component of good planning for urban and rural areas” and a “key tool to create a resilient environment in the face of climate change supporting biodiversity and access opportunities.”

12.2.81 The ‘recurring themes’ are those topics recognised by the AONB-MP (2021-2026) as having “*strategic importance to the landscape management of the AONB*” – paragraph 3.3:

- ‘Tranquillity and remoteness’ – The AONB-MP (2021-2026) describes how the conservation and enhancement of areas which have remained relatively undisturbed by noise, light and movement, are valued by the public and form part of the special characteristics and qualities of the Kent Downs.
- ‘Setting’ – whilst recognising that development 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”, the AONB-MP (2021-2026) states that “where the qualities of the AONB which were instrumental in reasons for its designation are affected by proposals in the setting, then the impacts should be given considerable weight in decisions”. Acknowledgement of the AONB Unit’s ‘Setting Position Statement’ (Ref 12.19) (AONB-SPS) is made further on in section 12.2 of this LVIA.
- ‘Design and materials’ – recognising that “*special characteristics and qualities of the Kent Downs include the quality of the built heritage and settlement patterns*” the AONB-MP (2021-2026) highlights the importance of conserving and enhancing the natural and scenic beauty of the Kent Downs through consideration of the “*scale, extent and design of new development...*”. To support this the AONB-MP (2021-2026) advocates use of the AONB Unit’s design guidance documents. It also states that “*new development should use available, sustainably sourced traditional as well as appropriate new materials and a design approach which fits neatly with and complements the valued traditions, forms and patterns of the past, while securing environmental efficiency and affordability.*”

- ‘Mitigation’ – The ‘mitigation hierarchy’ of ‘avoid’, ‘pursue alternatives’, ‘ameliorate’ and ‘compensate’, as set out in the NPPF. The AONB-MP recognises that where impacts on the AONB may not be mitigated satisfactorily the “*AONB partnership will seek compensatory measures to enable conservation and enhancement of the landscape elsewhere in the AONB.*”

Table 12-2 Relevant Principles of the AONB-MP (2021-2026)

AONB-MP (2021-2026) Component	Principles
The Management of the Kent Downs AONB	MMP2 states that the AONB-MP (2021-2026) is a material consideration in decision taking and so local authorities will give a high priority to its vision, aims, principles and actions in development management decisions.
Sustainable Development	SD2 states that the “ <i>local character, qualities, distinctiveness and natural resources</i> ” of the AONB will be “ <i>conserved and enhanced in the design, scale, siting, landscaping and materials of new development, redevelopment and infrastructure and will be pursued through the application of appropriate design guidance and position statements.</i> ”
	SD9 expects new developments to “ <i>apply appropriate design guidance and to be complementary to local character in form, siting, scale, contribution to settlement pattern and choice of materials.</i> ”
	SD11 states that should major development have a negative impact on the landscape character, characteristics and qualities of the AONB or its setting, “ <i>mitigation and or compensatory measures appropriate to the national importance of the Kent Downs landscape will be identified, pursued, implemented and maintained.</i> ”
Landform and Landscape Character	LLC1 “ <i>The protection, conservation and enhancement of special characteristics and qualities, natural beauty and landscape character of the AONB will be supported and pursued.</i> ”
	LLC5 Proposals impacting the AONB should be informed by the revised AONB Landscape Character Assessment.

12.2.82 Further, section 3.1.2 of the AONB-MB states that in the “*absence of local criteria-based policies, the intention is that this management plan’s vision, aims and principles will provide helpful evidence to assist with decision making.*”

AONB - Setting Position Statement

12.2.83 The AONB-JAC have prepared AONB-SPS. The introduction to the document states that this is an advisory document, intended to provide “*further guidance on issues of setting for local planning authorities, land owners and other interested parties*”. The AONB-SPS “*focuses on ensuring avoidance of harm and the conservation and enhancement of the setting of the AONB, through good design and the incorporation of appropriate mitigation measures.*”

12.2.84 As previously described in the AONB-MP, the AONB-SPS, in section 4, affirms the view that the AONB’s setting “*does not have a geographical border*” but in most cases “*comprises land outside the AONB which is visible from the AONB and from which the AONB can be seen*”. It recognises that in some cases “*the setting area will be compact and close to the AONB boundary, perhaps because of natural or human made barriers or because of the nature of the proposed change. However, the setting area maybe substantial for example where there is a contrast in topography between higher and lower ground.*”

- 12.2.85 The AONB-SPS lists those locations where development and changes to the landscape in the setting of the AONB “*may be more keenly felt*” in views to and from them. Of the seven listed in the AONB-SPS three are associated with the site:
- “Scarp of the Kent Downs to the Vale of Holmesdale - the valley that lies at the foot of the North Downs and incorporates the A20/M20, M26 and M25 corridors,
 - Views from the Lympe escarpment to the Romney Marsh and from the Greensand Ridge.
 - Views from the Greensand Ridge, particularly those over the Weald of Kent and towards the North Downs.”
- 12.2.86 Section 2 underlines the description in the AONB-MP (2021-2026) that “*views out from the chalk scarp of the Kent Downs over its setting was a key reason for the designation of the Kent Downs AONB back in 1968. This feature has remained critical to its value and to public enjoyment ever since and today is recognised as one of its special characteristics and qualities*”. Section 1.2 of the AONB Management Plan, on ‘Special characteristics and qualities’ states: “*The Kent Downs dramatic and diverse topography is based on underlying geology. These features comprise: impressive south-facing scarps of chalk and greensand....Breath-taking, long-distance panoramas are offered across open countryside, estuaries and the sea from the scarp [sic], cliffs and plateaux...*”
- 12.2.87 In contrast to this Section 1.2.1 of the AONB-MP (2014-2019) considered that towns were also a component of such views. It’s text read (my underlining): “*Breathtaking, long-distance panoramas are offered across open countryside, estuaries, towns and the sea from the scarp, cliffs and plateaux; the dip slope dry valleys and river valleys provide more intimate and enclosed vistas.*”
- 12.2.88 The AONB-MP (2014-2019) reiterated the contribution that towns made to such views at section 4.2 when it describes the views from the North Downs in particular as (my underlining): “*Spectacular views are offered along the chalk escarpment across the Vale of Holmesdale, Low Weald, the river valleys and the towns below making the setting important to the enjoyment and purposes of the AONB. Perhaps more surprising and intriguing are the views from the highest and most open parts of the plateau and dip-slopes looking towards London and the Medway, Thames and Swale estuaries.*”
- 12.2.89 Section 5 of the AONB-SPS lists examples of adverse impacts on the setting of the AONB. These include:
- development which would have a significant impact on views in or out of the AONB;
 - loss of tranquillity through the introduction or increase of lighting, noise, or traffic movement or other environmental impact including dust, vibration and reduction in air quality;
 - introduction of abrupt change of landscape character;
 - loss or harm to heritage assets and natural landscape, particularly if these are contiguous with the AONB;
 - development giving rise to significantly increased traffic flows to and from the AONB, resulting in erosion of the character of rural roads and lanes; and
 - increased recreational pressure as a result of development in close proximity to the AONB.
- 12.2.90 This LVIA assesses the impact of the proposed Development upon the setting of the AONB in terms of landscape character and visual amenity. Other Chapters of this ES

assess the impact upon the setting in terms of heritage, air quality, noise, traffic, and recreation.

12.2.91 Section 6 of the AONB-SPS recognises the cumulative impacts that can also arise from multiple developments within the setting of the AONB, highlighting that these are of “*particular concern in the views to and from the scarp of the North Downs to the Vale of Holmesdale*”, and noting the “*juxtaposition of the dramatic landform with the transport corridor and the settlements around them on the lower ground mean it is a focus of attention for new development.*”

12.2.92 Section 7 of the AONB-SPS identifies that many of the adverse impacts upon the AONB from new development or landscape change within its setting “*can be resolved through careful design and incorporation of appropriate mitigation and/or management measures.*” As well as endorsing those recommended in the AONB-LDH, the AONB-SPS also lists:

- care over orientation, site layout, height, scale and massing of structures and buildings to minimise impact when viewed from the AONB;
- appropriate densities to allow for significant tree planting between buildings;
- consideration not just of the site but also the landscape, land-uses and heritage assets around and beyond it;
- careful use of colours, materials and non-reflective surfaces;
- restraint and care over the installation and use of external lighting including street lighting, to prevent harm to the dark night skies of the AONB. Where essential, lighting should be well-directed and full cut off and of low level in form and lumen intensity;
- the grouping of new structures and buildings close to existing structures and buildings to avoid new expanses of development that are visible and out of context; and
- detailed mitigation and management measures, for example including native landscaping that is locally appropriate (where possible contributing to Biodiversity Action Plan targets) and noise reduction.

F&HDC Growth Options Study

12.2.93 The ‘*evidence base*’ for the CSR included a *Growth Options Study* to identify and test potential approaches to strategic planning for future growth in the district. This study includes a suite of three related documents:

- Shepway Strategic Growth Options Report: ‘High Level Options Report’ (SDC-HLOR) (Ref 12.20)
- Shepway Strategic Growth Options Report: ‘Phase Two Report’ (SDC-PTR) (Ref 12.21)
- SDC-HLLA.

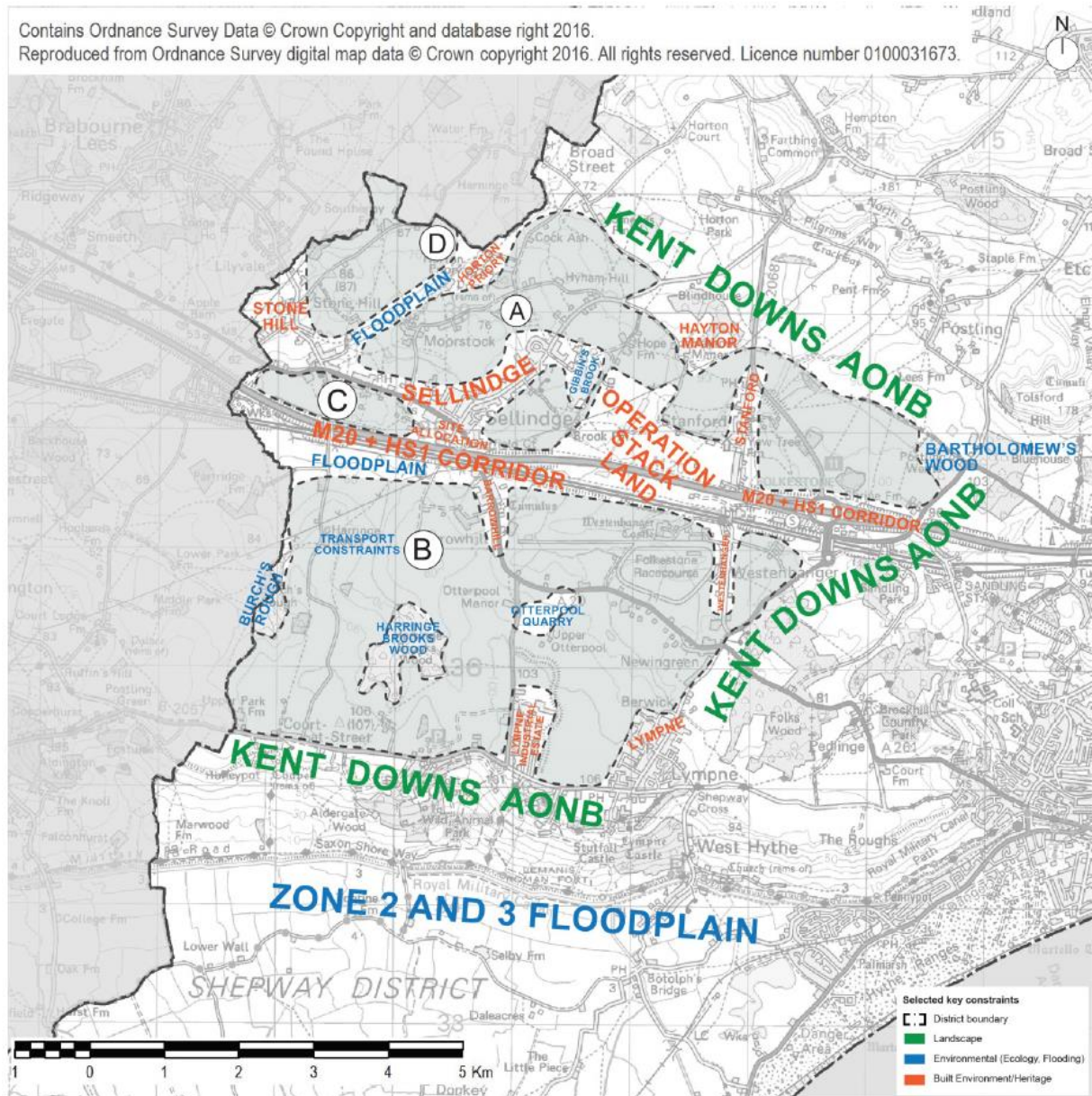
12.2.94 Whilst the findings of the SDC-HLLA are referred to in section 12.3 of this Chapter, the aspects of the SDC-HLOR and the SDC-PTR, where applicable to this assessment, are described in the paragraphs below.

12.2.95 The SDC-HLOR divided the District into six character areas, based on the three general character areas (the ‘*Urban Area*’, ‘*Romney Marsh Area*’ and ‘*North Downs*’) identified in the CSR:

- Area 1: Kent Downs
- Area 2: Folkestone and Surrounding Area

- Area 3: Hythe and Surrounding Area
 - Area 4: Sellindge and Surrounding Area
 - Area 5: Romney Marsh and Walland Marsh
 - Area 6: Lydd, New Romney and Dungeness.
- 12.2.96 Each character area was assessed against ten criteria drawn from the spatial planning principles outlined in the NPPF including ‘*statutory and non-statutory designations*’ such as the AONB, ‘*landscape and topography*’; ‘*heritage*’; and ‘*spatial constraints and opportunities*’ (which included the need to avoid settlements coalescing).
- 12.2.97 The consideration of ‘*landscape and topography*’ was informed by the SDC-HLLA- in particular by its study of landscape character, landscape value, susceptibility to change, and sensitivity to change and therefore capacity for change across the district.
- 12.2.98 A range of potential spatial distributions to growth arising from this assessment were then developed and assessed with stakeholders and partner organisations. The study concluded that ‘*Sellindge and surrounding area*’ were the locations which were most free from strategic constraints, and should therefore form the basis for more detailed study in SDC-PTR.
- 12.2.99 The SDC-PTR used site-specific evidence (including the SDC-HLLA) and detailed analysis to define sub-areas (A, B, C & D) within the ‘*Sellindge and surrounding area*’, shown on Image 12-3 and to assess the potential of these to accommodate strategic growth.
- 12.2.100 Topic-based criteria, similar to those used in the SDC-HLOR, were applied in this assessment of each sub-area.
- 12.2.101 The ‘*landscape*’ criteria included: avoidance of visually prominent locations; minimising impact on the AONB and its setting; and identifying locations with the potential for landscape mitigation.
- 12.2.102 The ‘*spatial*’ considerations included: maximising use of existing defensible boundaries to development and opportunities for creating new ones; avoiding “*less sustainable development patterns, such as ribbon development along roads; also taking account of existing development, planning proposals and/or policy support for development*” (section 1.2 page 1-9).
- 12.2.103 The SDC-PTR found that land within Area B and some of Area C was considered to be more suitable for strategic-scale development on the landscape criterion without needing extensive mitigation. Section 2.4 page 2.-48 identified that strategic development within these areas “*would not avoid adverse landscape and visual effects entirely*” but in some areas “*these effects could be more readily mitigated through the siting, type, layout and design of development to assimilate it into the landscape, and limit potential wider landscape and visual effects, allowing for a higher density of development.*”

Image 12-3 Extract from SDC-PTR – Figure 1: Areas A-D, comprising the starting point for Shepway Strategic Growth Options Report: ‘Phase Two Report’

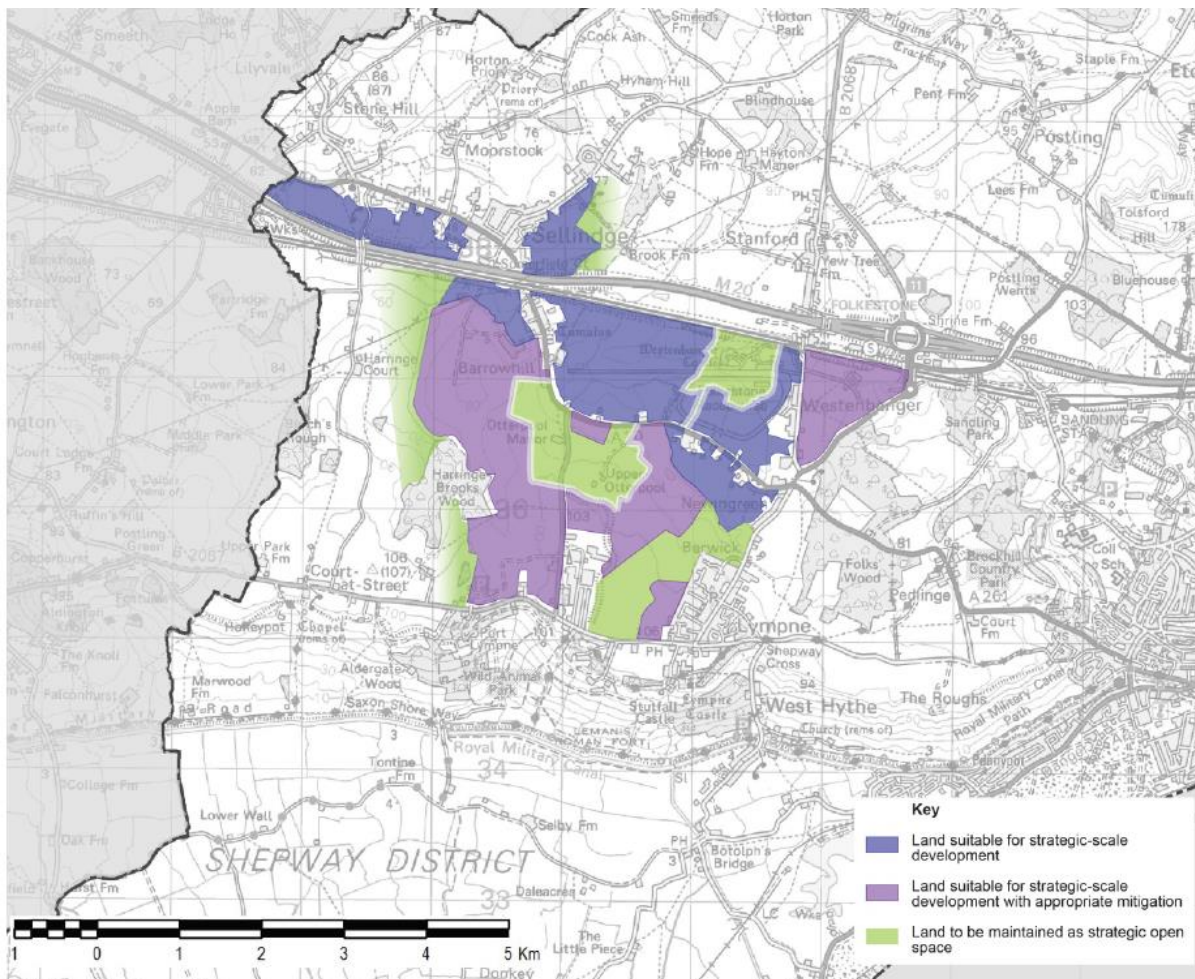


12.2.104 Other areas, such as the “rising land either side of Otterpool Lane between Harringe Brooks Wood, Barrowhill, Lympne and the A20, and the land within the triangle east of Westenhanger.... would only be suitable for strategic-scale development with appropriate mitigation, including a lower, more suburban, density of development, use of suitable local building materials, and extensive landscape softening through tree planting.” The SDC-PTR considers this suitable for development “subject to appropriate mitigation, having regard to the definition of the setting” of the AONB.

12.2.105 With regards to ‘Spatial opportunities and constraints’ it was also found that Area B contained a suitable number and type of ‘defensible boundaries’ (such as roads, tree belts, hedgerows, and watercourses) within which to site strategic scale development, and that there was the ability to maintain the “character of Lympne as a free-standing hilltop village.”

12.2.106 The conclusion of the SDC-PTR (page 3-104) stated that “*simple inter-visibility of land from viewpoints within the AONB [should] not automatically preclude development*” and that rather, suitability should be determined “*based on relative impact of development on AONB setting, opportunities for landscape and visual mitigation.*”

Image 12-4 Extract from SDC-PTR: Figure 51: All land considered suitable for strategic-scale development and strategic open space



ABC development plan Supplementary Planning Guidance

12.2.107 ABC have adopted a number of SPDs to expand upon or add details to policies laid out in their development plan documents. A description of those that are applicable to this assessment, and their particular areas of relevance are set out in the paragraphs below.

12.2.108 ABC produced a *Landscape Character SPD* (Ref 12.22) (ABC-LC SPD) in 2011. As the main purpose of the ABC-LC SPD is to highlight the landscape character of the Borough it is referenced in section 12.3 of this Chapter.

12.2.109 The *ABC Dark Sky SPD* (Ref 12.23) (ABC-DS) was adopted in 2014. Its summary of associated planning policy context, and its design guidance regarding lighting (where it forms part of a planning application) are similar to those found in Policy NE5 of F&HDC-P&PLP, the NPPG and the GNROL. Much like these documents, the ABC-DS SPD states that it is the aim of the Authority “*to balance the need for any lighting proposal against the implications it may have on the environment in terms of obtrusive light.*”

12.2.110 The ABC-DS also discusses, issues regarding ‘dark skies’ and other lighting topics that are specific to ABC. The ABC-DS SPD states that the:

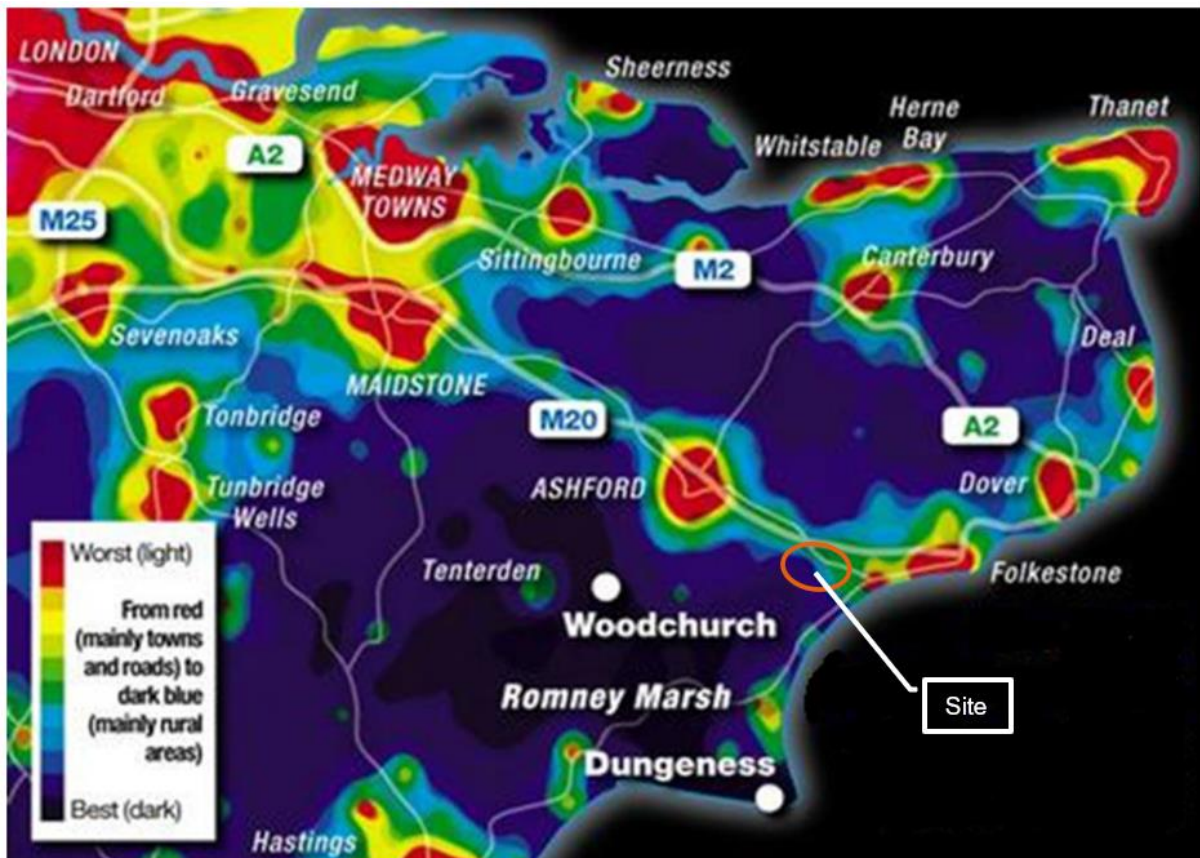
“Council’s rural areas to the south and east of the urban area [of Ashford] currently enjoy some of the darkest skies in the region, unaffected as yet by the effects of external lighting often brought by developmental pressures. The area around Woodchurch in particular, east of Tenterden, has been measured by global satellites as comprising one of the only areas in the Borough with no light detected, and thus is worthy of protection as an ‘intrinsically dark’ sky as alluded to within the NPPF (paragraph 125).” (paragraph 1.4)

12.2.111 Paragraph 4.4.2 confirms that ABC:

“does not yet contain any areas designated ‘Protected’. It is possible that the area of ‘intrinsic darkness’ around Woodchurch can become a designated Dark Sky Protected Zone in the future. At this stage, planning applications within the area of darkest skies will be subject to E1 (AONBs; SSSIs; rural areas outside of settlement confines) or E2 (identified rural settlement confines) controls.”

12.2.112 Image 12-5 shows “how unique is the zone around Woodchurch on a county level”. The location of the site in relation to this has been added.

Image 12-5 Extract from ABC-DS SPD: Plan 1 Showing areas of darkest skies in South East England (courtesy of Ashford Astronomical Society) and the location of the site



Other Guidance

AONB - *Guidance on the Selection and use of Colour in Development*

12.2.113 The AONB Unit published the *Guidance on the Selection and use of Colour in Development (GSCD)* in June 2019 (Ref 12.24).

- 12.2.114 Section 1.2 of the GSCD states that the purpose of the document to provide guidance on the selection and use of colour for building development within the AONB and its setting.
- 12.2.115 Page 32 of the GSCD includes a recommendation for the colours and finishes to use within developments within the setting of the AONB. It states that:
- “with increased distance it becomes difficult to pick out individual colours with any accuracy. What does not change however is tonality, the degree of lightness and darkness. Tonal contrast between an object and its setting is the primary means by which objects can be identified in the landscape. Light tonality of development set against inherently darker landscape will result in very high visibility when viewed from afar. Conversely development with a tonality that matches or is slightly darker than the tonality of the receiving landscape will be hard to pick out from a distance.”*
- 12.2.116 The GSCD recommends therefore that any development within the setting of the AONB should use finishes with a tonality of NCS S 5500N to NCS S 6000N (in accordance with the Natural Colour System) as a minimum to *“ensure integration with the contextual landscape.”*
- 12.2.117 With regards to particular building elements the GSCD states that *“Roof colours in particular can become very dominant unless carefully considered from higher ground....Assessing the major viewpoints within the AONB, all roof materials require a tonality not less than NCS S 5500N-S 6500N, if they are to integrate into the surrounding landscape and therefore minimise their visual impact upon the views.”*
- 12.2.118 It also advocates avoidance of reflective materials with a high gloss finish as these appear *“dramatically lighter and can cause a distracting glare, even if the material in use is dark in origin.”* It recognises that *“matt colours will sit better in a rural context allowing for patterns of light and shade from surrounding vegetation to animate surfaces. Matt finishes are particularly important when considering development affecting sensitive views, especially from above.”*
- 12.2.119 Where large building in a view looks *“too large for its setting, introducing another colour of a dark or recessive nature may help to diminish the apparent scale by breaking up its massing.”*

Consultation and Scoping

Consultation

- 12.2.120 Table 12-3 provides a summary of the consultation undertaken for this chapter prior to and following the submission of the 2019 application (Y19/0257/FH). The table summarises how the comments have been addressed in this chapter, where relevant.

Table 12-3 Summary of consultation

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
<p>16/11/2016 F&HDC: Landscape & Urban Design Officer</p>	<ul style="list-style-type: none"> - applicable existing published landscape character assessments for consideration in the LVIA. 	
<p>16/11/2016 AONB Unit: Director</p>	<ul style="list-style-type: none"> - key landscape and visual receptors; - potential likely landscape-related impacts and opportunities; - relevant landscape related planning policy; 	<ul style="list-style-type: none"> - landscape and visual baseline data collected (see Section 12.3);
<p>07/12/2016 NE: Senior Advisor, Sustainable Development team Sussex & Kent team; Adviser, Sustainable Development Team</p>	<ul style="list-style-type: none"> - applicable cumulative developments; - future engagement with F&HDC, AONB & NE; - the setting of the AONB; - role of NE as the Statutory Consultee regarding the AONB. 	<ul style="list-style-type: none"> - cumulative developments identified and mapped (see Sections 12.2, 12.3 and Figure 12.76);
<p>31/05/2017 F&HDC: Landscape Officer AONB Unit: Planning Manager NE: Senior Advisor, Sustainable Development team Sussex & Kent team</p>	<ul style="list-style-type: none"> - LVIA study area extents; - landscape character and visual receptors with the potential to experience significant effects; - representative VPs; - initial masterplanning work. 	<ul style="list-style-type: none"> - agreed LVIA study area extents (see Section 12.2); - agreed landscape character and visual receptors with the potential to experience significant effects (see Section 12.2); - agreed representative VPs (see Section 12.2); - response to the initial masterplanning work feedback to others within the Masterplanning team (see Section 12.4); - appropriate level of engagement through the process of masterplanning and planning process through on-going dialogue, and involvement in selected pre-application meetings (see Section 12.2).

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
<p>31/05/2017</p> <p>F&HDC: Landscape Officer ABC: Planning Policy Officer</p>	<p>- as meeting on 31/05/2017, plus consideration of ABC’s Dark Skies Protection Area planning policy area.</p>	<p>- consideration of ABC’s Dark Skies Protection Area planning policy area within the LVIA (see Dark Sky Zone in Section 12.3).</p>
<p>17/11/2017</p> <p>F&HDC: Landscape Officer NE: NE: Senior Advisor, Sustainable Development team Sussex & Kent team; Advisor, Sustainable Development team AONB Unit: Planning Manager</p>	<p>- overall character-building design principles.</p>	<p>- ‘in principle’ agreement to overall character-building design principles (see Section 12.4).</p>
<p>31/07/2018</p> <p>F&HDC: Landscape Officer; Planning Case Officer AONB Unit: Planning Manger</p>	<p>- agreement to those VPs from which visualisations would be prepared.</p>	<p>- inclusion of visualisations within LVIA (see ‘Preparation of Visualisation’ in Section 12.2).</p>

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
<p>24/10/2018</p> <p>F&HDC: Landscape Officer; Planning Case Officer</p> <p>NE: NE: Senior Advisor, Sustainable Development team Sussex & Kent team; Green Infrastructure Officer; Geological SSSI Officer</p>	<p>- Discussion upon the green infrastructure proposals and the approach taken to the key open spaces within the proposed Development.</p>	<p>- Advice regarding Green Infrastructure accepted (see GI-Strategy).</p>
<p>Consultations since 2019</p>	<p><i>This mainly includes addressing the following LPA and key consultee comments to the previously submitted Outline Planning Application Otterpool Park (Y19/2057/FH)</i></p>	
<p>Temple Group</p> <p>5th April 2019</p> <p>Interim Review Report (IRR) of ES</p>	<p>Paragraph 11.1.1: TG considered that “<i>there was a good level of consideration of the planning policy context and pre-application consultation with key stakeholders.</i>”</p>	<p>This LVIA adopts the same general planning policy context as the 2019 EIA-LVIA (albeit accommodating any updates since its submission) and relies upon the pre-application correspondence (see Section 12.2 - Planning Policy).</p>
	<p>Paragraph 11.1.2: TG considered that the “<i>scope of the LVIA [2019 EIA-LVIA], including the overall approach to assessment, extents of the study area, temporal scope, sources of information, level of baseline detail and number and location of viewpoint analysis appears appropriate for the scale of the proposed development.</i>”</p>	<p>This LVIA adopts the same overall approach, and general: study area extents; temporal scope, sources of information, level of baseline detail and number and location of VPs as the 2019 EIA-LVIA (albeit updated to reflect the changes to the proposed Development since its submission) (see Section 12.2).</p>
	<p>Paragraph 11.1.2: Clarification sought on exact location of the agreed VPs from which visualisations would be prepared and who they were agreed with at the meeting dated 31st July 2018.</p>	<p>The attendees at the meeting were the F&HDC Project Planning Officer, the F&HDC Landscape & Urban Design Officer, and the Planning Manager of the Kent Downs AONB Unit. The minutes of the meeting are included in ES Appendix 12.4. The five VPs from which the visualisations would be prepared are no’s 2, 3, 4 ,5, 6 as shown on Figure 12.11. We have also added VP no’s 27 and 28 (see ES Appendix 12.4).</p>

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
	<p>Paragraph 11.2.1: the approach taken to landscape character baseline analysis “enables an understanding of the effect of the development on built form and existing landscape context within the study area and provides a suitable level of detail for the assessment of landscape effects”</p>	<p>This LVIA adopts the same level of analysis as the 2019 EIA-LVIA (albeit accommodating any updates to landscape character assessments since its submission) (see Section 12.2 - Landscape Character Baseline).</p>
	<p>Paragraph 11.2.2: all VP photographs should show the technical information required by Guidelines for Landscape & Visual Impact Assessment, Third Edition (GLVIA3) (Ref 12.26).</p>	<p>All VPs (Figures 12.12 – 52) show the correct technical information, such as date and time of photography, AOD of VP, lens focal length and horizontal field of view (see Section 12.2 – Preparation of Visualisations).</p>
	<p>Paragraph 11.2.2: “the quality and scale of the viewpoint images is insufficient to provide a good representation of the existing view - the field of view being too great for a single image to make the viewpoint worthwhile.”</p>	<p>The VP sheets show the 90° field of view from each VP (see ES Appendix 12.3 Viewpoint Sheets).</p>
	<p>Paragraph 11.2.3: “Although the level of description with regard to the visual baseline is sufficient, the reviewer would have preferred to have the inclusion of targeted summaries of the landscape, and particularly the visual baseline. These would have provided the reader with greater clarity of the most sensitive receptors and likely effected receptors, which could have been carried forward to the assessment stage.”</p>	<p>Where considered feasible baseline descriptions in the main body of text will be more targeted, and fuller descriptions have been placed in the appendices (see Section 12.3 – Visual Receptors and ES Appendix 12.2 Assessment Tables).</p>
	<p>Paragraphs 11.3.2 and 11.3.3: consider that the 2019 EIA-LVIA’s methodology was appropriate, and the determination of the sensitivity of landscape character and visual amenity receptors complies with GLVIA3.</p>	<p>This LVIA adopts the same methodology and determination of sensitivity as the as the 2019 EIA-LVIA (albeit accommodating any relevant Landscape Institute (LI) technical guidance notes that have been published since this review) (see Section 12.2 - Methodology).</p>

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
	<p>Paragraph 11.3.4: “...as per GLVIA 3 paragraphs 6.33 and 6.36, and standard industry practice, residents at home are generally considered to be higher susceptibility receptors. ... This should be revisited and if the susceptibility/sensitivity remains unchanged then greater justification of the decision should be provided. The author may find it useful to breakdown the reviewed settlements into smaller areas”</p>	<p>This LVIA has re-considered the susceptibility of ‘residents at home’ and provided more justification of the grading given, as well as providing a finer grain description of the sensitivity of the potentially affected settlements (see Section 12.3 – Visual Receptors and ES Appendix 12.2 Assessment Tables).</p>
	<p>Paragraph 11.3.5: “Sufficient explanation is provided in terms of the assessment of magnitude [of effects] within the body of the assessment and an explanation of the factors that enable the levels of magnitude to be judged is provided within the methodology.”</p>	<p>This LVIA adopts the same methodology and determination of magnitude of change as the as the 2019 EIA-LVIA (albeit accommodating any relevant LI technical guidance notes that have been published since this review) (see Section 12.2 - Methodology).</p>
	<p>Paragraph 11.3.5: The methodology employed to determine the overall level of landscape and/ or visual effects is consistent with GLVIA3</p>	<p>This LVIA adopts the same methodology and judgement of overall effects as the 2019 EIA-LVIA (albeit accommodating any relevant LI technical guidance notes that have been published since this review) (see Section 12.2 - Methodology).</p>
	<p>Paragraph 11.4.5: “...the level of detail provided for embedded mitigation is considered sufficient for an outline planning application.”</p>	<p>This LVIA provides the same level of detail regarding embedded mitigation measures in the 2019 EIA-LVIA (see Section 12.4 – Embedded Design Measures).</p>
	<p>Paragraph 11.5.1: “The cumulative assessment methodology and details of developments to be considered is detailed and appropriate for the scheme.”</p>	<p>This LVIA adopts the same cumulative assessment methodology and descriptions of cumulative developments as the 2019 EIA-LVIA (albeit accommodating any relevant LI technical guidance notes that have been published since this review) (see Section 12.2 - Methodology).</p>
	<p>Paragraph 11.5.3: Evidence of the completed cumulative study is missing from the LVIA.</p>	<p>All aspects of the cumulative study are included within this LVIA (see ES Appendix 12.2 Assessment Tables).</p>
	<p>Paragraph 11.6.1: the author of the review agrees with the stated conclusions of the LVIA.</p>	<p>Noted for consideration during the preparation of this LVIA.</p>

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
	Paragraph 11.7.1: the NTS should “ <i>provide a basic summary of the identified significant effects.</i> ”	A basic summary of the significant effects has been included in the NTS (see the Non-technical Summary)..
Natural England 3rd June 2019 Letter to F&HDC	Under-estimation of the effects on specific VPs within the 2019 EIA-LVIA.	The estimation of effects upon specific VPs has been reassessed in this LVIA (see ES Appendix 12.2 Assessment Tables).
	Inadequate mitigation of adverse landscape and visual effects outlined within the 2019 EIA-LVIA.	The nature and extent of mitigation (particularly in relation to proposed structural planting – some of which would be planted in ‘advance’) outlined in the LVIA has been re-considered (see paragraph 12.4.91 and Figure 12.77).
	The development proposals outlined in CSR policy CSD9 should be included in the cumulative assessment.	The development proposals outlined in CSR policy CSD9 (the Sellindge Strategy) are included within the cumulative assessment (see Section 12.3 Cumulative Developments, and Figure 12.76).
	The effects of a permanent ‘Lorry Holding Area’ solution to ‘Operation Stack’ should be included in the cumulative assessment.	There are no current permanent off-road ‘Lorry Holding Area’ proposals associated with ‘Operation Stack’ that have been put forward by National Highways. Therefore, this would not be included within the cumulative assessment of this LVIA.
	It is unclear how the extant and committed developments were considered cumulatively with the proposed Development within the 2019 EIA-LVIA.	Clearer descriptions of the cumulative assessment will be made within this LVIA (see ES Appendix 12.2 Assessment Tables).
	Concern that the 2019 EIA-LVIA only assessed the visual impact upon receptor groups (i.e. users of the North Downs National Trail) and not upon the receptors at each individual VP.	Para 6.31 of GLVIA3 confirms that it is not the viewpoint themselves that the assessment is upon but the receptor (i.e. the people) at that viewpoint. The effect on the identified receptors at each viewpoint has been carried out (see ES Appendix 12.2 Assessment Tables).

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
	The visualisations produced in the 2019 EIA-LVIA did not clearly illustrate the potential height of the proposed Development.	The methodology employed to produce the visualisations (set out in the LVIA-2019 and also used in this LVIA) accurately depict the potential maximum height of individual proposed Development areas as indicated on Parameter Plan <i>OPM(P)4003 Building Heights</i> . (see Section 12.2 Visualisation Preparation, and ES Appendix 12.2 Assessment Tables).
	The colour used to indicate the extent of the proposed Development within the 2019 EIA-LVIA visualisations needs reconsideration.	The colours used upon the visualisations will reflect the differences in height of the proposed Development areas as indicated on Parameter Plan. <i>OPM(P)4003 Building Heights</i> (see ES Appendix 12.3 Figures).
	The visualisations contained within 2019 EIA-LVIA should include clear identification of key locations to aid the viewer in deciphering parts of the proposed Development and structural planting.	Labels have been added to the visualisations within this LVIA (see ES Appendix 12.3 Figures).
	Additional visualisations should be prepared for VPs 27 and 28.	Additional visualisations have been prepared for VPs 27 and 28 (see ES Appendix 12.3 Figures).
	An additional assessment scenario, to the three contained within the 2019 EIA-LVIA depicting the point 20-30 years after construction should be assessed.	A further assessment scenario (AS4) set 30 years following construction completion has been included in this LVIA as the gap between AS4 and AS3 (15 years) would mirror the same gap as between AS2 and AS3 (also 15 years) (see Section 12.2 Assessment Scenarios, and ES Appendix 12.3 Figures).
11/07/2019 F&HDC Planning Case Officer	Page 9- paragraph 1 – recognition that strategic scale development, such as OP, will “ <i>always give rise to some adverse landscape and visual effects; a new settlement of this scale should always be of the highest standards of design and planning</i> ”	OP is a landscape-led design that uses LVIA as an iterative process to identify adverse effects on landscape character and visual amenity early on, and where possible, amend the design to: firstly, avoid these; secondarily reduce/minimise their impact; or lastly mitigate any residual effect (see Section 12.4 Embedded Design).

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
<p>Post Consultation Planning Report</p>	<p>Page 9- paragraph 2 – <i>“Otterpool Park will be viewed and experienced from a range of static and kinetic perspectives and angles; on foot, cycle, from cars, public transport, as well as important viewpoints.”</i></p>	<p>This range of visual receptors is included with our assessment see Table 12-20.</p>
	<p>Page 9- paragraph 4 – <i>“the methodology and assessment have not been undertaken in accordance with best practice and should be improved to provide a robust and realistic assessment.”</i></p>	<p>The methodology has been endorsed by F&HDC own LVIA specialists (see paragraphs 11.3.2 and 11.3.3 of the Temple Groups Initial Review Report dated 5th April 2019 in rows below) (see Section 12.2 – Methodology and Table 12-4).</p>
	<p>Page 9- paragraph 4 – <i>“the quality and scale of the viewpoint images is insufficient to provide a good representation of the existing view - the field of view being too great for a single image to make the viewpoint worthwhile.”</i></p>	<p>The horizontal field of view (53.5 degrees – planar) displayed in those 2019 EIA-LVIA VP figures that contained visualisations of the proposed Development accords with the LI ‘Visual Representation of Development Proposals Technical Guidance Note 06/19’ (Ref 12.27). This is because it represents, when printed at the intended paper size indicated in the figures, and when held at arm’s length the scale of the landscape in the view from these locations.</p> <p>To accord with the ‘Visual Representation of Development Proposals Technical Guidance Note 06/19’, however, all of the baseline VP photographs are presented in this LVIA with a 90-degree horizontal field of view (see ES Appendix 12.3 Figures).</p>
	<p>Page 9 paragraph 5 – <i>“the optimum density for a site should be determined by a range of factors and a design-led approach rather than a numerical calculation or derived from a single constraint, such as a particular viewpoint or land ownership. In this approach, the appropriate form and scale of new development is established through an iterative design process that takes account of the site context in terms of the surrounding landscape, townscape, proximity and access to services and capacity of supporting existing and planned infrastructure, particularly public transport.”</i></p>	<p>The LVIA process has contributed to the form and scale of the proposed Development (see Section 12.4 – Embedded Design).</p>

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
	<p>Page 9 paragraph – <i>“an overall envelope of development is required at this stage against which ‘reasonable worst case’ environmental impacts need to be fully tested.”</i></p>	<p>The LVIA considers the worst case scenario primarily shaped by proposed Development parameters, but also reasonably informed by the contents of ‘in-support’ documents, such as the Illustrative masterplan, DAS, and GI-Strategy (see Section 12.1 – the Development, Section 12.2 Methodology, Section 12.2 Assumptions, & Section 12.4 Design & Mitigation).</p>
	<p>Page 10 paragraph 1 – <i>“the rationale for the approach to heights should be clearer at this Outline stage, with flexibility for sculpting and shaping of building heights through the detailed design process and controlled through the three tier approach.”</i></p>	<p>The SDP outlines the rationale for placing the taller buildings in the town centre and away from sensitive areas of heritage and landscape (see Section 12.4 of this LVIA).</p> <p>The SDP also describes how variety in the heights of buildings across the proposed Development, and within individual development plots, would help visually create: its legibility as a town; harmony with the local urban and rural character; and differentiation between of townscape character within the overall settlement.</p> <p>These matters are deemed reasonable for consideration in the LVIA .</p>
	<p>Page 10 paragraph 2 – <i>“We view the current location of linear employment space alongside the railway line to be ... visually intrusive from a landscape impact point of view... . We think a reappraisal of the approach to Green Infrastructure alongside the entire length of the railway line is required ...”</i></p>	<p>The Illustrative Masterplan, submitted in support of the application, demonstrates how the majority of the employment space could be restricted to the east of the Castle, and the Open Space & Vegetation Parameter Plan and Development Specification ensure that a significant belt of GI containing new structural vegetation would be created within this (See SDP and Parameter Plans).</p>
	<p>Page 10 paragraph 3 – <i>The landscape importance of the triangular land parcel between Stone Street and the A20 (referred to from this point forward as the ‘Hillhurst triangle’) “is recognised with its inclusion within the locally designated Special Landscape Area (SLA). We agree with AONB Unit in specific respect of the need for an improved GI structure in this area and greater need for a filtering of the view through informal layouts.”</i></p>	<p>A workshop with the LPA and AONB-Unit was held in March 2021 to discuss improved GI provision and structural planting, and subsequent greater informality of parcel shapes. Resultant measures were taken forward into Parameter Plan OPM(P)4002 – <i>Open Space & Vegetation</i>, and the Structural Planting Proposals Plan (Figure 12.77 and Figure 108 of the GI-Strategy).</p>

Consultee/ Contact/Date	Summary of Consultee Issue	Outcome
	Page 10 paragraph 3 – The LPA supports the commissioning of 'Colour in the Landscape work to inform the preparation of a Strategic Design Code.	The ' <i>Kentish Vernacular Study</i> ', submitted in support of the application contains consideration of the colour palette for the proposed Development (see the CKVS).
	Page 10 paragraph 4 – the sloping nature of sections the Hillhurst triangle " <i>are likely to result in a need for the formation of development platforms that could further negatively impact on landscape character.</i> "	The SDP document addresses this matter by defining that street pattern and building form should relate to the topography of the area (see the SDP).
	Page 10 paragraph 4 – The LPA has concerns about the potential realignment of the A20 between Newingreen and junction 11 of the M20, and its re-grading as a dual carriageway given this area's " <i>landscape sensitivities</i> "	Measures to integrate the improvements to this stretch of the A20 into the surrounding landscape have been added to the proposals (see SDP, Parameter Plans & Figure 12.77).
	Page 10 paragraph 4 – The LPA seeks more structural planting at the Hillhurst triangle entrance to the development	Further structural planting proposals have been added to the proposed Development in this area – see Figure 12.77.

Scoping

- 12.2.121 A previous EIA Scoping Opinion was undertaken for the 2019 application, where relevant, the comments from this process have been incorporated within Table 10-3. For this amended application, a request for a Scoping Opinion was submitted to F&HDC in June 2020. This outlined the work that had been undertaken to date and sets out the proposed approach to the EIA. A Scoping Opinion was issued by F&HDC in July 2020. Table 12-4 provides a summary of the scoping opinion comments relevant to this chapter, and how they have been addressed.
- 12.2.122 Additionally, a Scoping Addendum was submitted on 5 October 2021 to outline key changes to the application. These comprised additional land in the north-west corner of the site for provision of the waste water treatment works (WWTW), additional land for highway junction works at Newingreen Junction, minor amendments to clarify land ownership boundaries and a change in the assessment approach in relation to the future uses of Westenhanger Castle. A response was received from F&HDC on this Scoping Addendum as set out in Chapter 2: EIA Approach and Methodology. All relevant changes since the submission of the scoping report have been assessed in this ES.
- 12.2.123 Temple, on behalf of F&HDC, undertook a review of the Draft ES in December 2021. There were no topic specific comments relating to this chapter.

Table 12-4 Summary of EIA Scoping Opinion

Consultee/ Contact	Summary Scoping Opinion Response	Location in the ES
<p>29th July 2020</p> <p>Temple Group (on behalf of F&HDC)</p> <p>Scoping Opinion Report</p>	<p>Paragraph 5.9.4: <i>“The representative viewpoints should be revised in light of the inclusion of Westenhanger Castle within the site boundary. These viewpoints should be confirmed with F&HDC.”</i></p>	<p>The ZTV has been updated and the range of VPs (see Figure 12.11) was agreed with F&HDC (email dated 19th October 2020)</p>
	<p>Paragraph 5.9.6: <i>“Section 12.3.10 notes that major effects are considered significant and that professional judgement will be used to determine whether moderate effects are considered significant. However, it is usual that moderate effects are also considered significant.”</i></p>	<p>This aspect of the LVIA methodology was applied to the 2019 EIA-LVIA and was considered at the time acceptable to F&HDC, stakeholder and the Temple Group in their review dated 5th April 2019. In addition, GLVIA3 and its associated technical guidance and information notes do not prescribe that moderate effects are significant. They do prescribe however that professional judgement is used to determine whether an effect is significant or not.</p> <p>The same methodology has been used in this LVIA (see Section 12.2 - Methodology).</p>
	<p>Paragraph 5.9.7: <i>“Viewpoint locations will be revisited as part of the establishment of baseline conditions. Photography used to support the Landscape and Visual Impact Assessment (LVIA) should be sufficiently recent.”</i></p>	<p>VP locations (see Figure 12.11) have been revisited in preparation for this LVIA and photography from each was captured in 2021.</p>
	<p>Paragraph 5.9.8: <i>“The assessment should consider the visual impact of any enabling infrastructure for the proposed Development, including any above-ground water or sewer mains, as well as highways access works, if visible.”</i></p>	<p>The assessment considers known planned above ground infrastructure including works to existing highways, creation of new highways, and the creation of a wastewater treatment plant (see Section 12.1 – The Development).</p>
	<p>Paragraph 5.8.9: <i>“The proposed hierarchy of mitigation measures is considered acceptable, although few examples of mitigation measures are provided.”</i></p>	<p>A list of all of the mitigation measures that have been considered within the LVIA is set out in Section 12.4.</p>

Consultee/ Contact	Summary Scoping Opinion Response	Location in the ES
	<p>Paragraph 5.9.10: <i>“The cumulative assessment would include any developments of sufficient scale and massing to have a potential for cumulative effects. Proximity and overlapping of Zones of Theoretical Visibility are other key determinants in whether a development should be considered a cumulative scheme.”</i></p>	<p>The cumulative assessment includes those developments which are of a sufficient scale and massing to bring about potential for cumulative effects. The ZTV’s of such developments, where available, have been used in the cumulative assessment (see Section 12.2 - Methodology).</p>
<p>19/10/2020 F&HDC Planning Case Officer, James Farrar Email correspondence regarding LVIA-related matters arising from the EIA Scoping Opinion</p>	<p>1) Agreement of the VPs for inclusion within the LVIA: <i>“As viewpoints were previously agreed and the new ZTV is very similar to the submitted, it appears reasonable to retain the same viewpoints – the only reason I can see to include more viewpoints would be if new and potentially sensitive receptors had arisen as result of the changes.”</i></p> <p>2) Agreement of the LVIA visualisation type and locations: a) <i>“Visualisations produced in accordance with the Landscape Institute’s TGN06/19 Type 1 visualisations would be appropriate for baseline photographic images.”</i></p> <p>b) present wide views as cylindrical panoramas of up to 90° horizontal field of view (HFoV) at A1 width with an image size of 820mm x 250mm.</p>	<p>This LVIA retains the same VPs at the 2019 EIA-LVIA (see Figure 12.11).</p> <p>The inclusion of Westenhanger Castle within the new OPA boundary has not meant any further VPs are necessary as VP21 (see Figure 12.11) is already located on the PRoW closest to the Castle, with views to it.</p> <p>The inclusion of the waste water treatment works (WWTW) within the OPA boundary has not meant any further VPs are necessary as VPs 14 and 15 (see Figure 12.11) are already located on the PRoWs closest to it.</p> <p>Baseline photographic images are prepared in accordance with the LI TGN06/19 Type 1 (see Section 12.2 – Methodology & ES Appendix 12.3 Figures).</p> <p>Wide views are presented as cylindrical panoramas of up to 90° HFoV at A1 width with an image size of 820mm x 250mm (see ES Appendix 12.3 Figures).</p>

Consultee/ Contact	Summary Scoping Opinion Response	Location in the ES
	<p>c) <i>“We would expect any photomontage to be produced to Type 4 specification even if at this stage the detail of building materiality is not decided. Type 4 visualisations provide accurate views to be developed which can be relied upon in the decision making process.”</i></p>	<p>The preparation of the LVIA visualisations has applied the same degree of accuracy and technical approach as necessary for Type 4 visualisations apart from the use of ‘high resolution commercial data’ such as those listed in Table 2 of the Visual Representation of Development Proposals LI TGN 06/19, as this information has not consistently available across the study area throughout the LVIA process. This aspect of the visualisations’ methodology (set out in paragraph 12.2.215) is the same applied within the 2019 EIA-LVIA, upon which no criticism was made.</p>
	<p>3) Inconsistency between the Temple Group’s endorsement of the LVIA methodology:</p> <p><i>“It is pretty standard for effects that are assessed as moderate or above to be considered significant, though there are no hard-and-fast rules in GLVIA3. The use of professional judgement is usually a matter for judgements of levels of sensitivity/magnitude with significance derived from the combination of these factors. That is, once a final level of effect has been assigned, it is usually then considered on a direct threshold basis i.e. moderate or above generally considered significant.”</i></p>	<p>GLVIA3 and its associated technical guidance and information notes do not prescribe that moderate effects are significant.</p> <p>The complexity of the site and proposed Development requires that the determination of effect significance should involve professional judgement rather than just reliance upon application of a matrix combining sensitivity and magnitude – so long at the methodology is clearly explained.</p> <p>The use of professional judgement to determine whether or not an effect of moderate significance was applied to the 2019 EIA-LVIA and was considered at the time acceptable to F&HDC, stakeholders and the Temple Group in paragraph 11.3.5 of their ‘Interim Review Report’ dated 5th April 2019.</p> <p>The same methodology has been used in this LVIA (see Section 12.2 – Methodology).</p>

Consultee/ Contact	Summary Scoping Opinion Response	Location in the ES
	<p>4) Issues with the LVIA Methodology and Potential underestimation of effects:</p> <p><i>“The levels of sensitivity assigned to residential properties in the 2019 ES were lower than would be expected – the sensitivity of residents from principal rooms of the property (and its curtilage) are universally considered high. ... We would recommend a higher sensitivity be allocated to residential receptors.”</i></p> <p>5) Confirmation of assessment scenarios for inclusion within the LVIA:</p> <p><i>“A scenario at year 30 (as requested by Natural England) is reasonable considering the scale of the scheme – in addition to construction (including phasing), operational and operational with established landscaping (year 15) effects.”</i></p>	<p>The LVIA has reconsidered the sensitivity of residential receptors (see ES Appendix 12.2) and heightened these where applicable. Narrative to describe their sensitivity has been provided (see ES Appendix 12.2 Assessment Tables).</p> <p>An assessment scenario (AS4) at 30 years following construction completion has been included in this LVIA (see Section 12.2 – Assessment Scenarios).</p>

The Study Area

- 12.2.124 The study area, in which the likelihood of significant effects on landscape character and visual amenity is possible, is shown on Figure 12.1. This was established through the preparation of a ZTV for the proposed Development, fieldwork to ground truth its findings, a consideration of its inter-visibility with other committed developments that are likely to be included within the cumulative impact assessment, and discussions with stakeholders including F&HDC, ABC, NE and the AONB Unit.
- 12.2.125 It was agreed, that beyond the 10km area shown in Figure 12.1 the proposed Development, taking into consideration anticipated building heights, would not result in significant effects on landscape character and visual amenity, as beyond this distance the proposed Development would be difficult to visually discern.
- 12.2.126 As such, the ZTV shown on Figure 12.10 is an identification of the area within which the proposed Development may be visible considering the screen effect of existing topography and intervening buildings and key areas of vegetation. The terrain model is derived from LiDAR elevation data at 1m resolution supplemented with OS 5 Terrain data. buildings and the woodland taken from the Ordnance Survey OS Open Map Local ESRI® Shapefile. The buildings have been given a height of 8m and the woodland has been given a mean average height of 10m.
- 12.2.127 A 25m x 25m grid was placed over the building heights of the proposed Development, as indicated on parameter plan *OPM(P)4003 – Building Heights*, and the heights of proposed built form at the intersections of these was then used. No change was recorded where the grid intersections fall within areas of proposed open space. The calculation was then made as to where the proposed Development would be visible from a viewing height of 2.0m above ground level.
- 12.2.128 It must be noted that the actual visibility on the ground would be noticeably less than indicated by the ZTV as it cannot reflect the obstructing influence of non-woodland vegetation (tree belts, hedgerows, shelter belts, domestic vegetation). Additionally, the ZTV does not reflect the extent to which visibility reduces with distance from the proposed Development.
- 12.2.129 Further field survey work to ground truth these findings has been carried out over numerous visits under differing weather conditions, and times of day between summer 2016 and summer 2021 and included visits to: the site; known public vantage/viewpoints in the study area; and designated landscapes, and has involved travel around the study area and across a wider area to consider potential effects on landscape character and visual amenity.

Methodology for Establishing Baseline Conditions

- 12.2.130 The methodology for this assessment follows the guidance set out in GLVIA3 and the number of statements of clarification to this have been issued by the Landscape Institute (LI) regarding this (Ref 12.28).
- 12.2.131 The guidance provided by GLVIA3 is not prescriptive but seeks instead to establish certain principles that would help to achieve a degree of consistency with regard to the production of LVIA's.
- 12.2.132 The key steps in the methodology for assessing landscape and visual effects has been as follows:
- Baseline: this involved the gathering of documented information; site visits and initial reports to client of issues that may need to be addressed within the design, and included:

- determining the area over which the proposed Development will be visible through creation of a preliminary ZTV;
 - analysing the existing landscape character baseline of the study area, the overall landscape resource, and identifying landscape character receptors that are the components of this; and
 - recording the visual baseline in terms of the different groups of people who may experience views of the proposed Development (the visual receptors) and the nature of their existing views and visual amenity.
- Involvement with the preparation of the proposed Development: The LVIA has been part of an iterative process whereby the landscape architect has been able to highlight likely adverse effects to the designers and so secure embedded design, mitigation and enhancement measures.
 - Assessment: involved an assessment of the landscape and visual effects of the proposed Development, requiring site-based work and the completion of a full report and supporting graphics, including:
 - selecting VPs in consultation with F&HDC, ABC, NE and AONB Unit, to be representative of these visual receptors, and collecting photograph from them in both winter (the worst-case) and summer months;
 - the likely significance of effects on the landscape character and visual receptors (using a worst-case scenario of winter views), were identified with reference to the sensitivity of the receptor (its susceptibility and value) and magnitude of change (a combination of the scale of impact, geographical extent and duration/reversibility); and
 - determining whether the effects were ‘significant’ or ‘not significant’.

Forecasting the Future Baseline

12.2.133 The baseline described in this assessment is that which currently exists on the site and in its surrounds at the present time. It is acknowledged, however, that given the length of time which would elapse before the proposed Development is completed, the baseline conditions of these areas may change during that period, irrespective of the proposed Development occurring. As such, a future baseline for each of the points in time that the proposed Development has been assessed upon has also been forecast. The points in time that this assessment addresses are:

- Current baseline (2021);
- Future baseline (2023) – predicted start of construction;
- Peak building year (2030) - approximately 2,500 houses, one secondary school and two-three primary schools built.
- Year of completion (2042);
- 15 years following completion, when structural planting implemented as part of the proposed Development is anticipated to have established (2057); and
- 30 years following completion, when structural planting implemented as part of the proposed Development is anticipated to have further established (2072).

Defining the Sensitivity of the Resource

The Landscape Character Resource

12.2.134 Given that this assessment forms part of an application for outline planning, and that, should permission be granted, further detailed ‘reserved matter’ applications (potentially requiring additional LVIA) would be necessary, this assessment considers the effects to the overall landscape resource in terms of effects upon LCAs only.

12.2.135 Landscape assessments of the effects on the finer grained physical landscape fabric of individual site development plots and their surrounds (i.e. individual hedgerows, trees, fieldscapes) would, if necessary, feature in the LVIA’s of the future ‘reserved matter’ applications. Such assessments would be informed by further site analysis and masterplanning, and by the preparation of phase-specific Design Codes as set out in Section 2.0 of the OP-DS.

Nature of Landscape Receptors (Sensitivity)

12.2.136 GLVIA3 (paragraph 3.26) states that the sensitivity of the landscape character resource, and the receptors identified to be representative of this, should be determined by consideration of the ‘susceptibility’ of the receptor (to the change proposed) with the receptor’s relative ‘value’, i.e.:

$$\text{Landscape Sensitivity} = \text{Landscape Susceptibility} + \text{Landscape Value}$$

Landscape Receptor Susceptibility

12.2.137 ‘Susceptibility’ is defined in GLVIA3 (paragraph 5.40) as “the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed Development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies.”

12.2.138 Reasoned professional judgements on the ‘susceptibility’ of landscape receptors are recorded as ‘high’, ‘moderate’ or ‘low’, as set out in indicative definitions within Table 12-5.

Table 12-5 Susceptibility of Landscape Receptors

Susceptibility (indicative)	Description
High	The landscape receptor is less able to accommodate the proposed Development without undue negative consequences to the baseline situation. Attributes that make up the character of the landscape offer limited opportunities for accommodating the change without key characteristics being fundamentally altered, leading to a different landscape character.
Moderate	The landscape receptor is partly able to accommodate the proposed Development without undue negative consequences to the baseline situation. Attributes that make up the character of the landscape offer some opportunities for accommodating the change without key characteristics being fundamentally altered.
Low	The landscape receptor is more able to accommodate the proposed Development without undue negative consequences to the baseline situation. Attributes that make up the character of the landscape are resilient to being changed by the proposed Development.

12.2.139 The ‘*susceptibility*’ that is determined is not absolute and relates to the type of change that is proposed. As a particular landscape receptor may exhibit differing levels of ‘*susceptibility*’ a narrative commentary is provided, to describe and justify the indicative grading levels ascribed to that or the intermediate grading between them. Where intermediate ratings are given, e.g. ‘Low/Moderate’, this indicates a grading that is both less than ‘Moderate’ and more than ‘Low’, rather than one which varies across the range. In such cases, the rating given first means that the impact is closer to that rating.

Landscape Receptor Value

12.2.140 In contrast to ‘*susceptibility*’, the categorisation of landscape ‘*value*’ of a landscape receptor relates purely to its existing baseline, and as such is independent of any development proposal.

12.2.141 ‘Value’ is defined in the GLVIA3 (paragraph 5.19) as “...*the relative value that is attached to different landscapes by society, bearing in mind that a landscape may be valued by different stakeholders for a whole variety of reasons...*”

12.2.142 It goes on to state that “*A review of existing landscape designations is usually the starting point in understanding landscape value, but the value attached to undesignated landscapes also needs to be carefully considered and individual elements of the landscape- such as trees, buildings or hedgerows -may also have value. All need to be considered where relevant.*”

12.2.143 Paragraph 5.20 of GLVIA3 indicates information which might contribute to landscape value and includes:

- information about areas recognised by statute such as Areas of Outstanding Natural Beauty;
- local planning documents for local landscape designations;
- information on features such as Conservation Areas, listed buildings, historic or cultural sites;
- art and literature, identifying value attached to particular areas or views;
- material on landscapes of local or community interest, such as local green spaces, village greens or allotments; and
- any evidence that indicates whether the landscape has particular value to people that would suggest that it is of greater than community value.

12.2.144 The issue of value is also further outlined, in greater detail, in the LI publication ‘*Assessing Landscape Value Outside National Designations - Technical Guidance Note 02/21*’ (Ref 12.29).

12.2.145 Taking both of these documents into account the relative landscape value of each landscape receptor has been determined using the eight criteria identified within paragraph Box 5.1 of GLVIA 3. The value of each criterion has been graded as ‘*High*’, ‘*Moderate*’ or ‘*Low*’. The criteria and value grades are described in turn below. These also accord to the methodology set out within the SDC-HLLA.

12.2.146 Landscape quality / condition is described in GLVIA3 as: Described in GLVIA3 as: “*A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements.*”

- High: landscape is in good condition with intact elements that are well-managed.

- Moderate: landscape is in fair condition with some intact elements and signs of good management practices.
 - Low: landscape is in poor condition with few intact elements and limited signs of management.
- 12.2.147 Scenic quality is described in GLVIA3 as: “*The term used to describe landscapes that appeal primarily to the senses (primarily, but not wholly the visual senses).*”
- High: landscape is of high scenic quality, usually recognised in some form of landscape designation (local or national).
 - Moderate: landscape is of moderate scenic quality.
 - Low: landscape is of a low scenic quality.
- 12.2.148 Rarity of particular elements/features is described in GLVIA3 as: “*The presence of rare elements or features in the landscape or the presence of a rare character type.*”
- High – landscape has several rare elements or is of a rare character type.
 - Moderate – landscape has a few rare elements or characteristic.
 - Low – landscape has no rare elements or characteristics.
- 12.2.149 Representativeness is described in GLVIA3 as: “*Whether the landscape contains a particular character and/or features or elements which are considered particularly important examples.*”
- High: landscape which displays most of the characteristics of its corresponding LCA.
 - Moderate: landscape which displays some of the characteristics of its corresponding LCA.
 - Low: landscape which displays few or none of the characteristics of its corresponding LCA.
- 12.2.150 Conservation interest is described in GLVIA3 as: “*The presence of features of wildlife, earth science or archaeological or historical and cultural interest can add to the value of the landscape as well as having value in their own right.*”
- High: landscape has several different conservation interests, often of national or international importance.
 - Moderate: landscape has some conservation interests, often of regional or local importance.
 - Low: landscape has few or no conservation interests.
- 12.2.151 Recreation value is described in GLVIA3 as: “*Evidence that the landscape is valued for recreational activity where experience of the landscape is important.*”
- High: landscape is highly valued for recreation, likely to have many public rights of way and potentially including some national trails or national cycle routes and/or a well-used destination public open space.
 - Moderate: landscape is locally valued for recreation, likely to have public rights of way, and local or neighbourhood public open spaces.
 - Low: landscape is not greatly valued for recreation and is likely to be lacking in public rights of way or public open space.
- 12.2.152 Perceptual aspects are described in GLVIA3 as: “*A landscape may be valued for its perceptual qualities, notably wildness and/or tranquillity.*”

- High: landscape is aesthetically pleasing, devoid of human influence, tranquil and/or remote and has a strong sense of place.
- Moderate: landscape has a sense of being aesthetically pleasing, devoid of human influence, tranquil and/or remote and has a sense of place.
- Low: landscape has very few positive perceptual qualities and lacks a sense of place.

12.2.153 Cultural associations- described in GLVIA3 as: “*Some landscapes are associated with particular people, such as artists or writers, or events in history that contribute to perceptions of the natural beauty of the area.*”

- High: landscape has strong associations with people, literature or historic events that link directly with the characteristics and landscape elements/features of the area (e.g. The Bronte sisters with the Yorkshire Moors).
- Moderate: landscape has associations with people, literature or historic events that link with the characteristics and landscape elements of the area but do not necessarily rely solely on them (e.g. H.G. Wells with Sandgate).
- Low: landscape has no associations that link with the characteristics and landscape elements/features of the area.

12.2.154 Based upon the consideration of each criterion set out above, a reasoned professional judgement is made as to what the relative overall ‘*value*’ of each landscape receptor is: ‘*High*’, ‘*Moderate*’ or ‘*Low*’ or, where necessary, intermediate grades between these. Where intermediate ratings are given, e.g. ‘*Low/Moderate*’, this indicates a grading that is both less than ‘*Moderate*’ and more than ‘*Low*’, rather than one which varies across the range. In such cases, the rating given first means that the impact is closer to that rating. As a particular landscape receptor may exhibit differing levels of ‘*value*’ a narrative commentary is provided to describe and justify the indicative grading level ascribed to that.

Overall Landscape Receptor Sensitivity

12.2.155 The values for ‘*susceptibility*’ and ‘*value*’ are then considered together, by use of reasoned professional judgement, to derive an overall ‘*sensitivity*’ for each receptor – graded as per the criteria set out in Table 12-6 below.

12.2.156 The ‘*sensitivity*’ that is determined is not absolute and relates to the type of change that is proposed. As a particular landscape receptor may exhibit differing levels of ‘*sensitivity*’ a narrative commentary is provided, to describe and justify the indicative grading levels ascribed to that or the intermediate grading between them. Where intermediate ratings are given, e.g. ‘*Low/Moderate*’, this indicates a grading that is both less than ‘*Moderate*’ and more than ‘*Low*’, rather than one which varies across the range. In such cases, the rating given first means that the impact is closer to that rating.

Table 12-6 Sensitivity of Landscape Receptors

		Value of the Landscape Receptor (indicative)		
		High	Moderate	Low
Susceptibility to Change	High	High	Moderate/High	Moderate
	Moderate	Moderate/High	Moderate	Moderate/Low
	Low	Moderate	Moderate/Low	Low

The Visual Resource

12.2.157 This assessment is concerned with the potential effects that may occur to the visual amenity of specific groups of people (the receptors) within the study area as a result of the proposed Development. This includes groups such as residents, those in their place of work, those traveling through the study area, and recreational users of publicly accessible areas etc. The assessment of effects on settlements focuses on the visual amenity of users of public spaces and streets, though views from groups of dwellings will also be noted in the descriptions.

12.2.158 The visual assessment determines the significance of change in visual amenity experienced by consideration of the nature of the visual receptors (sensitivity) and the nature of the impact (magnitude of change) upon them.

12.2.159 The method of determining visual effects is ostensibly the same as for landscape effects. The nature of the receptor affected is identified, as is the nature of the impact that would occur. These can then be considered together to identify the significance of effect.

12.2.160 A key part of the visual assessment is the assessment of effects from predetermined VPs, which reflects views of the proposed Development that would be experienced by different receptors.

12.2.161 It should be reiterated that the VP itself is not the receptor; rather it is the people that would be experiencing the view from the VP. These people will generally have different responses to a change in view depending upon their location, the activity they are following and other factors, including the weather and time of day/year.

12.2.162 VPs fall into three categories, as set out in the GLVIA3:

- representative VPs (which represent the experience of different types of receptors in the vicinity);
- specific VPs (a particular view, for example a well-known beauty spot);
- illustrative VPs (which illustrate a particular effect/issue, which may include limited/lack of visibility).

Nature of Visual Receptors (Sensitivity)

12.2.163 GLVIA3 states that the nature of visual amenity receptors, commonly referred to as their sensitivity, should be assessed in terms of the combination of the susceptibility of the receptor (to the type of change proposed) with the value attached to the receptor.

$$\text{Visual Amenity Sensitivity} = \text{Visual Amenity Susceptibility} + \text{Visual Amenity Value}$$

Visual Receptor Susceptibility

12.2.164 As described in GLVIA3, the susceptibility of visual receptors to changes in visual amenity is a function of the “occupation or activity of people experiencing the view” and “the extent to which their attention is focussed on the views and visual amenity the experience at particular locations.” Drawn from the guidance within GLVIA3 this is recorded as ‘high’, ‘moderate’ or ‘low’ according to Table 12-7 or, where necessary, intermediate grades between these. Where intermediate ratings are given, e.g. ‘Low/Moderate’, this indicates a grading that is both less than ‘Moderate’ and more than ‘Low’, rather than one which varies across the range. In such cases, the rating given first means that the impact is closer to that rating. As a particular landscape receptor may exhibit differing levels of ‘susceptibility’ a narrative commentary is provided to describe the reasoned professional judgement used to justify the indicative grading level ascribed to that.

Table 12-7 Susceptibility of Visual Receptors

Susceptibility (indicative)	Description
High	<p>People engaged in outdoor recreation, whose attention/interest is likely to be focused on the landscape or particular views, including from public rights of way;</p> <p>Visitors to heritage assets or other attractions, where views of the surroundings are an important contributor to the experience;</p> <p>Communities where views contribute greatly to the landscape/townscape setting enjoyed by residents.</p>
Moderate	<p>People engaged in outdoor recreation, whose attention/interest is not directly linked to the landscape or particular views, and who are not upon public rights of way.</p> <p>Communities where views contribute moderately to the landscape/townscape setting enjoyed by residents;</p> <p>Travellers on road, rail, or other transport routes.</p>
Low	<p>People engaged in outdoor sport/recreation which does not involve or depend upon appreciation of views of the landscape;</p> <p>Communities where views contribute little to the landscape/townscape setting enjoyed by residents;</p> <p>People at their place of work whose attention may be focused on their work/activity and not their surroundings.</p>

Visual Receptor Value

12.2.165 GLVIA3 (paragraph 6.3.7) suggests that when considering the value of a view experienced, that account should be taken of recognition of the:

- *“Value attached to particular views, for example in relation to heritage assets, or through planning designations.*
- *Indicators of the value attached to views by visitors, for example through appearances in guidebooks or on tourist maps, provision for their enjoyment (such as parking places, sign boards and interpretative material) and references to them in literature or art”*

12.2.166 Drawn from the guidance within GLVIA3 this is recorded as ‘high’, ‘medium’ or ‘low’ according to Table 12-8. The ‘sensitivity’ that is determined is not absolute and

relates to the type of change that is proposed. As a particular landscape receptor may exhibit differing levels of ‘value’ a narrative commentary is provided, to describe the professional judgement used to justify the indicative grading levels ascribed to that or the intermediate grading between them. Where intermediate ratings are given, e.g. ‘Low/Moderate’, this indicates a grading that is both less than ‘Moderate’ and more than ‘Low’, rather than one which varies across the range. In such cases, the rating given first means that the impact is closer to that rating.

Table 12-8 Value of Visual Receptors

Value (indicative)	Description
High	Views experienced by receptors are widely-known, well frequented and/or promoted as a beauty spot/visitor destination. The cultural associations of the visual experience are recognised in art, literature or other media. The view relates to the experience of other features, for example heritage assets.
Moderate	Views experienced by receptors, whilst they may be valued locally, are not widely-known. The views experienced have no strong cultural association.
Low	Views experienced by receptors have little/no recognised value. The public are unlikely to visit to experience the views available.

Overall Visual Receptor Sensitivity

12.2.167 The values for ‘susceptibility’ and ‘value’ are then considered together, by use of reasoned professional judgement, to derive an overall sensitivity for each receptor – graded as per the criteria set out in Table 12-9 below.

12.2.168 The ‘sensitivity’ that is determined is not absolute and relates to the type of change that is proposed. As a particular landscape receptor may exhibit differing levels of ‘sensitivity’ a narrative commentary is provided, to describe and justify the indicative grading levels ascribed to that or the intermediate grading between them. Where intermediate ratings are given, e.g. ‘Low/Moderate’, this indicates a grading that is both less than ‘Moderate’ and more than ‘Low’, rather than one which varies across the range. In such cases, the rating given first means that the impact is closer to that rating.

Table 12-9 Sensitivity of Visual Receptors

		Value of the Visual Receptor (indicative)		
		High	Moderate	Low
Susceptibility to Change	High	High	Moderate/High	Moderate
	Moderate	Moderate/High	Moderate	Moderate/Low
	Low	Moderate	Moderate/Low	Low

Methodology for Assessing Impacts and Effects

Methodology for Assessing Landscape Effects

Landscape Impact Characterisation

12.2.169 The impact characterisation, or as it is referred to in GLVIA3 - the 'magnitude of change', on each landscape receptor is reported in terms of the combination of its 'size and scale', 'geographical extent', 'duration and reversibility'. The indicative grading for each is described below:

- **Scale:** For landscape receptors, the size/scale of change depends on the degree to which their key characteristics are altered, removed, or added to.
 - *Large:* Very obvious/intensive change to the balance of existing valued landscape characteristics, with a resulting change in overall character.
 - *Medium:* Obvious change to some of the key valued characteristics, but overall character does not fundamentally change.
 - *Small:* Unremarkable change to key valued characteristics; and/or little/no change upon the overall character.
- **Geographic Extent:** The geographical extent over which the landscape impact will be felt is described as being:
 - *Large:* the majority of the landscape receptor experiences notable change.
 - *Moderate:* a moderate degree of the landscape receptor experiences notable change.
 - *Small:* little-to-none of the landscape receptor experiences notable change.
- **Duration and Reversibility:** The duration relates to the length of time for which the visual change would be experienced:
 - *Permanent* – the change is expected to be permanent and there is no intention for it to be reversed.
 - *Long-term* – the change is expected to be in place for 10-30 years and will be reversed, fully mitigated or no longer occurring beyond that timeframe.
 - *Medium-term* – the change is expected to be in place for 5-10 years and will be reversed, fully mitigated or no longer occurring beyond that timeframe.
 - *Short-term* – the change is expected to be in place for 0-5 years and will be reversed, fully mitigated or no longer occurring beyond that timeframe.

12.2.170 Most changes will be long-term or permanent; however medium or short-term changes may be identified where mitigation planting is proposed or local factors will result in a reduced duration of change (for example where maturing woodland will screen views in future).

12.2.171 The three factors of 'scale', 'geographic extent' and 'duration and reversibility' are then considered together to derive an overall magnitude of change for each receptor - based on the indicative grading set out in Table 12-10, based on from the guidance within GLVIA3. The reasoned professional judgement considers the distribution of grading for each criterion to make an informed assessment of the overall level of each change.

Table 12-10 Magnitude of Change upon Landscape Receptors

Magnitude of Change (indicative)	Description
Very Large	A fundamental change, often long-term and irreversible, in the make-up and balance of all of the receptor's key landscape components, characteristics, and perceptual and aesthetic qualities over its entire geographic area – insofar that a totally new character for the area is composed, after taking into account the proposed embedded design, mitigation and enhancement measures.
Large	An obvious change, often medium to long-term and mostly irreversible, in the make-up and balance of the majority of the receptor's key landscape components, characteristics, and perceptual and aesthetic qualities over an extensive proportion of its geographic area, – insofar that the integral character of the area is compromised, after taking into account the proposed embedded design, mitigation and enhancement measures.
Moderate	A change, sometimes medium-term and partially reversible, in the make-up and balance of some of the receptor's key landscape components, characteristics, and perceptual and aesthetic qualities, which, whilst notable, does not alter the overall form of these, across a moderate degree of its geographic area, after taking into account the proposed embedded design, mitigation and enhancement measures.
Small	A change, sometimes short to medium-term and reversible, to a few of the receptor's key landscape components, characteristics, and perceptual and aesthetic qualities, over a small proportion of its geographic area, after taking into account the proposed embedded design, mitigation and enhancement measures.
Very Small	A small change, sometimes short-term and fully reversible, in a few of the receptor's key landscape components, characteristics, and perceptual and aesthetic qualities, over a very small proportion of its geographic area, after taking into account the proposed embedded design, mitigation and enhancement measures
None	No perceptible change to the receptor's key landscape components, characteristics, and perceptual and aesthetic qualities, after taking into account the proposed embedded design, mitigation and enhancement measures

12.2.172 The criteria levels outlined in the tables above are indicative only. In all cases, a narrative commentary is provided as part of this assessment, to describe and justify the criteria levels ascribed to each receptor. In line with the GLVIA3 no numerical or formal weighting system was not applied. Where variations between relevant criteria occur, reasoned professional judgement is applied and described in the assessment to determine the magnitude of change.

Direction of Landscape Effects

12.2.173 The direction of landscape effects is judged to be positive (beneficial) and/or negative (adverse) or neutral in their consequences for the receptor's key landscape components, characteristics, and perceptual and aesthetic qualities.

12.2.174 The determination of the direction of effect on a landscape receptor is related to the baseline situation and what is considered to be by that receptor, on balance, either a desirable or an undesirable change. As this can vary from person to person, professional judgement has (of necessity) been applied to consider such a subjective matter. As noted in GLVIA3 (paragraph 2.15) this is a "*particularly challenging*" aspect

of the LVIA process, particularly in the context of a changing landscape and sustainable development.

12.2.175 As there are likely to be both positive and negative impacts identified upon a receptor the assessment has sought to both list these and make a reasoned professional judgement upon the overall balance between them to determine the overriding direction of effect. For example, a current detracting feature within the landscape may be removed by the development of new built form that is more appropriate to the character of the area, but more extensive. This would therefore have both beneficial and adverse effects. The assessment seeks to identify the resultant direction, positive or negative, after weighing both aspects up. Should they be equal in weight a 'neutral' direction of effect is recorded.

12.2.176 This decision is entirely separate to the decision regarding the significance of effect. For example, a rating of 'major' and 'adverse' would indicate an effect that was of great significance and on balance negative, but not necessarily that the proposals would be majorly negative. As such the narrative text within this assessment that accompanies any judgement on the effect of the development upon a particular receptor must be also read and understood.

Assessing Significance of Landscape Effects

12.2.177 The significance of an effect, whether adverse or beneficial, will be assessed by comparing the sensitivity of the receptor relative to the magnitude of change, and by considering the indicative criteria set out in Table 12-11, based upon the guidance within GLVIA3.

12.2.178 What constitutes a significant landscape effect, and what is the meaning of a significant landscape effect' is without specific definition in any related guidance, including the GLVIA3. The GLVIA3 however requires the process of the assessment of significance to be clearly defined for each project and for this to be expressed as transparently as possible. In paragraph 3.32 (and reiterated in paragraphs 5.56) it identifies that:

"There are no hard and fast rules about what effects should be deemed 'significant' but LVIA's should always distinguish clearly between what are considered to be significant and non-significant effects..."

12.2.179 Significance should therefore only be defined in relation to each particular development and its specific location.

Table 12-11 Landscape Effects Significance Criteria

Landscape Effect (indicative)	Description
Major	An adverse or beneficial very large change to a landscape receptor of high sensitivity after embedded design, mitigation and enhancement measures have been taken into account.
Moderate	<p>An adverse or beneficial moderate degree of change to a landscape receptor of moderate sensitivity after embedded design, mitigation and enhancement measures have been taken into account.</p> <p>An adverse or beneficial small degree of change to a landscape receptor of high sensitivity after embedded design, mitigation and enhancement measures have been taken into account.</p> <p>An adverse or beneficial large degree of change to a landscape receptor of low sensitivity, after embedded design, mitigation and enhancement measures have been taken into account.</p>
Minor	An adverse or beneficial very small degree of change to a landscape receptor of low sensitivity, after embedded design, mitigation and enhancement measures have been taken into account
Negligible/None	Little or no perceived change to a landscape receptor despite its sensitivity, after embedded design, mitigation and enhancement measures have been taken into account.

12.2.180 The criteria levels outlined in Table 12-11 and which are set out within the effect significance matrix (Table 12-12) are indicative only. In all cases, a narrative commentary is provided as part of the LVIA, to describe and justify the levels ascribed to each landscape receptor whether they adhere to the criteria listed in Table 12-11 or to criteria between these. While the methodology is designed to be robust and transparent, reasoned professional judgement is ultimately applied to determine the significance of each effect. In line with the GLVIA3, no numerical or formal weighting system has been applied during this process.

12.2.181 The significance ratings indicate a ‘sliding scale’ of the relative importance of the landscape effect, with ‘major’ being the most important and ‘Minor’ being the least. Effects that are towards the higher level of the scale (Major) are those judged to be most important, whilst those towards the bottom of the scale are “*of lesser concern*” (GLVIA3 paragraph 3.35)

12.2.182 Where intermediate ratings are given, e.g. ‘Moderate/Minor’, this indicates an effect that is both less than ‘Moderate’ and more than ‘Minor’, rather than one which varies across the range. In such cases, the rating given first means that the impact is closer to that rating.

12.2.183 Landscape effects that are ‘Major’, ‘Major / Moderate’ or ‘Moderate / Major’ or above in Table 12-12 are considered ‘*significant*’ insofar that a fundamental alteration to a receptor’s key landscape components, characteristics, and perceptual and aesthetic qualities, would occur, which negatively (or positively) and irreversibly (after taking into account the embedded design, mitigation and enhancement measures) alters its overall integral character. This could include small but critical changes to very highly sensitive landscapes, but could also be comprehensive changes to areas with more limited landscape sensitivity. Where the significance of the landscape effect is considered to be ‘Moderate’ reasoned professional judgement is used to determine whether or not this is significant.

Table 12-12 Landscape Effect Significance Scale

		Sensitivity		
		High	Moderate	Low
Magnitude of Change	Very Large	Major	Major / Moderate	Moderate / Major
	Large	Major / Moderate	Moderate / Major	Moderate
	Moderate	Moderate / Major	Moderate	Moderate / Minor
	Small	Moderate / Major	Moderate / Minor	Minor / Moderate
	Very Small	Moderate / Minor	Minor / Moderate	Minor
	Negligible	Moderate / Minor	Minor	None

12.2.184 This does not mean, however, that those effects that are considered to be ‘*not-significant*’ have been disregarded within the planning of the proposed Development or should be disregarded from the planning decision making process.

Methodology for Assessing Effects on Visual Amenities

Visual Impact Characterisation

- 12.2.185 The impact characterisation, or as it is referred to in GLVIA3 - the 'magnitude of change', on each visual receptor is reported in terms of the combination of its 'scale', 'geographical extent', and 'duration and reversibility'.
- 12.2.186 The representative VPs agreed and selected with the F&HDC, NE and AONB unit are used as the most open examples or 'samples' on which to base judgements of the magnitude of change on visual receptors. Many of these VPs have been chosen to represent different types of visual receptor (e.g. users of a PRoW and users of a public Highway, users of a PRoW and users of Open Access Land, or users of a recreation ground and those using an existing settlement).
- 12.2.187 With the exception of specific VPs, each route, settlement or location will encompass a range of possible views, which might vary from no view of the proposed Development to very clear, close views. Therefore, changes are described in such a way as to identify where views towards the proposed Development are likely to arise and what the scale, duration and extent of those views are likely to be. In some cases, this will be further informed by a nearby VP and in others it will be informed with reference to the ZTV, aerial photography and site visits. Each of these individual changes are then considered together in order to reach a judgement of the impact on the visual receptors along that route, or in that place.

Scale

- 12.2.188 This takes into account the loss or addition of features in the view and changes in the composition of the view including the proportion of the view occupied by the proposed Development. It also considers the degree of contrast or integration of any new features, embedded design, mitigation and enhancement measures, or changes in the landscape scene with the existing or remaining landscape elements and characteristics in terms of form, scale and mass, line, height, colour and texture is also considered.

Geographic Extent

- 12.2.189 This takes into account the: general angle(s) of view in relation to the main activity of the receptor (i.e. whether it is direct or oblique); the general proximity of the receptor to the proposed Development i.e. are they within the site, localised/close range - 0-2km; intermediate/ medium range – 2-5km; wide/long range - beyond 5km); the overall geographic extent of area, or length of route, over which the changes would be visible to visual receptors; and whether views would be full, partial or glimpses.

Duration & Reversibility

- 12.2.190 The duration relates to the length of time for which the visual change would be experienced:
- Permanent – the change is expected to be permanent and there is no intention for it to be reversed.
 - Long-term – the change is expected to be in place for 10-30 years and will be reversed, fully mitigated or no longer occurring beyond that timeframe.
 - Medium-term – the change is expected to be in place for 5-10 years and will be reversed, fully mitigated or no longer occurring beyond that timeframe.
 - Short-term – the change is expected to be in place for 0-5 years and will be reversed, fully mitigated or no longer occurring beyond that timeframe.

12.2.191 Most changes will be long-term or permanent; however medium or short-term impact may be identified where mitigation planting is proposed or local factors will result in a reduced duration of change (for example where maturing woodland will screen views in future).

12.2.192 The three factors of ‘scale’, ‘geographic extent’ and ‘duration and reversibility’ are then considered together to derive an overall magnitude of change for each receptor - based on the indicative grading set out in Table 12-13 below, drawn from the guidance within GLVIA3. The reasoned professional judgement considers the distribution of grading for each criterion to make an informed professional assessment of the overall magnitude of change.

Table 12-13 Magnitude of Change upon Visual Receptors

Magnitude of Change (indicative)	Description
Very Large	Where there would be a fundamental change in the character, and an entire change to the make-up and balance of the visual experience, and where the proposals become the dominant, and controlling feature to which all other elements become subordinate, after taking into account the proposed embedded design and mitigation and enhancement measures. Typically involves direct views at close range over a wide horizontal and vertical extent.
Large	Where the proposals would be immediately apparent and prominent (but not wholly dominating) element of the visual experience, where they would considerably alter (but not entirely change) the balance and make-up of views, after taking into account the proposed embedded design, mitigation and enhancement measures. Typically involves direct or oblique views at close range with notable changes over the horizontal and vertical extent.
Moderate	Where proposals would form a visible, distinct and recognisable change in views, but where the balance and make-up of the visual experience is only affected moderately, after taking into account the proposed embedded design, mitigation and enhancement measures. This may lead to an overall change in the nature of the view depending upon the type and nature of change. Typically involves direct or oblique views at medium range with a moderate horizontal and/or vertical extent of the view affected.
Small	Where proposals would be visible as a new feature, but where the change would be limited and not alter the balance and make-up of the visual experience as a whole, and would constitute only a small component of wider views, where awareness of it does not affect the overall experience of the scene, after taking into account the proposed embedded design, mitigation and enhancement measures. Typically involves an oblique view at medium or long range or a direct view at long range with a small horizontal/vertical extent of the view affected.
Very Small	Where only a very small part of the proposed Development is discernible or that it is at such a distance that the changes are scarcely appreciated, after taking into account the proposed embedded design, mitigation and enhancement measures.
Negligible/None	The change in the view is non-existent, imperceptible or difficult to discern, after taking into account the proposed embedded design, mitigation and enhancement measures.

12.2.193 The criteria levels outlined in the tables above are indicative only. In all cases, a narrative commentary is provided as part of this assessment, to describe and justify the criteria levels ascribed to each visual receptor. In line with the GLVIA3 no numerical or formal weighting system was not applied. Where variations between

relevant criteria occur, reasoned professional judgement is applied and described in the assessment to determine the magnitude of change.

Direction of Visual Effects

- 12.2.194 The direction of a visual effect is judged to be positive (beneficial) and/or negative (adverse) or neutral in their consequences for the receptor's visual amenity.
- 12.2.195 The determination of the direction of effect on a visual receptor is related to the baseline situation and what is considered to be by that receptor, on balance, either a desirable or an undesirable change. For this reason, professional judgement has (by necessity) been applied to consider such a subjective matter. As noted in GLVIA3 (paragraph 2.15) this is a "*particularly challenging*" aspect of the LVIA process, particularly in the context of a changing landscape and sustainable development.
- 12.2.196 As there are likely to be both positive and negative impacts identified upon a receptor the assessment has sought to both list these and to make a reasoned professional judgement upon the overall balance between them to determine the overriding direction of effect. For example, a current detracting feature within the landscape may be removed by the development of new built form that is more beneficial to the amenity of a visual receptor, but more extensive in that view. This would therefore have both beneficial and adverse effects. The assessment seeks to identify the resultant direction, positive or negative, after weighing both aspects. Should they be equal in weight a '*neutral*' direction of effect is recorded.
- 12.2.197 This decision is entirely separate to the decision regarding the significance of effect. For example, a rating of 'major' and 'adverse' would indicate an effect that was of great significance and on balance negative, but not necessarily that the proposals would be majorly negative. As such the narrative text within this assessment that accompanies any judgement must be also read and understood.

Assessing Significance of Visual Effects

- 12.2.198 The significance of an effect, whether adverse or beneficial, will be assessed by comparing the sensitivity of the receptor relative to the magnitude of change, and by considering the indicative criteria set out in Table 12-14.
- 12.2.199 What constitutes a significant visual effect and what is the meaning of a significant visual effect is without specific definition in any related guidance, including the GLVIA3. The GLVIA3 however requires the process of the assessment of significance to be clearly defined for each project and for this to be expressed as transparently as possible. In paragraph 3.32 (and reiterated in paragraphs 6.44) it identifies that:
- "There are no hard and fast rules about what effects should be deemed 'significant' but LVIAs should always distinguish clearly between what are considered to be significant and non-significant effects..."*
- 12.2.200 Significance should therefore only be defined in relation each particular development and its specific location.

Table 12-14 Visual Effects Significance Criteria

Visual Effect (indicative)	Description
Major	An adverse or beneficial very large change to the amenity of a visual receptor of high sensitivity after embedded design, mitigation and enhancement measures have been taken into account.
Moderate	<p>An adverse or beneficial medium degree of change to the amenity of a visual receptor of moderate sensitivity after embedded design, mitigation and enhancement measures have been taken into account.</p> <p>An adverse or beneficial small degree of change to the amenity of a visual receptor of high sensitivity after embedded design, mitigation and enhancement measures have been taken into account.</p> <p>An adverse or beneficial large degree of change to the amenity of a visual receptor of low sensitivity, after embedded design, mitigation and enhancement measures have been taken into account.</p>
Minor	An adverse or beneficial very small degree of change to the amenity of a visual receptor of low sensitivity, after embedded design, mitigation and enhancement measures have been taken into account
Negligible	Little or no perceived change to the amenity of a visual receptor despite its sensitivity, after embedded design, mitigation and enhancement measures have been taken into account.

12.2.201 The criteria levels outlined in Table 12-14 and which are set out within the effect significance matrix (Table 12-15) are indicative only. In all cases, a narrative commentary is provided as part of this assessment, to describe and justify the levels ascribed to each landscape receptor whether they adhere to the criteria listed in Table 12-14 or to criteria between these. While the methodology is designed to be robust and transparent, reasoned professional judgement is ultimately applied to determine the significance of each effect. In line with the GLVIA3, no numerical or formal weighting system has been applied during this process.

Table 12-15 Visual Effect Significance

		Sensitivity		
		High	Moderate	Low
Magnitude of Change	Very Large	Major	Moderate	Low
	Large	Major / Moderate	Moderate / Major	Low
	Moderate	Moderate	Moderate	Low
	Small	Moderate / Minor	Minor / Moderate	Low
	Very Small	Minor	Minor	Low
	Negligible	None	None	None

12.2.202 The significance ratings indicate a ‘sliding scale’ of the relative importance of the visual effect, with ‘Major’ being the most important and ‘Minor’ being the least. Effects that are towards the higher level of the scale (Major) are those judged to be most important, whilst those towards the bottom of the scale are ‘of lesser concern’ (GLVIA3 paragraph 3.35).

12.2.203 Where intermediate ratings are given, e.g. ‘Moderate/Minor’, this indicates an effect that is both less than ‘Moderate’ and more than ‘Minor’, rather than one which varies across the range. In such cases, the rating given first means that the impact is closer to that rating. In such cases, the rating given first means that the impact is closer to that rating.

12.2.204 Effects that are ‘Major’, ‘Major / Moderate’ or ‘Moderate / Major’ or above in Table 12-15 are considered ‘significant’ insofar that the proposed Development become the defining element in the receptors’ visual experience, considering the particular aspects of their ‘sensitivity’, and after taking into account the embedded design, mitigation and enhancement measures. This could include small but critical changes to the amenity of very highly sensitive visual receptors, but could also be

comprehensive changes to that experienced by visual receptors with more limited sensitivity. Where the significance of the visual effect is considered to be ‘*moderate*’ reasoned professional judgement is used to determine whether or not this is ‘*significant*’.

12.2.205 This does not mean, however, that those effects that are considered to be ‘*not-significant*’ have been disregarded within the planning of the proposed Development or should be disregarded from the planning decision making process.

12.2.206 The effects identified in this assessment have been described as:

- direct: caused by activities which are an integral part of the proposed Development resulting in a change in environmental conditions;
- indirect: due to activities that affect an environmental condition or receptor, which in turn affects other aspects of the environment or receptors; or
- cumulative: comprising multiple effects from different sources within the proposed Development, or in- combination with other developments on the same receptor(s).

Cumulative Impact Assessment Methodology

12.2.207 The GLVIA3 states, at paragraph 7.2 that cumulative landscape and visual effects are those which:

“...result from additional changes to the landscape or visual amenity caused by the proposed Development in conjunction with other development (associated with or separate to it).”

12.2.208 The GLVIA3, at paragraph 7.5, goes on to identify that:

“The challenge is to keep the task reasonable and in proportion to the mature of the project under consideration. Common sense has an important part to play in reaching agreement about the scope of the assessment. Where the competent authority and other stakeholders are uncertain about the preferred approach the landscape professional may have to exercise judgement about what is appropriate and be able to justify the approach taken. It is always important to remember that the emphasis in EIA is on likely significant effects rather than on comprehensive cataloguing of every conceivable effect that might occur... .”

12.2.209 Whilst the non-cumulative part of this assessment has addressed the effects of introducing the proposed Development into a baseline scenario where other existing development (and development under construction) is present, the cumulative part of this assessment is concerned with the effects of the proposed Development based upon two further cumulative baseline scenarios:

- Other existing development (including development under construction) along with other development that has planning consent;
- The first cumulative baseline, along with other development that is the subject of a formal planning application and potential major schemes that have ‘allocation’ within a development plan.

12.2.210 It is not typical to include development that is only at the development plan ‘allocation,’ or pre-planning application stages as there is generally a lack of information about such proposed Developments, and uncertainty about their deliverability, and as such the implications of these types of development upon the landscape and visual resource are not reasonably foreseeable. The GLVIA3 identifies that, in relation to the inclusion of such development:

“...there may be occasions where such proposed Developments may be included in the assessment if the competent authority or consultation bodies consider this to be necessary. Such a request should only be made if absolutely necessary to make a realistic assessment of potential cumulative effects...” paragraph 7.14

12.2.211 The types of other development to consider within the cumulative part of this assessment, and also the geographical extent of the study area, will vary from project to project. The GLVIA3 identifies that:

“The baseline for the LVIA itself will include evidence about change that may affect the landscape in the future. There may therefore be some degree of overlap with the baseline for the cumulative effects assessment. The key is to ensure that the assessment is true to the spirit of the generic definition of cumulative effects in dealing with ‘other past, present or reasonably foreseeable actions’ but that it is again proportional and reasonable and focuses on likely significant effects.” Paragraph 7.15

12.2.212 Cumulative effects that haven been considered in relation to the proposed Development have included:

- An intensification of the effects of the proposed Development resulting from an extension to it, or the introduction of another development;
- The ‘filling’ of the study area with development over time, such that it may substantially alter the landscape and/or views;
- The interaction between different developments, which may lead to a greater total effect than the sum of the effects of each development individually;
- Temporal effects of simultaneous or successive developments over a period of time;
- Indirect effects of the proposed Development, such as enabling or disabling other development, which may lead to landscape and visual effects;

12.2.213 Cumulative landscape effects would involve additional and/or combined changes to the receptor’s key landscape components, characteristics, and perceptual and aesthetic qualities. Whereas cumulative visual effects may be either:

- In combination - where two or more features are seen together at the same time from the same place, in the same arc of view, with their visual effects being combined;
- In succession - where two or more features are present in views from the same place but cannot be seen at the together because they are not in the same arc of view. As the arc of view experienced by the observer changes, the features become visible in succession;
- Sequential - where two or more features are not present in views from the same point on a route and cannot therefore, ever be seen at the same time even if the arc of view experienced by the observer changes. The observer must move to another point on the same route to see the second or more of them, so they will then appear in sequence. These sequential views may occur frequently along the route, or more occasionally.

12.2.214 Cumulative effects are determined in the same way as set out in paragraphs 12.2.134 to 12.2.205 above, using professional judgement guided by the indicative criteria set out in Table 12-5 to Table 12-15.

Preparation of Visualisations

12.2.215 Visualisations from the six locations along the North Downs escarpment, and one at the southern edge of the AONB, that were agreed with stakeholders and whose location is shown on Figure 12.11 have been prepared to aid the assessment of the visual effect of the proposed development.

12.2.216 These were created using site photography, a DTM (Digital Terrain Model) and a 3D block model of the proposed Development. The methodology used to prepare them complies with the current LI advice notes upon visual representation of proposed Development.

Photography

12.2.217 During the field studies, which were undertaken from Winter 2016 through to Autumn 2021, a photographic record (taken from publicly accessible locations) was made of the current views from the agreed VPs. Whilst it is winter month views (i.e. the worst-case scenario where deciduous trees do not have leaves) that are used in this LVIA the locations were also visited in summer months and at night.

12.2.218 Photographs were taken with a Canon 5D MKIII SLR camera (full frame sensor) with a fixed focal length 50mm lens (35mm film equivalent). Photographs were taken on a levelled tripod 1.50m above ground level and VPs were located using a handheld global positioning system (GPS) unit. A compass bearing was taken as close to the centre of each panorama as possible. A 50% (20 degree) overlap was used between each frame.

Photomontage and Wireline Work

12.2.219 Panoramas were created using PTGui software which corrected the individual frames for barrel distortion and cylindrical projection. These frames are then spliced together digitally with a 50% overlap to produce the final 90 degree horizontal field of view baseline panoramic image.

12.2.220 AutoCAD polylines of the proposed Development area (as indicated on Parameter Plan *OPM(P)4003 Building Heights*) and the proposed structural planting units (as shown on the GI-Strategy and Figure 12.77) for three of the assessment periods were then 'draped' onto a surface ground model (created using OS Terrain 5 DTM data). Each proposed Development area was then extruded to the maximum height from ground level as indicated on the parameter plan. The planting units were extruded in accordance with the anticipated growth heights set out in Table 12-24..

12.2.221 Resoft Windfarm R4 was used to create the wirelines using the photomontage module within the program to accurately locate the proposed Development areas and planting – described above. 3DS Max software was then used to render the blocks and planting units and the final images were edited using Adobe Photoshop.

12.2.222 The colours of the proposed Development areas in the visualisations do not reflect the intended colours of the proposed Development's built form as NE, in their letter upon the EIA-LVIA 2019 requested that this was reconsidered. Neither do they reflect the colours shown on Parameter Plan *OPM(P)4003 Building Heights* as these are too similar in colour. The colours have therefore, instead, been selected to provide great clarity of the proposed Development's built form in the visualisations, and to highlight the blocks height differentials. Pink shows those proposed Development areas with a height up to 12m, purple shows those proposed Development areas with a height up to 15m, and blue shows those proposed Development areas with a height up to 18m (all in metres above existing levels).

12.2.223 The proposed Development areas and planting units were accurately positioned over the photograph and masked out where they were hidden by existing intervening vegetation, buildings or topography. The 90 degree baseline image (cylindrical projection) was used as the base image for the photomontages. Once the photomontages were completed, 53.5 degree extracts were then cropped out of the 90 degree photomontage and resized to 820 x 260mm and then re-projected to planar projection using Hugin software.

12.2.224 The baseline photographs (with an image size of 820 x 250mm) and wirelines (Figures 12.53, 12.56, 12.59, 12.62, 12.65, 12.68 & 12.73), and the completed photomontage images (Figures 12.54, 12.55, 12.57, 12.58, 12.60, 12.61, 12.63, 12.64, 12.66, 12.67, 12.69, 12.70, 12.71, 12.72, 12.74 & 12.75) are displayed with the relevant geographical and technical data on A1 landscape sheets to comply with the current LI guidelines for a Type 3 visualisation.

12.2.225 Only assessment scenarios AS2, AS3 and AS4 have been visualised in this way as it is not possible at this point in time to determine which of the proposed phases of the proposed Development would be under construction at AS 1 – peak construction year.

12.2.226 The visualisations do not show all the proposed structural planting:

- The proposed hedgerows, hedgerows with trees, tree lines/avenues could not be accurately visualised at this level, so are not shown.
- The structural planting units which cannot be determined until the further masterplanning, design code and reserved matter applications are prepared (such as within minor, yet unplanned, public open spaces and along the secondary and tertiary roads through the proposed Development parcels - upon which there is currently insufficient masterplanning detail to determine even their indicative location) are also not shown.
- The likely breaks through the planting units that are necessary for the creation of movement corridors are also not shown as it is not possible to determine, at this stage in the tiered planning process, where these would be.

12.2.227 The visualisations also do not show the likely growth in height and width of the existing woodlands, tree belts, tree and hedgerows seen in the photographs that it is reasonably anticipated would occur by assessment scenarios AS2, AS3 and AS4.

Non-visualisation Viewpoints

12.2.228 The baseline photographs for all VPs are presented (Figures 12.12-12.52) as annotated cylindrical panoramic images with a 90° HFoV on A1 sheets (giving an 820 x 250mm sized images). Where the VP is located near to the site boundary, and so spans more than a single 90° HFoV, the VP is spread across 1-2 further A1 sheets. In such instances, the overall panorama (with a greater HFoV, but narrower image) is also shown alongside for reference.

Limitations and Assumptions

Limitations

Extents of the Study Area

12.2.229 As set out in paragraph 12.2.249 effects on receptors outside the visual envelope of the proposed Development and beyond 10km from the location of the site have been scoped out as it is judged that significant landscape and visual effects will not occur beyond this distance.

Outline Planning

12.2.230 As a result of the outline nature of the planning application, the LVIA is reliant primarily upon the planned elements of the proposed Development as provided in ES Appendix 4.1, set out on the Parameter Plans, as described within the OP-DS, the design principles committed to in the SDP (including those elements and design principles of the supporting documents that the SDP/Parameter Plan reference such as the proposed areas of structural planting set out in the Appendix of the GI-Strategy) and the commitments made in the 'Commitments Register' (ES Appendix 2.6).

12.2.231 Given the outline nature of the proposed application, the LVIA has also been cognisant of aspects of the supporting documents and plans (i.e. the Illustrative Masterplan, the DAS, the CKVS, the GI-Strategy, and the strategies upon heritage, transport and long-term stewardship) and the mitigation-related commitments that have been made within these, which are collected together within the 'Commitments Register'.

12.2.232 The LVIA has been mindful of the planning status these documents and plans have and the limitations in the level of detail they provide, in so far that the 'worst-case' scenario is used where assumptions need to be made.

Proportionality

12.2.233 Taking into account the scale and type of development proposed and having regard for the issue of proportionality, as recommended within paragraph 6.2 of GLVIA3, only those effects that are likely to be significant are assessed within this report.

Visualisations

12.2.234 Whilst the Illustrative Plans and illustrations within the DAS indicate a potential layout of the proposed Development the Parameter Plans provide the maximum parameters in which the proposed Development will be contained (i.e. the worst-case scenario). As such, the form and style of the visualisations (rendered wirelines) that have been prepared as part of this assessment, were chosen to show the height of the tallest of buildings (to the ridge lines of their pitched roofs) within proposed Development parcels for which outline planning permission is being sought.

12.2.235 The visualisations do not, therefore, demonstrate the greater visual permeability that would exist in reality should the aspects of: gaps between individual buildings; variety in building height and building density; and pitched roofs be taken into account.

12.2.236 The resultant rendering of these does not indicate the likely: variety in colour, texture and material that proposed buildings would display in reality. The colours used on the visualisations are instead reflective of the three proposed building height categories shown on parameter plan *OPM(P)4003 Heights*. In addition the visualisations do not display the fading with distance and detailed shadowing between buildings that would also exist.

12.2.237 As such, whilst this style of visualisation is suitable for an OPA, it is not intended to provide a realistic image of how the finished proposed Development might look.

12.2.238 The visualisations do not show the extents of other committed schemes given the unavailability of the 3D models of all of these and the fact that the majority of schemes do not appear within the panorama of LVIA viewpoints. The cumulative assessment instead relies upon a qualitative understanding of the development extents and parameters of these schemes.

Assumptions

Professional Judgement

12.2.239 To avoid making assumptions regarding other people's expected responses to changes in landscape character and visual amenity matters, subjective judgements are avoided where possible in this LVIA. The focus instead is predominantly upon what objectively would be experienced as a result of the proposed Development. Given, however, the complexity of site's context, the timescale across which change would occur and the broad number of user types likely to be affected, a degree of subjective professional judgment does have to be applied to the assessment process. Where this occurs the LVIA uses a combination of quantitative and qualitative considerations involving the use of structured, informed and reasoned professional judgement in a transparent manner.

Distances

12.2.240 Where distances are given in the assessment, these are approximate distances (rounded to the nearest 10m) between the nearest part of the site and the nearest part of the receptor in question, unless explicitly stated otherwise. Distances to residential properties are also approximate (rounded to the nearest 10m) and given to the dwelling (not the garden).

Construction Programme

12.2.241 The proposed construction programme indicates that peak construction would be in 2030, seven years following commencement, and that the full construction would be complete by 2042.

Assessment Phasing

12.2.242 The OP-DS states that there is no current planned chronological phasing of the proposed Development areas shown upon plan *OPM(P)4004 – Indicative Phases* (OPA document number 3.3). As such, this LVIA assumes the worst case scenario that any of the 'Character Areas' (as termed in the SDP) could be constructed first, and any of the remaining could come forward at any time. It is also assumed, however, that the construction of these would be relatively sequential in so far that not all proposed Development areas would be constructed at once.

Assessment Scenarios

12.2.243 In order to assess the effects on landscape character and visual amenity receptors that would be brought about by the proposed Development (both with our without full build out of the permitted waste facility at Otterpool Quarry) during the course of its construction and its operation, but also giving consideration to the fact that parts of the proposed Development are likely to be in operation (i.e. occupied by residents and businesses etc.) whilst further construction is being undertaken the assessment has been undertaken at specific points in time:

- **Assessment Scenario 1 (AS1):** Peak construction year (year selected based on the assumptions set out in *Chapter 2: EIA Approach and Methodology*)
 - 2030 (seven years following construction commencement)
- **Assessment Scenario 2 (AS2):** proposed Development completion, start of operation
 - 2042 (nineteen years after construction commencement).
- **Assessment Scenario 3 (AS3):** Year 15 of operation
 - 2057 (when structural planting implemented as part of the proposed Development is anticipated to have established).
- **Assessment Scenario 4 (AS4):** Year 30 of operation
 - 2072 (when structural planting implemented as part of the proposed Development is anticipated to have established).

12.2.244 The terminology AS1, AS2 etc. is used throughout section 12.5 – *Assessment of Residual and Cumulative Effects*, and in the detailed assessment tables in ES Appendix 12.2.

Private Dwellings within the site Boundary

12.2.245 As indicated by the Appendix 3 of the OP-DS and by drawing *OPM(P)2018_YY – ‘Existing Buildings to be Demolished & Retained’*, there are a number of existing dwellings within the application site boundary. Some, but not all of these are in the ownership of the applicant.

12.2.246 The OP-DS and plan *OPM(P)2018_YY* indicate which of these is proposed for demolition, which of these is proposed for retention and those whose demolition cannot be decided until the further tiered planning stages.

12.2.247 It is undecided at this stage of the tiered planning process:

- whether the current residents of the properties to be retained would remain in their dwellings for the duration of the construction and operation period;
- which of the dwellings that would be retained would keep their current domestic curtilages, and which would lose theirs – and so be more closely incorporated into the detailed new street layouts that would be developed at further tiered planning stages; and
- at what stage during the construction process those that are not to be retained would be actually demolished, and whether or not the current residents would remain in them up to that point.

12.2.248 In line with other aspects of this LVIA the assessment assumes a reasonable worst case scenario where by the:

- all dwellings whose demolition cannot be decided until the further tiered planning stages may be retained;
- any of these dwellings may be the only one of this group that is in fact retained;
- The current residents of those dwellings to be retained remain in their properties (with the existing domestic curtilage, vegetation and access intact) for the duration of the construction period and operation period; and
- The current residents of those properties to be demolished remain in their dwellings with the existing domestic curtilage, vegetation and access intact) until the end of the construction period.

Effects Scoped Out

12.2.249 On the basis of the following matters, effects on receptors outside the visual envelope of the proposed Development and beyond 10km from the boundary of the site were scoped out, as it is judged that significant landscape and visual effects would not occur beyond this distance (see paragraph 12.2.124):

- the desk-based assessments and field survey work undertaken;
- the reasoned professional judgement of the assessment team;
- analysis of assessments previously carried out on the site; and
- feedback received from consultees.

12.2.250 No specific assessment has been made, in this Chapter, of impacts on the historic landscape character of the site and its surrounds or any cultural heritage receptors such as Conservation Areas, Registered Parks and Gardens of Special Historic Interest, Scheduled Monuments and Listed Buildings. These are covered within Chapter 9: Cultural Heritage.

12.2.251 The impact on the provision, capacity, and recreational value of public rights of way (PRoWs) is assessed in Chapter 14: Socio-Economic Effects and Community.

12.2.252 The direct effect of increased traffic on roads that are within the Kent Downs Area of Outstanding Natural (AONB) is assessed in the Chapter 16: Transport. The indirect effect of this upon landscape character and visual amenity is assessed within this LVIA.

12.2.253 The effect upon the Folkestone to Etchinghill Escarpment Special Area of Conservation and other areas for their biodiversity value within the AONB is assessed in the Chapter 7: Biodiversity.

12.3 Baseline

Existing Baseline

Landscape Character Baseline

12.3.1 The published, and site-specific landscape character assessments, supplemented by fieldwork, have informed the identification of landscape character receptors for use in this assessment. The relevant descriptions of the landscape context of the site and its surrounds contained within these landscape character assessments and their related guidance documents, that have been used in the preparation of this assessment are set out below. Refer also to the site-specific landscape character assessment is contained with ES Appendix 12.1).

National Level Character Assessment

12.3.2 NE has divided England into 159 distinct National Character Areas (NCAs). Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. As shown on Figure 12.4 the site sits within NCA no.120 - Wealden Greensand. The description of this NCA and the three others covered by the study area (NCA no.119 North Downs; NCA no.121 - Low Weald; and NCA no.123 - Romney Marshes) are set out in a series of written profiles published by NE (Ref 12.30). The key characteristics of these areas and aspects described in these publications that are relevant to the site and its surrounds, the proposed Development and this assessment are described in the following paragraphs.

NCA no.120 - Wealden Greensand

Area Description

- 12.3.3 The NCA no.120 - Wealden Greensand runs parallel with the North Downs NCA through Kent and Surrey and separates this from NCA no. 121 - Low Weald to the south. The underlying calcareous Sandstone and Ragstone geology has shaped the scarp-and-dip slope topography of the narrow Greensand Ridge that follows much of the southern edge of this area. This also has had a significant bearing on the area's sense of place in terms of settlement, built vernacular architecture, industry and structural vegetation and agriculture.
- 12.3.4 In relation to the site and the study area, NCA no.120 - Wealden Greensand covers the corridor between Ashford and the Hythe/Folkestone conurbation, up to and including the coastline.

Key Characteristics

- 12.3.5 The key characteristics of NCA no.120 - Wealden Greensand are:
- an undulating and organic landform which is gentler and more open through east Kent, but which offers far-reaching views over adjoining areas, including the NCA no.123 – Romney Marshes from the ancient coastline of the Lympne Escarpment;
 - a landform that has been shaped by numerous water courses that pass through the area;
 - extensive areas of mixed woodland and coppice containing hazel, oak, birch, and sweet chestnut;
 - small or medium irregular shaped fields parcels derived from medieval enclosure, and bounded by hedgerows and shaws (remnant strips of cleared woodland) comprising hawthorn and blackthorn, also with occasional oak trees, and often trimmed low;
 - mosaic of mixed farming with occasional orchards;
 - mixture of dispersed farmsteads, hamlets and some nucleated villages, using Kentish Ragstone and weatherboarding in their built vernacular, along with large houses set within extensive parks and gardens;
 - numerous towns and transport infrastructure between Dorking & Folkestone which have reduced the tranquillity of the eastern end of NCA no.120 - Wealden Greensand;
 - wide range of historic landscape features including old military defences, prehistoric tumuli, Roman remains, small quarries, older deer parks and more recent 18th-century parklands.

Landscape Change

- 12.3.6 The profile for NCA no.120 - Wealden Greensand describes the pressure that is likely to occur on this area from future new development and advises the use of well-planned GI within these to bring about a range of environmental benefits.

Statements of Opportunity

- 12.3.7 The following '*Statements of Opportunity*' for NCA no.120 - Wealden Greensand (which are relevant to the site and its surrounds, the proposed Development and this assessment) are provided in its written profile:

- *“SEO 1: Protect and manage the nationally recognised and distinctive character of the landscape, conserving and enhancing historic landscape character, tranquillity, sense of place, and the rich historical and geological heritage of the Wealden Greensand. Enhance access provision where appropriate, to maintain public benefit from and enjoyment of the area.” For example by:*
 - *“Restoring and creating broadleaved woodlands surrounding major transport corridors and urban areas to help reduce noise, light and air pollution, and to maintain and enhance the pockets of tranquillity.*
 - *Maintaining and enhancing access to geodiversity, providing educational and research opportunities, and linking communities with their local heritage, including through the sensitive restoration of redundant quarries, exploiting their biodiversity, recreational and geological potential.*
 - *Restoring and managing the nationally important parklands ... Management works should be prioritised and informed by an assessment of the historic design, use and significance of the parkland.*
 - *Conserving and improving the management of historical landscape features ... while promoting opportunities for access, education and sensitive interpretation at historic sites.”*
- *“SEO 3: Manage and significantly enhance the quality of the characteristic wetland and water environment of the Greensand. This will contribute to sustainable flood risk management, will benefit the regulation of water quality and water availability, as well as enhancing the sense of place, biodiversity, recreation and wetland habitat adaptation to climate change.”*
- *“SEO 4: Plan to deliver a network of integrated, well managed green spaces in existing and developing urban areas, providing social, economic and environmental benefits, and reinforcing landscape character and local distinctiveness – particularly on or alongside the boundaries of the designated landscapes within the Wealden Greensand.” For example by:*
 - *“Where appropriate, creating areas of broadleaved woodland (under coppice management where possible) around towns to provide a buffer to new development. Providing local recreational opportunities that divert pressures from the SPA and SAC designated areas of heath, helping to provide climate change adaptation, flood alleviation, enhanced landscape character and biodiversity benefits.*
 - *Creating enhanced areas of new – and improving any existing – multifunctional natural green space, including community food gardens, orchards, and extensive wetlands that form part of sustainable urban drainage systems. These link into the heart of urban areas and provide sustainable recreational links into the wider countryside as part of green infrastructure planning. They will help to meet Accessible Natural Greenspace Standards (ANGSt), and ensure that developments retain soil functionality, as much as possible and do not have a negative effect on flood risk within NCA no.120 - Wealden Greensand.*
 - *Ensuring that development and its associated infrastructure (including light, noise and air pollution), does not intrude on the rural landscapes or the special qualities of adjacent protected landscapes conserving remaining areas of tranquillity.*
 - *Promoting the use of sustainable and locally sourced materials, vernacular building techniques and styles, and existing landscape character, to inform design and ensure integration with the surrounding landscape.*

- *Developing a strategic approach to green infrastructure across the NCA and its boundaries, to take account of the existing urban areas and areas of growth. Planning a network of green spaces across the urban areas, urban fringe and adjacent countryside, which can result in multiple benefits for the environment and communities.”*

NCA no. 119 - North Downs

- 12.3.8 NCA no. 119 - North Downs comprises the escarpment and dip slopes of the linear chalk landform that stretches between the Hog's Back in Surrey to the White Cliffs of Dover. It separates the Wealden landscape to its south with the Thames valley and estuary areas to the north.
- 12.3.9 In relation to the site and the study area, NCA no. 119 - North Downs covers the foot-slopes, scarp-slopes, escarpment and dip-slopes of the North Downs between Wye and Caple-le-Ferne. At its closest point it lies approximately 1.9 km north of the site boundary. The Zone of Theoretical Visibility (ZTV) shown on Figure 12.10, indicates that areas of NCA no. 119 - North Downs between the Wye National Nature Reserve and Dover Hill have the potential to obtain views to the proposed Development.

Key Characteristics

- 12.3.10 The key characteristics of NCA no. 119 - North Downs (which are relevant to the site and its surrounds, the proposed Development and this assessment) are:
- A distinctive chalk downland ridge with a steep scarp slope facing south and gentle incised dip slope heading northwards;
 - Views from the “eastern scarp are dominated by generally undeveloped landscapes much valued by visitors, with outstanding views across the Vale of Holmesdale to the Weald and from many parts of the downs to France. These views are affected to varying degrees by the Channel Tunnel terminal development and the M25 and M20 corridors”;
 - Influence from the urban-fringe of numerous settlements and major transport routes occur lie close to the boundary upon tranquillity and sense of remoteness, but “*areas of extensive woodland cover and farmland offer tranquillity and calm even where development is present.*”

Landscape Change

- 12.3.11 The written profile for NCA no. 119 - North Downs describes the pressure from existing and new development close to its edge, and how “*high-quality and well managed green infrastructure both within and surrounding the character area could help to service the demands of a growing population.*”

Statements of Opportunity

- 12.3.12 The following ‘*Statements of Opportunity*’ for NCA no. 119 - North Downs (which are relevant to the site and its surrounds, the proposed Development and this assessment) are provided in the written profile of the character area:
- “*SEO 1: Manage, conserve and enhance the distinctive rural character and historic environment of the North Downs, Protect the tranquillity of the landscape and sensitively manage, promote and celebrate the area’s rich cultural and natural heritage, famous landmarks and views for future generations.*” For example by:
 - “*Using AONB design guidance ...to informand plan for and inspire any new development which makes a positive contribution to local character.*”

- *Seeking opportunities to minimise the impact of new developments, including visual intrusion, disturbance and noise, on the tranquillity and beauty of the countryside. Green infrastructure planning should be maximised for its multiple benefits”*
- *“SEO 2: Protect, enhance and restore active management to the diverse range of woodlands and trees of the North Downs,... . Seek opportunities to establish local markets for timber and biomass to support the active management of local woods, ...” For example by:*
 - *“encouraging new markets for the products of native woodland underwood and timber. This will provide the market driver to encourage and maintain viable and sustainable woodland management.”*
- *“SEO 4: Plan to deliver integrated, well-managed multi-functional green space in existing and developing urban areas, providing social, economic and environmental benefits and reinforcing landscape character and local distinctiveness, particularly on or alongside the boundaries of the designated landscapes within the North Downs.”*

NCA no.121 - Low Weald

12.3.13 NCA no. 121 - Low Weald is a broad, low-lying clay vale which largely wraps around the northern, western and southern edges of the High Weald, and which borders NCA no.120 - Wealden Greensand to its north and west.

12.3.14 In relation to the site and the study area, NCA no. 121 - Low Weald covers the broad area between Ashford and NCA no.123 - Romney Marshes. At its closest point it lies approximately 3.5 km west of the site boundary, beyond the village of Aldington. The ZTV shown on Figure 12.10 indicates that there are a few areas of NCA no. 121 - Low Weald between the Ashford-Dover railway line in the north and Stone Cross in the south that have the potential to obtain views to the proposed Development. Much of this area is however wooded, and the written profile for NCA no. 121 - Low Weald recognises that as a result *“views to higher ground are limited”*.

Key Characteristics

12.3.15 The key characteristics of the Low Weald NCA (which are relevant to the site and its surrounds, the proposed Development and this assessment) are:

- *“broad, low-lying, gently undulating clay vales with outcrops of limestone or sandstone providing local variation;*
- *A generally pastoral landscape with ... areas of fruit cultivation in Kent;*
- *Field boundaries of hedgerows and shaws ... enclosing small, irregular fields and linking into small and scattered linear settlements along roadsides or centred on greens or commons. Rural lanes and tracks with wide grass verges and ditches;*
- *Small towns and villages are scattered among areas of woodland, permanent grassland and hedgerows on the heavy clay soils where larger 20th-century villages have grown around major transport routes;*
- *Frequent north–south routeways and lanes, many originating as drove road,”*

Statements of Opportunity

12.3.16 The following ‘*Additional Opportunity*’ for the Low Weald NCA (which is relevant to the site and its surrounds, the proposed Development and this assessment) is provided in NCAP-121:

- *“Additional Opportunity 1: Plan for the creation of high-quality blue and green space and green corridors to provide a framework for new and existing development in urban areas and along major transport routes for the enjoyment and wellbeing of communities” For example by:*
 - *“Working to identify and maintain important views to elevated landforms outside the NCA such as the Wealden Greensand ... ;*
 - *Creating ... extensive areas of multifunctional green space within and surrounding ... identified new development areas, ... as part of green infrastructure planning;*
 - *Creating community allotments and potentially developing community orchards on the edges of urban areas;*
 - *Encouraging measures such as restoration and expansion of networks of hedgerows and shaws to minimise the effects of development and its associated infrastructure (including light, noise and air pollution) intruding on the rural character and the special qualities of adjacent protected landscapes;*
 - *Ensuring that high-quality green infrastructure provision is integral to all development planning ...;*
 - *Seeking to conserve areas with high levels of tranquillity ... of this predominantly rural area.*
 - *Encouraging detailed landscape assessment in advance of all significant development to identify ways of minimising impact on the rural character”*

NCA no. 123 - Romney Marshes

12.3.17 As described in the written profile for NCA no.123 - Romney Marshes is an *“open landscape of reclaimed, low-lying marshland. The area is bounded to the south and east by the English Channel and to the north and west by the clearly recognisable ancient cliff-line, which now forms the backdrop to the marshes.”*

12.3.18 In relation to the site and the study area, NCA no.123 - Romney Marshes covers the broad area beyond the southern edge of NCA no.120 - Wealden Greensand. At its closest point it lies approximately 300m south of the site’s boundary along Aldington Road. NCA no.123 - Romney Marshes encompasses the lower half of the Lympne Escarpment. The ZTV shown on Figure 12.10, indicates that there are areas of NCA no.123 - Romney Marshes that have the potential to obtain views to the proposed Development. The written profile for NCA no.123 - Romney Marshes recognises that the *“flat topography of the Romney Marshes allows for long views across to neighbouring, higher NCAs.”*

Key Characteristics

12.3.19 The key characteristics of the Romney NCA (which are relevant to the site and its surrounds, the proposed Development and this assessment) are:

- *“Romney Marshes is a flat, open and agricultural landscape, with distinctive drainage dykes, marshes and open skies. ... ;*
- *Former sea cliffs, mainly of sandstone, mark the post-glacial shoreline and form a notable feature overlooking Romney Marshes at Lympne, Rye, Winchelsea, Hythe and Pett;*
- *Low woodland cover features throughout, with clumps of trees and patches of woodland found on the higher ground and around settlements.*

- *Narrow, straight roads and winding lanes link the widely dispersed settlements, with their distinctive churches. The overall open character provides a sense of remoteness.*
- *Dungeness Power Station forms a prominent landmark on the coastline. Widely visible from other NCAs, the power station and its transmission lines that extend out from the NCA provide energy for the National Grid. Little Cheyne Court Wind Farm is also a prominent landmark on the skyline across the area and can be seen from adjoining NCAs.”*

Statements of Opportunity

12.3.20 The following ‘*Statement of Opportunity*’ for the Romney Marshes NCA (which are relevant to the site and its surrounds, the proposed Development and this assessment) are provided in NCAP-123:

- *“SEO 1: Maintain and enhance the distinctive character of the remote, open, low-lying Romney Marshes landscape, recognise the value they provide in contributing to the understanding of the landscape and its history, local distinctiveness and sense of place;” For example by:*
 - *“Maintaining landscape character, tranquillity, sense of remoteness and connection to the maritime environment by ... ensuring that any new development and its associated infrastructure (including light, noise and air pollution) does not undermine or have a detrimental impact on the tranquillity of the marshes and landscape character.”*

County Level Landscape Character Assessment

Landscape Assessment of Kent, 2004

- 12.3.21 KCC published the *Landscape Assessment of Kent* (LAK) in 2004 (Ref 12.31). It drew together existing landscape character assessments of the county and updated them to conform to the landscape character assessment guidance current to that time. The authors intend the LAK to be used “*in a variety of forward planning strategies, in land management schemes and in planning control.*” (paragraph 1.1.2).
- 12.3.22 The objectives for the LAK are based upon “*identifying the important characteristics of the landscape that assist the process of accommodating change, where this is both desirable and practicable, whilst maintaining the links with the past and the natural environment.*”
- 12.3.23 The LAK highlights that there “*is a need to retain pattern and diversity in the landscape to ensure that character and local distinctiveness are maintained.*” And that “*this is not necessarily about keeping the landscape as it is but is more about preventing everywhere becoming the same*” (section 1.0).
- 12.3.24 The LAK also highlights that its study only offers a “*broad-brush, strategic approach*” and that the character areas identified within it “*may have pockets that are in better or worse condition, or higher or lower sensitivity*” than the summarised conclusions drawn.
- 12.3.25 For this reason, the LAK states the intention that “*for development proposals, the most detailed / local landscape assessment [if available] should be referred to in the first instance*” (paragraph 1.1.4) rather than this county-wide landscape character assessment.

- 12.3.26 In addition, it is important to highlight that the LAK:
- was written fourteen years ago, and as such the landscape described within it has the potential to have materially altered;
 - was written prior to the most up-to-date An Approach to Landscape Character Assessment publication by NE in 2014; and
 - was written prior to the publication of more detailed landscape character assessment for the F&HDC and ABC administrative areas.
- 12.3.27 As such the more recent and targeted LCAs for the F&HDC and ABC areas have been more greatly relied upon than the LAK for the purpose of this assessment. This is an opinion reinforced by the AONB-MP (2014-2019):
- “The Kent Landscape Group (a group of landscape practitioners and managers established through the Kent Forum’s Kent Environment Strategy) has identified that the County and Local Landscape Assessments do not necessarily align and that there is a need for a review of the 2004 Landscape Assessment for Kent.” (Section 4.3)*
- 12.3.28 Nevertheless, many of the assessments made within the LAK are still crucial to understanding the relative importance of the landscapes within this assessment’s study area at a county-level, and are hence summarised below.
- 12.3.29 The LAK divides the county into eight regional zones, that loosely follow the NCA’s identified by NE (see paragraph 12.3.2). Within these the LAK identifies 209 individual LCAs (see Figure 12.6 for those within the study area of this assessment). For each area the LAK describes its general character and key features.
- 12.3.30 It then set outs the overall ‘*condition*’ of the character area as defined by its: pattern of elements; detracting features; visual unity; cultural integrity; ecological integrity; and functional integrity.
- 12.3.31 It also defines the character area’s overall ‘*sensitivity*’ as defined by its: distinctiveness; continuity; landform; extent of tree cover; and visibility.
- 12.3.32 Section 6.0 of the LAK states that this “analysis gives a broad indication of each area’s ability to accommodate a change in management or use without loss of overall integrity.”
- 12.3.33 The categorisation of ‘*condition*’ (good, moderate or poor) and ‘*sensitivity*’ (low, moderate or high) are set against each other upon a matrix (see Image 12-6) which determines the broad landscape ‘*strategy*’ for that character area, which may be used to “*assist in the direction of any policy that might be applied to the land in question.*”

Image 12-6 Extract from *The Landscape Assessment of Kent (2004)* - Section 6.0, Condition / Sensitivity Matrix

Condition	good	REINFORCE	CONSERVE & REINFORCE	CONSERVE
	moderate	CREATE & REINFORCE	CONSERVE & CREATE	CONSERVE & RESTORE
	poor	CREATE	RESTORE & CREATE	RESTORE
		low	moderate	high
		Sensitivity		

12.3.34 The LAK provides definitions for each ‘strategy’:

- Conserve - actions that encourage the conservation of distinctive features and features in good condition.
- Conserve and reinforce - actions that conserve distinctive features and features in good condition, and strengthen and reinforce those features that may be vulnerable.
- Reinforce - actions that strengthen or reinforce distinctive features and patterns in the landscape.
- Conserve and restore - actions that encourage the conservation of distinctive features and features in good condition, whilst restoring elements or areas in poorer condition and removing or mitigating detracting features.
- Conserve and create - actions that conserve distinctive features and features in good condition, whilst creating new features or areas where they have been lost or are in poor condition.
- Restore - actions that encourage the restoration of distinctive landscape features and the removal or mitigation of detracting features.
- Restore and create - actions that restore distinctive features and the removal or mitigation of detracting features, whilst creating new features or areas where they have been lost or are in poor condition.

- Reinforce and create - actions that strengthen or reinforce distinctive features and patterns in the landscape, whilst creating new features or areas where they have been lost or are in poor condition.
- Create - actions that create new features or areas where existing elements are lost or in poor condition.

12.3.35 The LAK then provides 'guidelines' "which are locally appropriate to the character area and respond to the generic strategies that have been identified."

12.3.36 Figure 12.6 identifies that the site spans across three character areas identified within the LAK, and a further twenty one fall within the study area and ZTV of the proposed Development. The key characteristics of each area, that are relevant to this assessment, and their '*condition*', '*sensitivity*', and '*strategy*' are set out in Table 12-16 and Table 12-17.

Table 12-16 Summary of the findings of the Landscape Assessment of Kent (2004) – for character areas whose extents cover part of the site

LAK Character Areas whose extents form part of the site)	Key characteristics	Condition	Sensitivity	Strategy and Actions
<p>Aldington Ridge (encompassing the south, south-west and west half of the site)</p>	<p>Well drained, good quality loam soils across generally open rural pasture, which gradually slope down to the Sellindge Plateau, with the North Downs visually above.</p> <p>The settlements of Lympe and its industrial estate on the site of the old airfield are discordant elements in the landscape, their siting appearing “<i>unrelated to topography or other natural features</i>”.</p>	<p>MODERATE: strongly unified with few visual detractors, apart from the Industrial Estate – which weakens its ‘functional integrity’. Other built form has a moderate positive impact - large farmsteads and houses are interspersed with 20th century linear development. Sparse woodland cover.</p>	<p>HIGH: the ridgeline road, the Ragstone farmsteads upon it, pasture and copses give area an “<i>ancient time depth</i>.” Moderate ‘sense of place’. Visibility ‘high’ due to elevation and limited tree cover.</p>	<p>CONSERVE and RESTORE:</p> <p>“<i>Restore the frequency of woodland areas to the lower slopes of the ridgeline.</i></p> <p><i>Restore a smaller scale, but more open landscape by removing field boundary divisions.</i></p> <p><i>Conserve the open settings of the farmsteads.</i></p> <p><i>Conserve the infrequency of built form and conserve open views.</i></p> <p><i>Conserve the open nature of the field system.</i></p> <p><i>Conserve and restore small woodland areas.”</i></p>

LAK Character Areas whose extents form part of the site)	Key characteristics	Condition	Sensitivity	Strategy and Actions
<p>Sellindge Plateau Farmlands</p> <p>(encompassing the north, north-east, and east half of the site)</p>	<p>A large scale, gently undulating open plateau landscape of deep silty brickearth soils that support arable crops, and pasture particularly along streams. There are small copses, but hedgerows are gappy or missing.</p> <p>Sellindge and the settlements around Folkestone Racecourse sprawl across the landscape, and the M20 and railway line bring physical and aural discordance and disruption to it.</p>	<p>VERY POOR: a “<i>fragmented landscape with little clear pattern and many visual detractors associated with road and rail transport corridors and linear development. Agricultural buildings and fences also detract from the view. ... tree cover is poor and built form has a high negative impact on the area. Ragstone and brick vernacular buildings are overshadowed by recent built development.</i>”</p>	<p>MODERATE: the historic landscape patterns are obscured, there is a lack of distinction and sense of place, but the area is visually apparent, with some long views.</p>	<p>RESTORE and CREATE:</p> <p>Take the opportunity to “<i>create a new landscape framework using small woodland and copses, that respect the small scale patterns of adjacent character areas.</i></p> <p><i>Restore historical landscape framework in key areas immediately around the remaining farming settlements.</i></p> <p><i>Create landscape features to define linear settlements and transport corridors, and control visual detractors.</i>”</p>
<p>Upper Stour Valley</p> <p>(a small area in the very north-west of the site)</p>	<p>A flat, open, relatively bland valley landscape enclosed by outliers of Greensand which restrict views. Mixed intensive farming, including a high percentage of arable, has led to the discordant fragmentation of this landscape with only occasional clumps of trees and copses, irregular riparian vegetation, and gappy hedgerows.</p>	<p>VERY POOR: a fragmented, visually ununified landscape resulting from intensive farming, vegetated field boundary degradation, coupled with the presence of many visual detractors such as overhead cables, transport corridors, village enlargements, and industrial development which has led to some neglected areas.</p> <p>There is some positive impact from the visible cultural heritage of large red brick farms, estate parkland, ragstone walls and bridges.</p>	<p>LOW: Strength of character is weak with an indistinct sense of place. Landform is insignificant and the lack of tree cover gives a moderate visibility.</p>	<p>CREATE:</p> <p>“<i>Create a new landscape structure building upon the existing ditches and hedgerows to create linked corridors for wildlife.</i></p> <p><i>Ensure that the important roadside hedgerows are gapped up and reinforced with standard trees to give structure to the landscape.</i></p> <p><i>Create new hedgerows and copses to screen intrusive elements such as the urban edge and transport corridors.</i></p> <p><i>Create new waterside and ditch vegetation using native wetland species and pollarded willows to reinforce the riparian character.</i>”</p>

Table 12-17 Summary of the findings of the Landscape Assessment of Kent (2004), for character areas whose extents lie fully outside of the site but within the study area

LAK Character Areas within this assessment's study area, but outside of the site	Key characteristics (relevant to this assessment)	Condition	Sensitivity	Strategy and Actions
Petham: East Kent Downs	Intimate, remote, long rolling chalk valleys, with deciduous woodland on ridges, and overgrown hedgerows with many trees.	GOOD	HIGH	CONSERVE
Elham: East Kent Downs	<i>"A large-scale landscape. Densely wooded ridges to the west with conifer plantations and ancient woodland. Intensively cultivated plateau to east with small woodlands on the valley sides. Hedgerow trees and scattered dwellings."</i>	GOOD	HIGH	CONSERVE
Alkham: East Kent Downs	<i>"Long ridges and isolated valleys, formerly an ancient unenclosed landscape. Some woodland of high nature conservation value on steeper valley slopes. Coastal downs, open hill-top fields, wild with pockets of scrub."</i>	MODERATE	MODERATE	CONSERVE and CREATE
Folkestone Outskirts: Postling Vale	In views from the steep enclosed coombes of the North Downs scarp slope just north of Folkestone, the M20 and Channel Tunnel terminal dominate.	POOR	MODERATE	RESTORE and CREATE

LAK Character Areas within this assessment's study area, but outside of the site	Key characteristics (relevant to this assessment)	Condition	Sensitivity	Strategy and Actions
Stowting: Postling Vale	<p>Comprising of two halves. The first is an area of relatively open, arable fields surrounded by small shaws or overgrown hedges on the lower slopes of the North Downs scarp. Grassed upper slopes with occasional hilltop blocks of deciduous woodland “draw the eye away from scarp-foot developments such as the motorways, and provide a means of orientation in the landscape”</p> <p>The gradual ribbon of development and pockets of suburbanisation along the scarp foot including the M20 motorway and railway line not only dominate but also sever the landscape character assessment in two.</p> <p>The flatter arable farmed landscape of the second area, around Pedlinge, is broken up by large blocks of woodland. Further south steep stream valleys, small woodlands and pasture surround the outskirts of Hythe.</p>	<p>VERY GOOD: a “coherent pattern of elements with very few detracting features. Rural heritage features - woodland, hedges, small villages - are in good condition, built development in general has a moderate positive impact on the area. The landscape has strong cultural links.”</p>	<p>VERY HIGH: “The landform is a dominant element of the view and visibility is very high over the open landscape. There is an historic time depth to landscape elements and landscape pattern, although field boundaries are becoming indistinct. ...</p> <p>Built form is a less distinct element of the landscape. This is considered to be a highly sensitive landscape.”</p>	<p>CONSERVE: “Conserve views of the dominant landform.”</p>
Saltwood Postling Vale	<p>A “intimate and enclosed” character area within the wider Postling Vale zone, created by the “significant amount of deciduous woodland, especially along the valley sides, and ... dense hedges and hedgerow trees” which limits visibility.</p>	<p>MODERATE</p>	<p>HIGH</p>	<p>CONSERVE and RESTORE</p>
Brabourne Vale	<p>An area of gently sloping landform, mixed farmland, small hamlets and farmsteads, small woodlands and larger plantations with the sometime bushy hedgerows, which “give parts of the area a feel similar to the Low Weald”.</p>	<p>VERY GOOD</p>	<p>MODERATE: “Visibility is very low throughout”</p>	<p>CONSERVE and REINFORCE</p>

LAK Character Areas within this assessment's study area, but outside of the site	Key characteristics (relevant to this assessment)	Condition	Sensitivity	Strategy and Actions
Brabourne Lees Mixed Farmland	An area of gentle undulating mixed farmland with medium sized woodlands. From higher parts there are tremendous views to the North Downs to the north.	VERY GOOD	MODERATE: <i>"Views are intermittent over an unremarkable landform, therefore visibility is low."</i>	CONSERVE and REINFORCE
Mersham Farmland	An undulating area of open arable fields and small-scale pastoral mixed farmland, with small copses and gappy hedgerows. The area is enclosed by the M20 to the north, railway to the south, and the Ashford ring-road to the west.	VERY POOR	MODERATE	RESTORE and CREATE
Bethersden Farmland	A flat, open arable landscape, which has a remote, unpopulated feel.	VERY GOOD	MODERATE	CONSERVE and REINFORCE
Old Romney Shoreline Wooded Farmlands	A flat, and occasionally gently undulating agricultural landscape with distinctive ridges and valleys, dropping down to Romney Marsh, with a remote feel. The area is populated with large broadleaf or mixed woodlands, a small -scale pattern of pastoral fields, and scattered settlement.	VERY GOOD	MODERATE	CONSERVE and REINFORCE
Romney Marsh Settlements	A distinctive flat lowland of scattered farmsteads and small villages, with varied tree lines enclosing fields. To the north the area is contained by the old cliff line. Views are distantly enclosed by the cliff line and by tree-lined horizons. The settlements compact, small and sheltered from view by groups of trees.	GOOD: <i>"The landscape elements are unified and there are few detractors in the view."</i>	VERY HIGH: <i>"This area is comparatively rural and has fewer recent features than some of the marsh areas. Visibility is very high over the dominant landform."</i>	CONSERVE: <i>"Conserve open views."</i>

LAK Character Areas within this assessment's study area, but outside of the site	Key characteristics (relevant to this assessment)	Condition	Sensitivity	Strategy and Actions
Romney Marsh Mixed Farmlands	A flat, open agricultural landscape with long views, in which settlements are enclosed by trees.	MODERATE: <i>"The landscape has a unified pattern of elements, but with some visual detractors; transmission towers and agricultural buildings are highly visible in the open landscape."</i>	HIGH: <i>"Visibility is very high over the dominant landform, resulting in the high sensitivity of the landscape."</i>	CONSERVE and RESTORE:
Romney Marsh Lympe	A flat remote agricultural landscape with scrubby, windblown trees around settlements. <i>"The flatness and remote qualities of the Marsh make it very vulnerable to the intrusive effects of development, which are often worsened by inappropriate measures to conceal the damage, such as conifer shelterbelts. ... The scarp is highly visible from the flat marsh, forming a long hillside of rough grassland, dotted with scrub. Several large deciduous woodlands break up the sweep of the landform, being more characteristic in the west around Aldington."</i>	MODERATE: <i>"The flat and remote landscape has a coherent pattern of elements but with many visual detractors, although some of these are small scale, such as temporary buildings. The long views permit the intrusion of large scale elements such as lines of pylons."</i>	MODERATE: <i>"The flat and remote landscape has a coherent pattern of elements but with many visual detractors, although some of these are small scale, such as temporary buildings. The long views permit the intrusion of large scale elements such as lines of pylons."</i>	CONSERVE and CREATE:
Romney Coast	A linear belt of 20th century development behind the sometimes visually dominant sea defences, containing a mixture of occasional historic structures, tourist sites and dunes.	MODERATE: <i>"There are many visual detractors which include a proliferation of overhead cables, general road furniture and fencing, and unsympathetic commercial development."</i>	HIGH: <i>"The sense of place is considered to be moderate. Visibility is very high..."</i>	CONSERVE and RESTORE:

LAK Character Areas within this assessment's study area, but outside of the site	Key characteristics (relevant to this assessment)	Condition	Sensitivity	Strategy and Actions
Aldington Lympne	At the western end of the Hythe Escarpment the landform become gentler and rounded, with deciduous woodland dominating the scarp. The elements of suburbanisation associated with the substantial properties which are scattered across this area diminish its otherwise wild, bleak appearance.	VERY GOOD: <i>"This is a strongly unified, simple landscape with very few visual detractors, dominated by heavily-wooded ridges."</i>	HIGH: <i>"Although on a dominant scarp landscape, views are well enclosed by woodland, therefore the visibility is limited to 'moderate' within the area itself. ... Other characteristic elements are more recent, such as the ridgeline residential development."</i>	CONSERVE: <i>"Conserve the limited influence of built development within the area and in views of the scarp."</i>
Hythe escarpment: Lympne	A sandstone scarp with rough grassland, remnant hedgerows, and unimproved agricultural grasslands with scrub at the base of the slopes. The area is also characterised by the extensive array of buildings, fences and paths of the Port Lympne Wildlife Park, the settlement around Lympne Castle and St Stephen's Church, the buildings of Lympne Place and other substantial properties – mainly upon the upper slopes. <i>"The simplicity and integrity of this landscape and its high visibility from much of Romney Marsh mean that any developments or changes which take place on its slopes will have major effects not only on the immediate landscape but also on the wider setting of Romney Marsh."</i>	GOOD: <i>"This is not an entirely traditional landscape; the view of agricultural grasslands is occasionally interrupted by wire fencing and inappropriate planting. Prominent castles and extensive houses have a high positive impact on the area."</i>	VERY HIGH: <i>"The scarp is a dominant landform, particularly as it looks over the wide expanse of coastal marsh. The limited tree cover does not curtail the high visibility within and around the landscape."</i>	CONSERVE: <i>"Conserve the setting of ancient/historic sites and monuments by ensuring long views to sites, but retaining the element of inaccessibility."</i>
The Stour – Stour Gap	<i>"Low-lying flat or gentle undulating landscape with... open arable farmland enclosed by Downs to the north."</i>	VERY POOR:	LOW:	CREATE:
The Stour – Stour Valley	A flat, low-lying valley of mixed farmland with sparse settlement and long views to the North Downs.	POOR:	MODERATE:	RESTORE and CREATE:

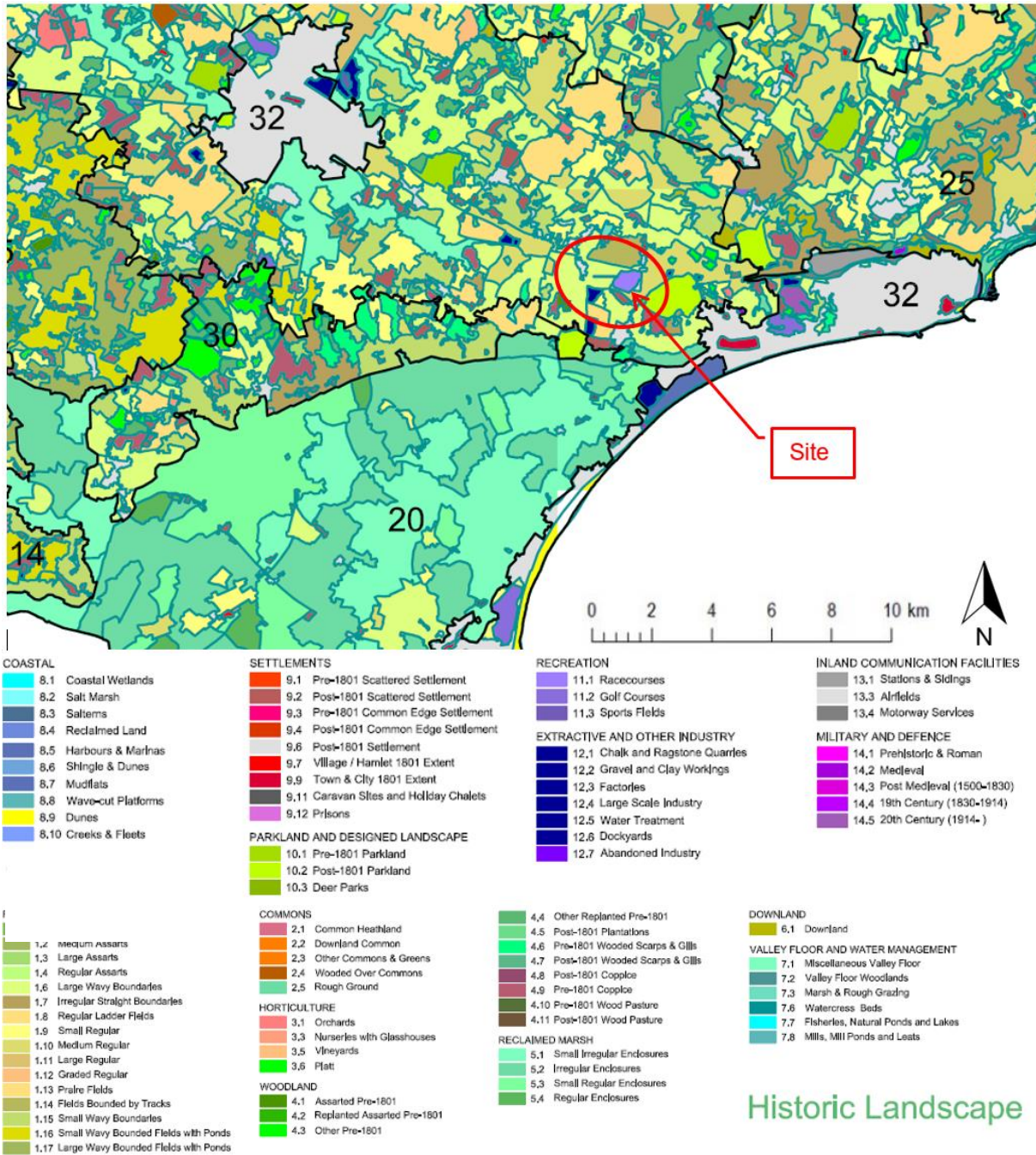
LAK Character Areas within this assessment's study area, but outside of the site	Key characteristics (relevant to this assessment)	Condition	Sensitivity	Strategy and Actions
Hampton: Stour Valley	This gently undulating landscape contains considerable woodland and is characterised by the backdrop of wooded North Downs scarp.	GOOD: <i>"There are few visual detractors."</i>	HIGH: <i>"Visibility is moderate as views are intermittent over the apparent landform."</i>	CONSERVE:
Wye: Stour Valley	A wide, flat floodplain with lines of trees and overgrown hedges, and with steep slopes in east with rough grass, scrub and deciduous woodland.	VERY POOR: <i>"an incoherent landscape and there are several detractors, especially the railway line and the post-war linear development of existing villages"</i>	MODERATE: <i>"Landform is apparent and tree cover is intermittent, giving a moderate visibility."</i>	RESTORE and CREATE:

Historic Landscape Character

Kent Historic Landscape Characterisation, 2001

- 12.3.37 KCC and HE published the Kent Historic Landscape Characterisation (Ref 12.32) (KHLC) in 2001. Paragraph 1.8 states that the purpose of the study was to recognise *“the ways in which the present physical landscape reflects how people have exploited, changed and adapted to the physical environment through time, with respect to different social, economic, technological and cultural factors.”* The authors intend the document to be used to *“enhance the formulation of development plans, structural planning programmes, development control and conservation activities.”* It was prepared *“in conjunction with the complimentary county-wide landscape assessment”*, i.e. the LAK that was finalised a few years later.
- 12.3.38 Whilst there is greater reference to the KHLC within Chapter 9: Cultural Heritage of the ES, an appreciation of the time depth element of the landscape is a necessary part of the understanding of the landscape character of an area.
- 12.3.39 The extract of the KHLC shown in Image 12-7 displays the historic landscape character areas and historic landscape types (HLTs) in and around the site.
- 12.3.40 The site lies within KHLC character area 31: Central Valley Area. This is described in volume 1 of the KHLC as: *“dominated by regular and wavy bounded fields (HLTs 1.9–1.11, 1.6, 1.15) with a considerable subsidiary element of ‘prairie’ fields (HLT 1.13), all of which indicate extensive agricultural activity over the last 200+ years.”*

Image 12-7 Extract from the Kent Historic Landscape Characterisation, 2001: Figure 3.1 Historic Landscape Character Areas and Historic Landscape Types and legend.



12.3.41 The HLTs that have been recorded in the site are:

- 1.6 - Medium to Large Fields with Wavy Boundaries: This enclosure type is assumed to relate to the late medieval or 17th/18th-century informal enclosure, predating the period when boundaries were carefully surveyed. There may be exceptions. Enclosures are typified by their regular shape (usually rectilinear) and wavy boundaries. Size is variable. This type can occur throughout the county, but is typical of relatively open areas on the chalk, coastal strip and open clay and river valleys.
- 1.9 - Small Regular Fields with Straight Boundaries: These enclosures were typically formed by 19th and 20th-century enclosure. Some enclosures of this type may have resulted from straightening of wavy bounded fields. Small regular enclosures that are typically rectangular with straight surveyed boundaries. These enclosures are to be found in lowland and coastal areas generally dominated by small fields.
- 1.10 - Medium Regular Fields with Straight Boundaries: This type of field was typically created by 19th and 20th-century enclosure of downland and low lying areas. This type can also include enclosures whose boundaries have been straightened. These enclosures are generally rectangular with straight surveyed boundaries and can form a regular grid like field pattern. Located throughout the county.
- 1.13 - Prairie Fields: These enclosures have generally been created by 20th-century boundary loss of 19th-century or earlier enclosures. These enclosures are very large with edge lengths often well over 1000m. This type is found across the northern half of the county with isolated areas in the southern areas.
- 9.2 - Post 1801 Scattered Settlement: Scattered properties within a pattern of very small rectilinear field enclosures or gardens. ... areas are likely to be a 19th and 20th-century continuation of the type of rural settlement represented by HLT 9.1 [*Pre-1801 Scattered Settlement*]. Seen on OS 1:25,000 and 1:10,000 as scattered settlements with very small rectilinear enclosures. Mainly associated with all enclosure and woodland types.
- 9.6 - Post 1801 Settlement: Settlement which has developed since 1801. Includes expansion of hamlets, villages, towns and cities as well as new settlement groups. Not present on OS 1801 1" map. Main urban areas are predominant, but a high proportion of older settlements have some post-1801 settlement. Associated with other nucleated settlement types (HLT 9.7 Hamlet or Village).
- 11.1 – Racecourses: Racecourse or gallops for horses. Identified on OS 1:25,000 and 1:10,000 maps as an open area with a round or oval track and associated buildings. Also named as racecourses or gallops. Not common. Mainly on or adjacent to the chalk.
- 12.1 - Active and Disused Chalk and Stone Quarries: Identified on OS 1:25,000 and 1:10,000 by name and by map symbols for 'other pits'. Disused pits and quarries are often identified by map symbols for refuse areas. ... occur on the greensand.

12.3.42 In summary, the site displays evidence of a mixture of field sizes following enclosure in the 19th century, or earlier. Most fieldscapes are of a rectilinear nature, but the larger ones having more irregular boundaries. The KHLC recognises the scattered settlement pattern that has existed through this area, and the expansion of hamlets

and villages. It also identifies the use of the parts of the site through time as a racecourse, airfield, quarry, and industrial complex.

Folkestone & Hythe District Council Heritage Strategy, 2019

- 12.3.43 The F&HDC Heritage Strategy (Ref 12.33) is an evidence base document prepared for the F&HDC-P&PLP and is also intended to provide information for planning applications. It *“sets out positive objectives and priorities to ensure the district’s heritage assets provide a unique opportunity for future place-making, guiding and stimulating regeneration and making significant contributions to recreation, tourism, health and education”*.

Local Level Landscape Character Assessment

Shepway District High Level Landscape Appraisal

- 12.3.44 F&HDC (formerly Shepway District Council) prepared a number of documents as part of the 2017 Strategic Growth Options Study. One of the documents prepared was the SDC-HLLA.

- 12.3.45 The purpose of the document, as outlined in its introduction, was to:

“inform a strategic review of the likely relative impacts of strategic level development in various locations. It is intended that the HLLA will inform opportunities and constraints for growth with regard to landscape character and visual amenity, alongside other key evidence based documents, as part of a partial review of the Council’s adopted Core Strategy Local Plan.”

- 12.3.46 The specific focus for the study was “identifying the relative sensitivity of the landscapes within Shepway District to strategic level development” within them.

- 12.3.47 Strategic level development is defined within the SDC-HLLA as “residential development of at least 250 houses at an assumed density of 20 units per hectare (including land for essential infrastructure).” To affirm the impartiality of the study the document highlights that “specific development sites are not considered in this HLLA, and proposals or recommendations for development land are not made or implied.”

- 12.3.48 The study divides the District (including its urban areas) into twenty-six LCAs (see Figure 12.7) and appraises each on its:

- landscape value (in accordance with those aspects contained within Box 5.1 of GLVIA3); and
- susceptibility to change (in accordance with the definitions contained with GLVIA3) should strategic development be located within.

- 12.3.49 When judgements on these were combined they determined the sensitivity of each LCA as either:

- ‘High’: High sensitivity landscape considered to be least suitable for strategic level development in terms of likely impact on landscape character and visual amenity;
- ‘Medium’: Medium sensitivity landscape where impact on landscape character and visual amenity would not necessarily be an obstacle to strategic level development, and where suitability is likely to be determined by other sustainability or strategic environmental considerations; and
- ‘Low’: Low sensitivity landscape considered to be most suitable for strategic level development in terms of likely impact on landscape character and visual amenity.

- 12.3.50 The methodology and the findings of the appraisal were consulted upon, for discussion and agreement, with F&HDC and invited stakeholders including AONB

Unit and NE. The latest NE guidance for the preparation of LCAs, the NE-ALCA, was used to develop the methodology. Figure 12.7 identifies that the site is contained within one LCA within the SDC-HLLA (SDC-HLLA 11 – Lympne), is bounded by a further two (SDC-HLLA 10 – M20 and HS1 Corridor, and SDC-HLLA 12 – Brockhill), and a further nine (SCD-HLLA LCA 01: Elmsted Valley, SCD-HLLA LCA 03: Elham Valley, SDC-05: Postling Vale, SDC-06: Stanford, SDC-07: Tolsford Hill, SDC-08: North Downs Ridge, SDC-09: Sellindge, SDC-13: Greensand Ridge, and SDC-21: Romney Marsh Proper Farmlands) lie within the study area and ZTV of the proposed Development. The key characteristics of each area, that are relevant to this assessment, and their 'value', 'susceptibility' to strategic scale development, and 'sensitivity', are set out in Table 12-18

Table 12-18 Summary of the findings of the Shepway District High Level Landscape Appraisal (2017), for LCAs within this assessment's study area and ZTV

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
SCD-HLLA LCA 01: Elmsted Valley	<ul style="list-style-type: none"> - Intimate and remote landscape • Rolling landscape of narrow valleys; • Medium-large scale arable landscape; • Scattered and isolated settlement of small farms and hamlets; • Narrow lanes; and • Sense of enclosure 	<p>MEDIUM/HIGH</p> <p>Landscape Quality (Condition): The LCA is in a fair condition, hedgerows are occasionally gappy but generally being well-managed</p> <p>Scenic Quality: The LCA is considered to be of a high scenic quality, as recognised by its designation as an AONB.</p> <p>Rarity: The LCA contains a substantial amount of Ancient Woodland but few other rare characteristics.</p> <p>Representativeness: The LCA is considered to be highly representative of the landscape character of NCA 119: North Downs.</p> <p>Conservation Interests: The LCA includes a number of listed buildings, as well as a scheduled monument.</p> <p>Recreation Value: The LCA is highly valued for recreation and includes a network of public rights of way in the AONB.</p> <p>Perceptual Aspects: The LCA is considered to have a remote and tranquil character. Its designation as an AONB recognises its nationally important aesthetic qualities.</p> <p>Associations: The LCA has some historical associations evident in the landscape history in elements including the Roman road. The AONB Management Plan notes that the landscape has been 'an inspiration to artists, scientists and leaders, from Shakespeare to Samuel Palmer and Darwin to Churchill'.</p>	HIGH	HIGH

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
<p>SCD-HLLA LCA 03: Elham Valley</p>	<ul style="list-style-type: none"> • Predominantly agricultural landscape of mixed arable and pasture; • Strongly rural character; • Village settlements; and Scattered farmsteads; • Narrow winding lanes; • Roads and fields generally lined with hedgerows and occasionally tree belts; • Dispersed small-scale woodland blocks; • Ancient Woodland; • High voltage pylons; and • Tranquil and attractive character. 	<p>HIGH/MEDIUM</p> <p>Landscape Quality (Condition): The LCA is in a fair condition, hedgerows are occasionally gappy but generally being well-managed.</p> <p>Scenic Quality: The LCA is considered to be of a high scenic quality, as recognised by its designation as an AONB.</p> <p>Rarity: The LCA contains a substantial amount of Ancient Woodland but few other rare characteristics.</p> <p>Representativeness: The LCA is considered to be highly representative of the landscape character of NCA 119: North Downs.</p> <p>Conservation Interests: The LCA includes Elham Conservation Area, a substantial number of listed buildings dispersed across the area, several scheduled monuments, and a SSSI.</p> <p>Recreation Value: The LCA is valued for recreation and includes a good network of public rights of way that includes the Elham Valley Way Recreational Trail. Valley walks around this part of the AONB are highly valued and popular.</p> <p>Perceptual Aspects: The LCA is considered to have a tranquil character with a strong sense of place. Its designation as an AONB recognises its nationally important aesthetic qualities.</p> <p>Associations: The AONB Management Plan notes that the landscape has been ‘an inspiration to artists, scientists and leaders, from</p>	<p>HIGH</p>	<p>HIGH</p>

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
SCD-HLLA LCA 05: Postling Vale	<ul style="list-style-type: none"> • North Downs Ridge scarp; • Far-reaching attractive views from the scarp; • Species rich grassland along scarp; • Large-scale arable fields bounded by patchy hedgerows and tree belts; • Small-scale historic villages; • Dispersed farmsteads; • Remote character; and • Tranquillity affected by M20 motorway to south. 	<p>HIGH</p> <p>Landscape Quality (Condition): The LCA is considered to be in a fair condition, with intact elements but some limited signs of good management of hedgerows.</p> <p>Scenic Quality: The LCA is considered to be of a high scenic quality, as recognised by its designation as an AONB.</p> <p>Rarity: The LCA has rare characteristics including Ancient Woodland, species-rich grassland, and far-reaching views.</p> <p>Representativeness: The LCA is considered to be highly representative of the landscape character of NCA 119: North Downs.</p> <p>Conservation Interests: The LCA includes a number of dispersed clusters of listed buildings and several scheduled monuments.</p> <p>Recreation Value: The LCA has a comprehensive network of public rights of way and includes the North Downs Way National Trail which follows the top of the scarp.</p> <p>Perceptual Aspects: The LCA is considered to have a remote character. Its designation as an AONB recognises its nationally important aesthetic qualities.</p> <p>Associations: The AONB Management Plan notes that the landscape has been ‘an inspiration to artists, scientists and leaders, from Shakespeare to Samuel Palmer and Darwin to Churchill’.</p>	HIGH	HIGH

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
SCD-HLLA LCA 06: Stanford	<ul style="list-style-type: none"> • Gently undulating; • Large-scale open arable landscape; • Some smaller grazed paddocks; • Gappy hedgerows, fencelines or open fields; • North Downs Ridge scarp prominent to the north; • Open views of the motorway corridor; • M20 motorway a substantial visual and tranquillity detractor; and • Line of prominent high voltage pylons. 	<p>MEDIUM</p> <p>Landscape Quality (Condition): The LCA is considered to be in a fair condition, with intact elements but some limited signs of good management of hedgerows.</p> <p>Scenic Quality: There are prominent visual detractors within the LCA, including the M20 and high voltage pylons. However, the LCA is part of the wider open landscape setting of the Kent Downs AONB, with some attractive views of the North Downs Ridge to the north, and is therefore considered to have a moderate scenic quality.</p> <p>Rarity: The LCA contains some Ancient Woodland, but few other rare characteristics.</p> <p>Representativeness: The LCA is considered to display some of the characteristics of NCA 120: Wealden Greensand.</p> <p>Conservation Interests: The LCA has a few listed buildings including the locally distinctive Stanford Windmill.</p> <p>Recreation Value: The LCA is locally valued for recreation and has a comprehensive network of public rights of way.</p> <p>Perceptual Aspects: The LCA is greatly influenced by the open nature of the M20 which substantially affects tranquillity and its connection with the landscape to the south.</p> <p>Associations: The LCA has no known historical or cultural associations.</p>	<p>MEDIUM</p> <p>proposed Development in this area would potentially be a prominent feature in the wider landscape setting of the Kent Downs AONB.</p>	<p>MEDIUM</p>

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
<p>SCD-HLLA LCA 07: Tolsford Hill</p>	<ul style="list-style-type: none"> • Prominent steep-sided hills; • Mixed agricultural landscape; • Small village settlements; • Large areas of woodland, including Ancient Woodland; • Far-reaching panoramic views from Tolsford Hill; • Prominent telecommunications mast; • M20 motorway and Channel Tunnel Terminal detracting visual and tranquillity features; and • Rugged, wild landscape. 	<p>HIGH</p> <p>Landscape Quality (Condition): The LCA is in a good condition, with intact elements that are generally well-managed</p> <p>Scenic Quality: The LCA is considered to be of a high scenic quality, as recognised by its designation as an AONB</p> <p>Rarity: The LCA includes large areas of Ancient Woodland, and the landform of Tolsford Hill is considered to be a rare characteristic.</p> <p>Representativeness: The LCA is considered to be highly representative of the landscape character of NCA 119: North Downs</p> <p>Conservation Interests: The LCA includes a number of listed buildings and scheduled monuments, and a large SSSI</p> <p>Recreation Value: The LCA is highly valued for recreation and includes a network of public rights of way, including the North Downs Way National Trail</p> <p>Perceptual Aspects: The LCA is considered to have a rugged and wild character despite its proximity to the M20 and Channel Tunnel Terminal. Its designation as an AONB recognises its nationally important aesthetic qualities</p> <p>Associations: The AONB Management Plan notes that the landscape has been ‘an inspiration to artists, scientists and leaders, from Shakespeare to Samuel Palmer and Darwin to Churchill’.</p>	<p>HIGH</p>	<p>HIGH</p>

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
SCD-HLLA LCA 08: North Downs Ridge	<ul style="list-style-type: none"> • Prominent scarp slope; • Species rich grassland; • Woodland blocks along foot of scarp slope; • Limited settlement; • Pastoral fields in the west; • Far-reaching panoramic views; and • Views south dominated by development including major transport infrastructure. 	<p>HIGH</p> <p>Landscape Quality (Condition): The LCA is in a good condition, with intact elements that are generally well-managed</p> <p>Scenic Quality: Despite the prominent visual detractors to the south, the LCA is considered to be of a high scenic quality, as recognised by its designation as an AONB.</p> <p>Rarity: The LCA has several rare elements including views, landform and grassland habitats</p> <p>Representativeness: The LCA is considered to be highly representative of the landscape character of NCA 119: North Downs</p> <p>Conservation Interests: The LCA includes a number of scheduled monuments, as well as internationally important conservation designations.</p> <p>Recreation Value: The LCA is highly valued for recreation and includes a network of public rights of way, including the North Downs Way National Trail.</p> <p>Perceptual Aspects: The LCA is considered to have a rugged and wild character despite its proximity to the M20 and Channel Tunnel Terminal. The LCA is important to the setting of Folkestone. Its designation as an AONB recognises its nationally important aesthetic qualities.</p> <p>Associations: The AONB Management Plan notes that the landscape has been ‘an inspiration to artists, scientists and leaders, from Shakespeare to Samuel Palmer and Darwin to Churchill’</p>	HIGH	HIGH

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
SCD-HLLA LCA 09: Sellindge	<ul style="list-style-type: none"> • Gently undulating; • Dispersed linear settlement alongside roads; • Mixed agricultural landscape • Moderate tree cover from hedgerow tree belts; • Low tranquillity; and • Sense of enclosure. 	<p>MEDIUM</p> <p>Landscape Quality (Condition): The LCA is in a fair condition, with intact elements and signs of good management.</p> <p>Scenic Quality: The LCA is part of the wider landscape setting of the Kent Downs AONB, with some attractive views of the North Downs Ridge to the north, and is therefore considered to have a moderate scenic quality.</p> <p>Rarity: The LCA includes a small amount of Ancient Woodland, but very few other rare characteristics.</p> <p>Representativeness: The LCA is considered to display some of the characteristics of NCA 120: Wealden Greensand.</p> <p>Conservation Interests: The LCA has a number of listed buildings, a scheduled monument, and a SSSI.</p> <p>Recreation Value: The LCA is locally valued for recreation and has a good network of public rights of way</p> <p>Perceptual Aspects: The LCA is partially influenced by the noise of the M20 which affects tranquillity and its connection with the landscape to the south. Parts of the LCA around Stone Hill have a historic and remote, enclosed character.</p> <p>Associations: The LCA has no known historical or cultural associations.</p>	MEDIUM	MEDIUM

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
SCD-HLLA LCA 10: M20 and HS1 Corridor	<ul style="list-style-type: none"> • Major transport corridor; • Strong linear development; • M20 motorway; • High Speed 1 railway line; • Intermittent tree belts; • Severing feature; and • Limited tranquillity. 	<p>LOW</p> <p>Landscape Quality (Condition): The LCA is considered to be in a fair condition, with landscaping associated with the corridors under management.</p> <p>Scenic Quality: The LCA is considered to be of a low scenic quality that detracts from surrounding views.</p> <p>Rarity: The Channel Tunnel Terminal is considered to be a rare feature within the UK, however, the LCA does not contain any rare landscape elements.</p> <p>Representativeness: The LCA displays few or none of the characteristics of NCA 120: Wealden Greensand.</p> <p>Conservation Interests: The LCA has no conservation interests.</p> <p>Recreation Value: The LCA is not valued for recreation.</p> <p>Perceptual Aspects: Tranquillity is substantially reduced by the M20 and HS1 corridors.</p> <p>Associations: The LCA has no known historical or cultural associations.</p>	LOW	LOW

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
<p>SCD-HLLA LCA 11: Lympne</p>	<ul style="list-style-type: none"> • Undulating landscape with a northerly aspect; • Predominantly arable farmland; • Medium-large scale fields; • Fields bounded by hedgerows, fencelines and tree belts; • Village settlements; • Folkestone Race Course and Lympne Industrial Park noticeable features; and • Views of the North Downs Ridge. 	<p>MEDIUM/LOW</p> <p>Landscape Quality (Condition): The LCA is considered to be in fair condition with signs of good management practices. There are areas where hedgerows are gappy alongside the A20.</p> <p>Scenic Quality: The LCA is part of the wider landscape setting of the Kent Downs AONB, with some attractive views towards, and from, the North Downs Ridge. It is considered to have a moderate scenic quality.</p> <p>Rarity: The LCA includes a small amount of Ancient Woodland, but very few other rare characteristics.</p> <p>Representativeness: The LCA is considered to be highly representative of the characteristics of NCA 120: Wealden Greensand.</p> <p>Conservation Interests: The LCA has a number of listed buildings, a scheduled monument, and a SSSI.</p> <p>Recreation Value: The LCA is lacking in public rights of way and public open space.</p> <p>Perceptual Aspects: The LCA is partially influenced by the noise of the M20 which slightly reduces tranquillity and its connection with the landscape to the north.</p> <p>Associations: The LCA has no known historical or cultural associations.</p>	<p>MEDIUM</p> <p>Depending on the siting of development:</p> <ul style="list-style-type: none"> - the LCA is potentially capable of accommodating development without the loss of landscape elements or characteristics which add value to the area. - in relation to existing development, it could potentially be a prominent feature in the wider landscape setting of the Kent Downs AONB, however there is also potential for more discreet siting. 	<p>MEDIUM</p>

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
SCD-HLLA LCA 12: Brockhill	<ul style="list-style-type: none"> • Varied landform including plateau and narrow twisting valley; • Substantial areas of woodland, much of which is Ancient Woodland; • Mixed farmland; • Limited settlement; and • Strong sense of enclosure. 	<p>HIGH</p> <p>Landscape Quality (Condition): The LCA is in a good condition, with intact elements that are generally well-managed.</p> <p>Scenic Quality: The LCA is considered to be of a high scenic quality, as recognised by its designation as an AONB.</p> <p>Rarity: The LCA includes a large quantity of Ancient Woodland, but few other rare landscape characteristics.</p> <p>Representativeness: The LCA is considered to be highly representative of the landscape character of NCA 119: North Downs.</p> <p>Conservation Interests: The LCA includes a few listed buildings, a Registered Park and Garden of Historic Interest (RPGHI), and some large areas of Ancient Woodland.</p> <p>Recreation Value: The LCA is valued for recreation and includes a network of public rights of way, including the Saxon Shore Way, a long distance recreational trail. Brockhill Country Park is locally valued.</p> <p>Perceptual Aspects: The LCA is considered to have a generally tranquil character. Its designation as an AONB recognises its nationally important aesthetic qualities.</p> <p>Associations: The AONB Management Plan notes that the landscape has been ‘an inspiration to artists, scientists and leaders, from Shakespeare to Samuel Palmer and Darwin to Churchill’.</p>	HIGH	HIGH

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
<p>SCD-HLLA LCA 13: Greensand Ridge</p>	<ul style="list-style-type: none"> • Prominent scarp landform; • Rough species-rich grassland; • Scrub and areas of woodland, mostly in the west of the LCA; • Limited settlement; • Significant historic fortifications including the Royal Military Canal; • Arable and pastoral farmland along top of scarp; • Panoramic, far-reaching views across Romney Marsh to the south; and • Open and exposed. 	<p>HIGH</p> <p>Landscape Quality (Condition): The LCA is in a good condition with signs of good management practices.</p> <p>Scenic Quality: The LCA is considered to be of a high scenic quality, as recognised by its designation as an AONB.</p> <p>Rarity: The LCA has several rare elements including views, landform and grassland habitats.</p> <p>Representativeness: The LCA is considered to be highly representative of the landscape character of NCA 120: Wealden Greensand.</p> <p>Conservation Interests: The LCA includes a number of listed buildings and scheduled monuments (including the Royal Military Canal), a RPGHI, and a SSSI.</p> <p>Recreation Value: The LCA is highly valued for recreation and includes a network of public rights of way, including the Saxon Shore Way and Royal Military Canal Path, both long distance recreational trails.</p> <p>Perceptual Aspects: The LCA is considered to have a generally tranquil and wild character. Its designation as an AONB recognises its nationally important aesthetic qualities.</p> <p>Associations: The LCA has historical associations evident in remnant features in the landscape today. The AONB Management Plan notes that the landscape has been ‘an inspiration to artists, scientists and leaders, from Shakespeare to Samuel Palmer and Darwin to Churchill’.</p>	<p>HIGH</p>	<p>HIGH</p>

Character Area	Key Characteristics	Value (using terminology referred to in SDC-HLLA)	Susceptibility (using terminology referred to in SDC-HLLA)	Sensitivity (using terminology referred to in SDC-HLLA)
<p>SCD-HLLA LCA 21: Romney Marsh Proper Farmlands</p>	<ul style="list-style-type: none"> • Flat, open landscape; • Low-lying; • Agricultural landscape comprising predominantly arable land; • Fields bounded by network of winding ditches; • Dispersed nucleated villages; • Scattered farmsteads; • Narrow winding roads; • Long distance views, including of the dramatic scarp to the north; • Churches are prominent historical features; and • Limited tree cover, predominantly around settlement. 	<p>HIGH</p> <p>Landscape Quality (Condition): The LCA is considered to be in a good condition and well managed.</p> <p>Scenic Quality: The LCA is considered to be of a moderate scenic quality, with some attractive views across the Romney Marshes and towards the Greensand Ridge, high voltage pylons form localised detractors.</p> <p>Rarity: The flat agricultural landscape defined almost exclusively by ditches is considered to be a rare and distinctive characteristic within England.</p> <p>Representativeness: The LCA is considered to be highly representative of the key characteristics of NCA 123: Romney Marshes.</p> <p>Conservation Interests: The LCA includes Newchurch Conservation Area, and has a number of listed buildings and scheduled monuments, including the Royal Military Canal.</p> <p>Recreation Value: The LCA has a strong network of public rights of way between settlements, and National Cycle Network Route 2, which is a major long distance trail. The Royal Military Canal Path is a long distance recreational trail alongside the Royal Military Canal in the north of the area.</p> <p>Perceptual Aspects: The LCA is tranquil and has a sense of remoteness and a strong sense of place.</p> <p>Associations: The Romney Marsh landscape has a number of historical and cultural associations with links to past invasions and wars, literary authors, and smuggling.</p>	<p>MEDIUM/HIGH</p>	<p>HIGH</p>

The Ashford Landscape Character Supplementary Planning Document

12.3.51 ABC published the ABC-LC SPD in 2011. It brought together two landscape character assessments that had previously been carried out for two areas of the Borough to provide a comprehensive study. These were the:

- ‘*Ashford Landscape Character Study*’ (Ref 12.34) (ALCS) which assessed the urban fringe of Ashford;
- ‘*Ashford Landscape Character Assessment*’ (Ref 12.35) (ALCA) which assessed the remaining rural parts of the Borough surrounding this, that are outside of AONB designation.

12.3.52 Paragraph 3.14 of the ABC-LC SPD states that for “*the purpose of implementing local landscape character policies, the areas of land designated as AONB in the Borough will be treated as separate landscape character areas and guidance material on these AONBs should be obtained from the relevant AONB Unit*” such as the AONB-MP. To provide a level of consistency the ABC-LC SPD provides a description of the key characteristics of each of the LCAs contained in the two documents. Those that are relevant to this assessment are set out in Table 12-19 and shown in Figure 12.7.

Table 12-19 Summary of the findings of the Ashford Landscape Character SPD (2011), for LCAs whose extents lie fully outside of the site but within the study area

Character Area	Key Characteristics
ABC-10 East Stour Valley	<ul style="list-style-type: none"> • Well vegetated East Stour River cuts through valley with land rising to Bested Hill in the north • Mosaic like pastoral field pattern • Mixed and broadleaf woodland blocks • Mature isolated oak trees within pasture • Narrow lanes follow the undulations of the landscape, often hedgerow and ditch lined • Some recent individual housing sporadically located along the lanes • Scattered farmsteads set back from the lanes
ABC-14 Bonnington Wooded Farmlands	<ul style="list-style-type: none"> • Undulating landform which forms part of the immediate foreground to the Kent Downs AONB which rises to the east • Mixed farmland with small fields • Deciduous and evergreen enclosing woodland blocks • Native hedgerows with large standard oak trees • Isolated oaks trees set within pasture • Strong sense of enclosure • Equestrian grazing and land-use • Narrow and hedge lined roads • The non-nucleic settlement of Bonnington with traditional houses and stone farm buildings • Recent housing development arranged around closes
ABC-25 Aldington Ridgeline	<ul style="list-style-type: none"> • High ridgeline topography • North Downs frame the views to the north • Mixed farmland with enclosed pasture immediately surrounding settled areas • Loss of historic field pattern where land is intensively farmed • Small woodland copses, tree belts and native hedgerows

Character Area	Key Characteristics
	<ul style="list-style-type: none"> • Very distinctive ragstone church and remains of Archbishops Palace isolated from main settlement of Aldington • Strong use of ragstone and locally distinctive chequered brick • Farm building conversions • Recent development within Aldington situated along a Roman road
<p>ABC-26 Brabourne Lees Hilly Farmlands</p>	<ul style="list-style-type: none"> • Hilly topography • Strong sense of enclosure provided by woodland blocks, hedgerows, landform and settlement • Pasture for horses and livestock • Chestnut coppice and evergreen woodland blocks • Recent development within Brabourne Lees • Large, historic farm houses to the south amid a parkland landscape of pasture and isolated trees
<p>ABC-29 Evegat Mixed Farmlands</p>	<ul style="list-style-type: none"> • Undulating topography • Intensively farmed landscape with small pockets of pasture • Comprehensive network of tree cover provided by highway planting, hedgerows and a block of broadleaf ancient woodland • Ponds and vegetation lined water courses • Fragmentation caused by major infrastructure routes • Large electricity sub station • Converted oast houses at Evegat Business Park
<p>ABC-30 Brabourne Arable Farmlands</p>	<ul style="list-style-type: none"> • Intensive arable land • Large, open, extensive fields • Extensive hedgerow loss and limited tree cover • Dramatic panoramic views of the Kent Downs AONB • Narrow water courses originating from a series of springs along the foot of the Downs • Isolated farms

Character Area	Key Characteristics
<p>ABC-31 Brabourne Farmlands</p>	<ul style="list-style-type: none"> • Gently undulating landform which forms part of the immediate foreground to the Kent Downs AONB • Series of narrow streams run perpendicular to the Downs • Mature pollard ash trees mark woodland boundaries • Isolated oak trees set within arable fields • Series of parallel narrow lanes run perpendicular to the Downs • Clusters of vernacular style buildings • Traditional and more recent residential development is strewn along the lanes
<p>ABC-34 to 37 Cheesemans Green, Colliers Hill, Clap Hill, and Aldington Frith</p>	<ul style="list-style-type: none"> • Generally open, mainly flat arable land with cluster of farms around Cheeseman’s Green and small hamlet at South Stour • Captain’s Wood, an ancient oak and ash woodland with some hornbeam coppice and associated semi-improved grassland/rush • Hedgerows are variable, and generally high to lanes, but where arable there is evidence of hedgerow and ditch clearance, river and dyke dredging. • Rising ground between the Stour floodplain with distant views to Ashford • Predominantly arable farmland rising to distinctive knoll at Collier’s Hill and extending to East Stour River at Swanton Mill. • Large fields intensively farmed and evidence of hedgerow clearance. • Mature hedgerow to Roman Road and tree cover limited to farmsteads and pollarded willows at Swanton Mill. • Broad Oak on the Roman Road is a mix of bungalows and traditional farm cottages. • Large open arable fields along the Aldington Ridge. • Traversed by Bank Road – a Roman Road with high hedges and localised tree cover. • Extensive views north to Mersham, west and north west to Ashford and the North Downs and south to Dungeness. • A close grained landscape of gentle folds and sunken lanes contained with high hedges and trees which absorbs much of the development of Aldington Frith. • Frith Road/ Priory Road crossroads has a collection of traditional Kentish style buildings, with newer properties to the lanes and scattered farmsteads. • Mixed farmland with paddocks and hedges, and more open arable farmland

Character Area	Key Characteristics
<p>BC-52-54 Hinxhill North Farmlands, Game Rearing Farmlands, and Hatch Park</p>	<ul style="list-style-type: none"> • The southern part is steeply sloping with series of mixed woodland containing some plantation conifers and sweet chestnut coppice with wet woodland and pasture on the valley floor. • Hedgerows and streams provide a good field pattern and link to adjoining woodlands and marshes. • Sales Wood is sited on a knoll in the central part surrounded by open arable fields with long views to the North Downs and fringes of Ashford. • Undulating farmland with scattered farmsteads and distinctive pattern of linear tree cover and copses. Large productive arable fields have lost some internal field boundaries. • Woodlands comprise various mixed plantation woodlands with notable mature oak, ash and beech, wet alder coppice, sweet chestnut and hornbeam coppice. Many are managed for pheasant rearing and game. • Lanes are sunken and winding in places bounded by species rich mature hedgerows. • Series of springs and associated streams with flushes of willow and wet meadows with rough pasture. • Deer park with woods, springs, lakes and pasture, some conversion to arable to south. • Veteran trees remain – north of park is designated SSSI • M20 in cutting to southern edge – noise impacts onto area
<p>ABC-55 to 57 Nackholt Higher Fields, Bourne Dyke Wet Pastures, and Nackholt Wood</p>	<ul style="list-style-type: none"> • The land gently falls to the floodplain and lies on Gault Clay. The soils are easily waterlogged and have been drained by a series of dykes creating large fields predominantly for sheep pasture but with some arable. The dykes are marked by flushes of crack willow and ash. • There is a good network of hedges to lanes. • Old brick works at Nackholt with lake. • Long views to north across the Wye Valley and to east to North Downs • Valley floor with series of sheep pastures enclosed by good network of dykes, streams and ditches with mature hedgerows and scrub. • Blocks of wet willow woodland are linked to surrounding network of wetland habitats and species rich wet meadows. • A mixed use woodland with tall stand of poplars and pond to west, mature wet woodland with ditches and dense hazel coppice, veteran oaks adjoining lane to south and open wet flower meadows. Designated Site of Nature Conservation Interest. • The conifer plantation within is well screened. • Good hedgerow corridors to north west and southern boundaries.

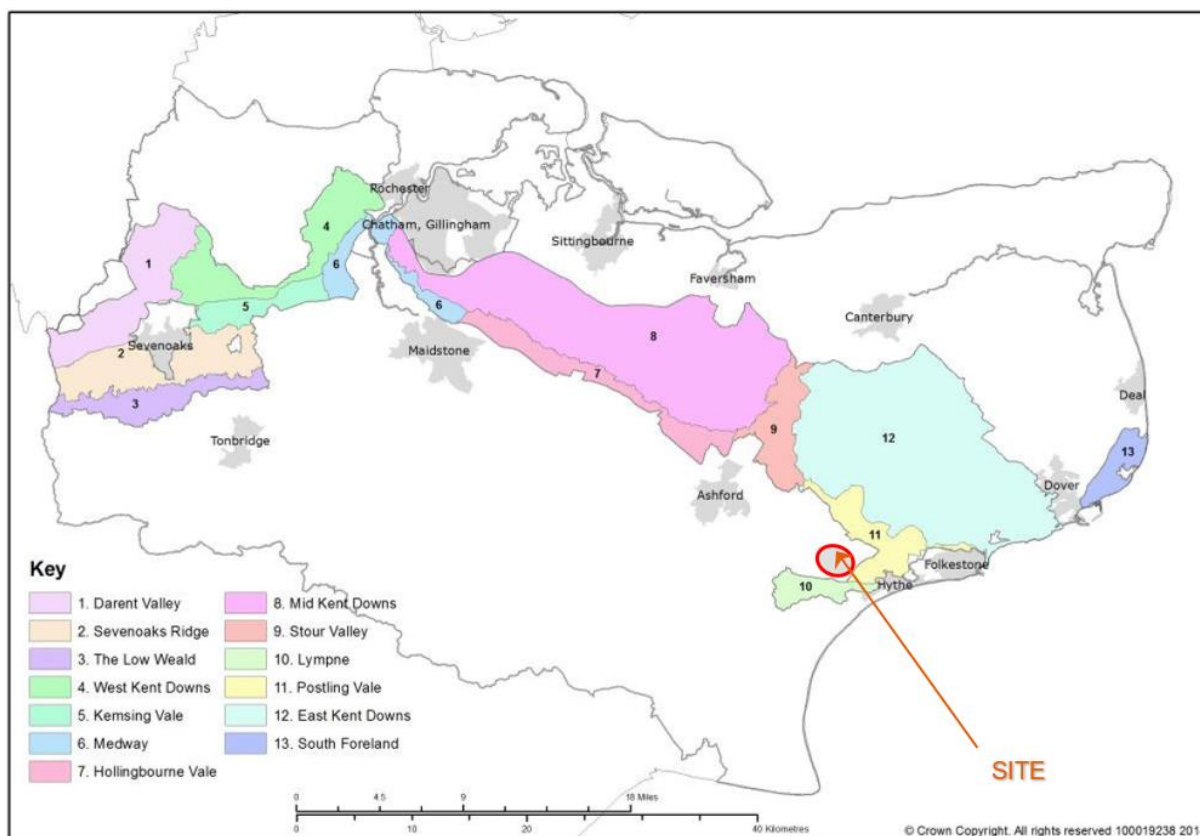
Character Area	Key Characteristics
ABC-65 to 68 Sevington High Fields, Mersham Paddocks, Bower Road Farmlands, and West Mersham Farmlands	<ul style="list-style-type: none"> • Open arable farmland on gentle rise crossed by Highfield Lane (bounded with hedgerows) and dominated by Sevington Church. • A line of poplars delineates the brook. • The noise from the M20, CTRL and bypass is very apparent. • Steep valley with sheep pasture and bog, poached gappy hedges, woodland plantation and edge planting to M20 in cutting. • Large open arable fields with some pasture around Bower Farm on the steeper slopes. • Adjacent to Mersham the landscape is more intact with high hedgerows and trees, streams, poplar windbreak and fine block of alder coppice. • Bower Road has fine hedgerow in places. • M20 and CTRL in cutting with new planting are well screened, but noise is apparent. • Business Park at Wembden Farm is a local detractor. • Long views south to Aldington Ridge but very restricted to west by woodland and poplars. • A group of farms with gentle open undulating arable fields with gappy hedgerows and some paddocks adjacent to the farm buildings. • The sunken lanes, such as Blind Lane have high mature hedges and the area to the west has a wooded feel with small mixed woodland adjacent to the CTRL. • The CTRL is on embankment in places and is particularly prominent

AONB

Kent Downs AONB Landscape Assessment

- 12.3.53 The primary source for landscape character baseline information used in this LVIA that is specifically focused upon the Kent Downs AONB is that contained within in the Countryside Commission publication CCP 479: *'The Kent Downs Landscape – An assessment of the AONB'* (AONB-KDL) published in 1995.
- 12.3.54 The planned update of the AONB landscape character assessment (described in section 4.3 of the AONB-MP (2021-2026)) is not yet publicly available from the planning-publications or landscape character pages of the AONB website so has not been used within this LVIA.
- 12.3.55 The AONB-KDL has been supplemented by further baseline information (albeit less detailed) from the AONB-MP (2014-2019), the AONB-MP (2021-2026) and the AONB-LDH.
- 12.3.56 The AONB-KDL identifies thirteen individual LCAs within the AONB (see Figure 12.5) and divides many of these into 'local character areas', which "look in more detail at the specific characteristics of these localities and highlight some of the pressures facing them". Areas of particular sensitivity have been highlighted as 'vulnerable landscapes'. Certain AONB-wide aspects of landscape character such as the 'Chalk Scarp', 'Chalk Grasslands' and 'Buildings' have been examined in more detail.

Image 12-8 Extract from Kent Downs AONB Management Plan (2014-2019) Figure 5 Landscape character areas



- 12.3.57 As shown on Figure 12.5 and Image 12-8 the site lies adjacent to the Postling Vale and Lympne character areas. The key characteristics of these areas and other aspects described in the AONB-KDL that are relevant to the site and its surrounds, the proposed Development and this assessment are described in the following paragraphs.

Lympne LCA

- 12.3.58 The 'Lympne' LCA comprises the greensand ridge of the Hythe escarpment between Aldington and Hythe, as well as parts of the Wealden clay landscape at the west end of this and part of the Romney Marsh to its south.
- 12.3.59 The '*Hythe escarpment*' local character area is characterised by: its magnificent views across Romney Marsh and the English Channel from the escarpment; the steep, uneven eroded face of the scarp populated by small blocks of woodland and scrub; and the old military defences scattered across the area, from the Royal Military Canal at the base of the scarp to the Second World War 'Sound Mirrors' on the slopes behind Burmarsh, and the ragstone Lympne Castle.
- 12.3.60 The scarp is highly visible from the flat, remote '*Romney Marsh*' local character area, and so is vulnerable to further development upon its slopes. The local character area of 'Aldington', at the west end of the scarp has "*softer, more rounded slopes*" and a higher proportion of deciduous woodland which reflects the change to more stable clay soils. There is also more cultivation of the land and more scattered large properties.

Postling Vale LCA

- 12.3.61 The '*Postling Vale*' LCA is characterised by its: "*magnificent views*" from the scarp; the rough grassland of the scarp slope with typically a notable belt of scrub at its foot; and the large fields, remnant hedgerows and scattered large woodlands at the base of the slope.
- 12.3.62 The local character area of '*Stowting*' forms the eastern edge of the site and it is also the closest part of the AONB to its north. This area is described as a more "*open, intensively farmed landscape which extends out towards Ashford.*" There are "*large arable fields ... surrounded by small shaws or overgrown hedges or trimmed remnant hedges*". The AONB-KDL notes that although the scarp in this area is "*largely grassland, there are occasional blocks of deciduous woodland on the top.*" The "*distinctive features draw the eye away from the scarp-foot developments such as the motorways and provides a means of orientation in the landscape.*" In the west part of the *Stowting* local character area, around the village of Brabourne, the scarp is described as becoming shallower and more cultivated, which has "*marred the characteristic 'natural appearance of the eastern slopes which is further compromised by gradual ribbon development and pockets of suburbanisation along the scarp foot.*"
- 12.3.63 The part of the '*Stowting*' local character area immediately to the east of the site is described as an area of "*flat farmland ... broken up by large blocks of woodland and small ditches*" in which a considerable amount of "*hedgerow loss has occurred.*" East of here this the '*Saltwood*' local character is described as a more intimate landscape of "*steep stream valleys, small woodlands and pasture.*"
- 12.3.64 Further east around the local character area known as the '*Folkestone outskirts*' the AONB-KDL highlights the presence of the: steep, enclosed coombes, and prominent landforms of Sugarloaf Hill and Summerhouse Hill dominating the edge of the town. It also notes the Channel Tunnel Terminal and M20/A20 motorway at the foot of the scarp through this area which sever the Downs from the town and dominate views from the scarp.

East Kent Downs LCA

- 12.3.65 The '*East Kent Downs*' are described a "*remote, peaceful area of downland*" located "*above the southern scarp.*" It is characterised by: the long parallel dry valleys of the dip-slope running north-east; thick shaws and overgrown hedgerows on the steep valley sides; large arable ridge-top fields; a predominance of conifer and coppice

woodlands on the upper slopes, decreasing in quantity towards the coast; single-track lanes leading to scattered remote settlements; and *shaves* (narrow strips of rough grassland – usually too steep to cultivate). The local character areas which are closest to the site are *Petham* and *Elham*. *Petham* has a notable intimate, remote character, whereas *Elham* is described as a transitional landscape between this and the more open downland between Folkestone and Dover.

Stour Valley LCA

- 12.3.66 In the far north-west of the study area lies the ‘*Stour Valley*’ LCA. Whilst the majority of this area’s characteristics are associated with those of the river valley, and floodplain, the AONB-KDL local character area within this – ‘*Hampton*’, includes the part of the scarp slope known as the ‘*Devils Kneading Trough*’. This publicly accessible coombe and the escarpment at its peak, form a “*dramatic backdrop to the gentle farmland below.*”

AONB-wide aspects of landscape character

- 12.3.67 The AONB-KDL highlights that the ‘chalk scarp’ through the AONB (stretching, in fact from Farnham, Surrey within the Surrey Hills AONB, to Folkestone) provides a “*strong sense of continuity*” throughout the length of the AONB. The AONB-KDL highlights the “*magnificent southerly views across Kent*” that are possible from the scarp, but also its vulnerability to issues such as agricultural cultivation, quarrying, off-road driving, recreational car-parking, traffic and development “*immediately below the scarp*” that are likely to have a “*high impact on the enjoyment of views, unless very sensitively sited and screened*”.
- 12.3.68 The AONB-KDL highlights the contribution use of local building materials makes to the character of the Kent Downs, such as flint, brick, timber (in the form of structural timbers and weather boarding), and in particular Kentish Ragstone from the greensand belt, and used most extensively “*along the scarp foot.*”
- 12.3.69 The AONB-KDL highlights the importance this area has played in the defence of the British Isles. It cites as evidence the remains of the Roman settlement on the scarp slopes of the Hythe escarpment just south of Lympne; the Saxon-shore fort of Lympne; the Martello Towers and Royal Military Canal around the edge of Romney Marsh; and remnants of defences, listening devices, airfields associated with the Battle of Britain in the Second World War.

Vulnerable landscapes

- 12.3.70 None of the LCAs that the AONB-KDL cites as containing ‘*vulnerable landscapes*’ are within the LVIA study area. However, some of the ‘*vulnerable landscape*’ issues raised in the assessment of other LCAs have associations with those surrounding the site. One such issue is found along the valley of the River Medway. Here industrial development along the valley bottom is seen as particularly damaging because of the resultant indiscriminate loss of important “*features such as hedges, tress and shaws.*” The AONB-KDL highlights that “*such losses reduce the capacity of the landscape to absorb the visual impact of development.*”

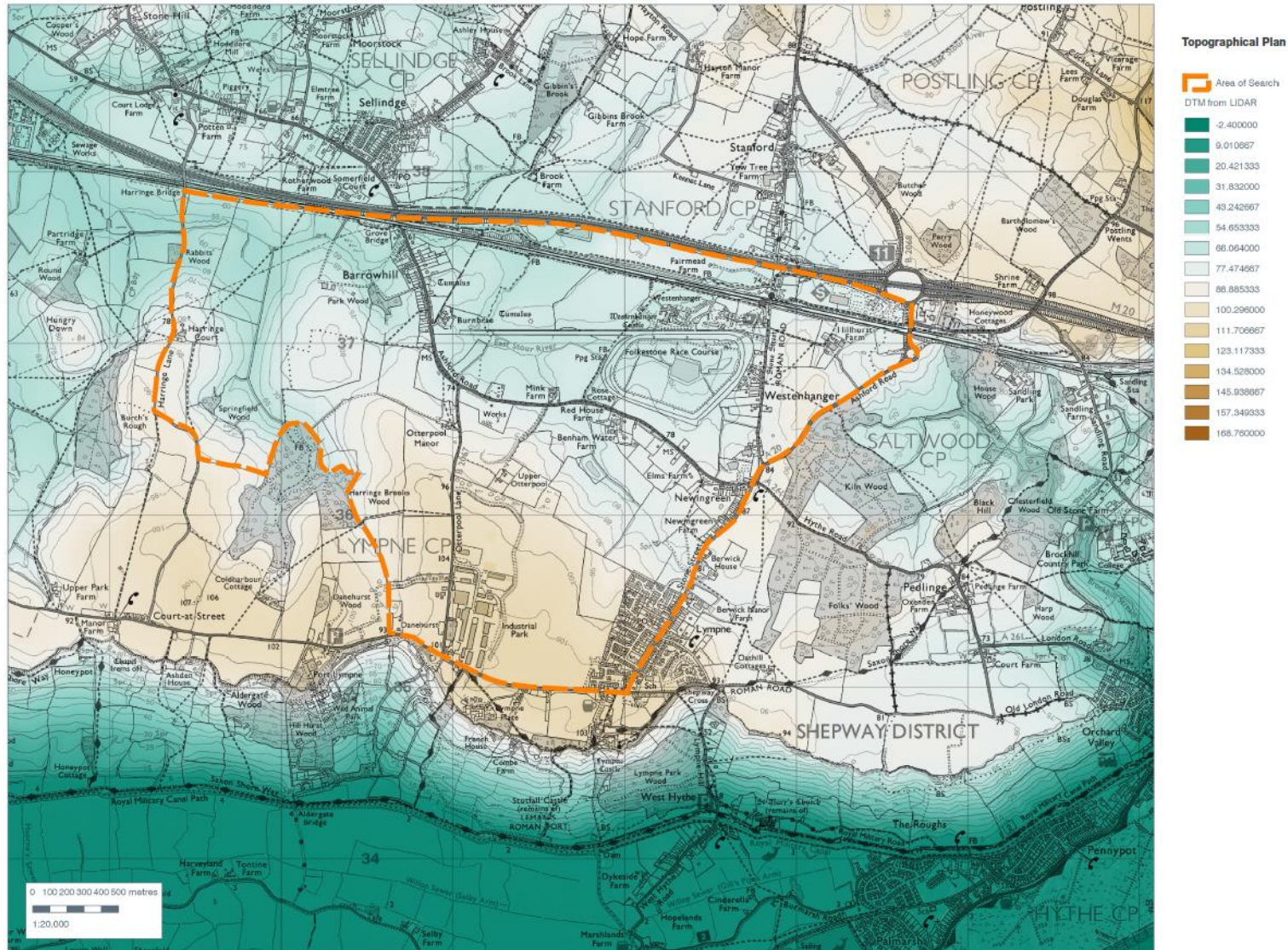
Romney Marsh Landscape Character Assessment

- 12.3.71 A landscape character assessment for the area of Romney Marsh, the RM-LCA was prepared in 2016 for F&HDC (then SDC) and the Kent Wildlife Trust in association with the 5th Continent Landscape Partnership by Fiona Fyfe Associates. For F&HDC the assessment was commissioned to inform the F&HDC-P&PLP
- 12.3.72 The RM-LCA took the LAK as a starting point and amended LCA boundaries as appropriate to reflect changes that have taken place in the landscape since 2004. All of the LCAs, and their characteristics, identified within the RM-LCA (where they fall with the administrative area of F&HDC) have been adopted into SDC-HLLA.

Site Specific landscape character assessment

- 12.3.73 The initial fieldwork and site analysis undertaken in preparation for the 2019 EIA-LVIA, and reviewed in 2020/21 in the preparation of this assessment, concluded that sole reliance upon the existing landscape character assessments in relation to the site itself is too broad-scale in nature to provide sufficient information to inform the proposed Development's masterplan. For this reason, and on account of the size of the site and the relative complexity of its landscape, a site-specific landscape character assessment was considered appropriate.
- 12.3.74 The site and its immediate surrounds have been divided into 20 distinct LCAs. ES Appendix 12.1 sets out the key characteristics of each in terms of land-use, topography, visual context, vegetative cover, perceptual aspects, and settlement pattern. It also identifies the condition of the LCAs, their key sensitivities and actions arising from this that have been taken forward into the planning of the proposed Development. The boundaries of the site-specific LCAs are not rigid, but instead the characteristics of each merge into the edges of those that adjoin.
- 12.3.75 The paragraphs below set out a description of the overall site and its surrounds in relation to the landscape character and visual amenity issues, using references to the site-specific landscape character assessment.
- 12.3.76 The site covers an area of approximately 589ha upon the dip-slope of the Hythe (or sometimes Lympne) escarpment part of the greensand ridge. The area has a bedrock of predominantly Hythe, Sandgate and Folkestone Formations of calcareous sandstone and ragstone. To the west area Atherfield and Weald Clay have become exposed by hydrological flow. The major chalk landform of the North Downs emerges, at its closest point some 2.5km to the north. The broad valley between the greensand ridge and the escarpment of the North Downs within which the north of the site lies within is known as the Vale of Holmesdale – a name applied to the entire valley between the North Downs and the greensand ridge between Folkestone and Guildford, in Surrey.
- 12.3.77 As shown on Image 12-9, taken from The *Technical Summary* of the initial placemaking proposals for Otterpool Park (Ref 12.37) (which shows a different site boundary to that of the OPA), the landscape of the greensand ridge dip-slope is incised by a number of minor watercourses that flow northwards to join the East Stour River.
- 12.3.78 Two such watercourses rise just south of Harringe Brooks Wood and join within this designated Ancient Woodland. The erosion of these has led to the formation of two distinct landforms – that of Lympne-Barrow Hill and that upon which lies Harringe Lane. Further east another watercourse rises just at the edge of Folks Wood (a designated Ancient Woodland) and cuts a course north-westwards to join the East Stour near to Westenhanger Castle, and in the process separating the Lympne landform from that of Newingreen and Hillhurst Farm.

Image 12-9 extract from 'Otterpool Park – Garden Settlement – Technical Summary'



- 12.3.79 These hydrologically-borne undulations continue through the landscape to the west of the site until the landform of the greensand ridge disappears under the conurbation of Ashford
- 12.3.80 To the east of the site the escarpment of the greensand ridge itself becomes sharply incised by watercourses, through Brockhill and Saltwood, that cut quick routes to the coast between Hythe and Folkestone.
- 12.3.81 Meanwhile the East Stour River, whose catchment the site is predominantly within, and which rises at the foot of the North Downs scarp slope above Postling, takes a far long route. It winds its way westwards towards Ashford, before meeting the Great Stour and turning sharply northwards through a gap North Downs escarpment.
- 12.3.82 The Stour Gap forms a distinct break in the Downs, and forces the escarpment to turn inwards towards it. Between this gap and Capel-le-Ferne, where the North Downs become the ‘white cliffs of Dover’, the chalk landform is aligned north-west to south-east. In contrast to the relatively consistent stretches of the escarpment west of the Stour Gap, this section is unusually disrupted by a number of topographical intrusions. One clear basin exists around the village of Stowting and the other, visually more complex than this, lies around the settlement of Etchinghill. This later intrusion creates a set of deep coombes just north of Peene, and also the major chalk outlier of Tolsford Hill and the conical Summerhouse Hill.
- 12.3.83 The North Downs through the area surrounding the site reaches a height of approximately 180m Above Ordnance Datum (AOD) (at Tolsford Hill and Brabourne Downs). In contrast the greensand ridge reaches a height of 108m AOD near Court-at-Street. Levels within the site range from 57m AOD in the north-west to 107m AOD in the south (upon the site of the Lympne Airfield near to the Aldington Road)
- 12.3.84 In sharp relief to both the landforms of the North Downs and greensand ridge, is that of Romney Marsh to the south. This is a vast, flat, low-lying, wetland landscape with a comprehensive network of drainage ditches, protected from the sea by manmade coastal defences.

Land-use and Vegetation

- 12.3.85 Proportionally, the majority of the site is farmed. There is however a very diverse range of other land-uses, in and around this, which include the:
- residential settlements of Westenhanger, Barrow Hill, Newingreen, Lympne and Sellindge;
 - scattered dwellings such as Upper Otterpool, Otterpool Manor, Berwick House and Coldharbour;
 - farmsteads of Hillhurst Farm, Somerfield Court Farm, Berwick Manor Farm, Benham Water Farm, Harringe Court, and Barrow Hill Farm;
 - residential and commercial ribbon development along the A20 between Newingreen and the settlement of Barrow Hill (including the Holiday Extra’s office complex);
 - visually distinct area Lympne Industrial Estate and its unfinished extensions;
 - Westenhanger Railway Station and its car park;
 - complex of Westenhanger Castle;
 - complex of Lympne Castle;
 - historic estate of Sandling Park

- M20 Folkestone Service Station and Lorry Park
 - distinctive form and buildings of the old Folkestone Racecourse;
 - complex of visitor facilities, car parking, accommodation cabins and site of an annual music festival associated with Port Lympne Animal Park.
- 12.3.86 In addition, there are a range of historic land-uses associated with both rural and commercial/industrial activities have been present on the site and its surrounds, and in most cases are still visible. These include the:
- ancient barrows around the settlement of Barrow Hill;
 - remnants of Otterpool Quarry, now partly a geological SSSI, partly a lorry park;
 - remnants of the old Lympne Airfield, which was first a military and later civil airfield, ceasing operation in 1984; some limited hardstanding remains but the area is now predominantly a closely managed un-farmed grassland;
 - recently unearthed Roman villa between Otterpool Quarry and Mink Farm;
 - old Stanford windmill;
 - Royal Military Canal; and
 - deer parkland and pale of Westenhanger Castle.
- 12.3.87 Away from the site and its immediate environs, other major development influencing the character of this part of Kent includes:
- the Channel Tunnel Terminal, located on the northern edge of Folkestone;
 - other transport infrastructure including the M20 motorway, the High Speed 1 and Ashford to Folkestone railway lines running along the base of the Vale of Holmesdale;
 - major power infrastructure includes Dungeness Power Station, Little Cheyne Court Wind Farm, Partridge Farm Solar Farm (400m to the west of the site – adjacent to which a further 49.9 megawatt solar farm is also proposed), high voltage power transmission lines, and the Sellindge Converter Station; and
 - the Sellindge Sewage Treatment Works (500m to the north-west of the site).
- 12.3.88 Most infrastructure and settlement through this area is largely concentrated between the greensand ridge and North Downs escarpment, as it is for much of the Vale of Holmesdale.
- 12.3.89 The farmland across the site is predominantly in arable use, with medium-large scale fields bounded by a mixture of fencelines, mature and overgrown hedgerows, shaws and tree belts. Between Lympne and the settlement of Barrow Hill the fields are also shaped on some sides by the well-treed watercourses that drain the area.
- 12.3.90 The woodland cover of the site and its surrounds is as varied as its landform. As shown on Figure 12.9, these two have a close connection. Those areas with steeper gradients and hence which are more challenging for cultivation, such as the scarp crests and coombes of the North Downs and greensand ridge, are often well-wooded. Harringe Brooks Wood is an example of this immediately adjacent to the site.
- 12.3.91 Likewise, the crest of the Hythe escarpment is also well wooded. To the south of the site this includes Aldergate Wood, Hill Hurst Wood and Lympne Park Wood. To the east of the site the estate of Sandling Park retains much of its commercial and coppice woodlands – such as Kiln Wood (designated Ancient Woodland), Folks Wood and Chesterfield Wood. To the east there are major blocks of woodland between Aldington and Ham Street, skirting the northern edge of the comparatively treeless, open and exposed landscape of Romney Marsh.

12.3.92 The site itself contains few woodlands of any noticeable size. Apart from Park Wood and the aptly named Springfield Wood other substantial areas of trees arise from the desire to integrate built development and infrastructure. Major planted belts exist around Lymgne Industrial Estate, around parts of the old Lymgne Airfield, along the M20 and HS1/Ashford to Folkestone railway line, and between the old Folkestone Racecourse and Westenhanger Castle. Most of the settlements across the site, in particular Westenhanger and Barrow Hill, have a strong vegetated form.

Built-Form and Settlement Pattern

12.3.93 Folkestone is the major settlement in the area – its centre lying 9.71km from the edge of the site. Ashford lies 9.55km to the north-west. Between these, along the historic coaching routes to London, are the settlements of Mersham, Sellindge, and Hythe, and the ribbon development of Newingreen, Barrow Hill and sporadic development in-between. Other settlements such as Lymgne, Westenhanger and Stanford lie upon Stone Street, the older transport routes to Canterbury.

12.3.94 As such the majority of settlements are predominantly linear in nature, relying upon a crossroads or another road junction to form their central cores. Whilst these settlements retain elements of their once rural setting most now rely on the transport opportunities that the strategic transport corridor through this area provides.

12.3.95 The settlements through the site and its surrounds are mixed in their architectural styles and the materials used in their construction. The variety is most clearly shown in the village of Lymgne where the strongly vernacular ragstone buildings and closely walled complex of Lymgne Castle contrasts sharply with the winding cul-de-sac arrangement of amorphous brick late twentieth modern housing at the opposite end of the village. Whilst most other settlements show an equal disparity of styles and forms, one element that has some degree of consistency is the close frontage of properties onto the adjoining roads – such as along Stone Street and the A20. The few farmsteads that exist through the site predominantly use brick as their main material. This includes Otterpool Manor, Hillhurst Farm, and Berwick.

12.3.96 Whilst the majority of buildings within and around the site are domestic in size and scale, the site is not unfamiliar with larger buildings. These include:

- the grandstand, hospitality buildings, and maintenance/storage sheds of Folkestone Racecourse;
- Westenhanger Castle and barns;
- the main hall of the Folkestone Motorway Service Station;
- the salt sheds of the M20 maintenance yard;
- the Lymgne and Sellindge village halls and school halls;
- the transformer structures of the Sellindge Electricity Converter Station.
- the 14m high warehouse buildings within Lymgne Industrial Estate; and
- the agricultural barns of Somerfield Court Farm, Harringe Court, Otterpool Manor, Barrow Hill Farm, Hillhurst Farm, and Berwick Farm.

12.3.97 The existing settlement and built development within and around the site form a number of existing lighting sources that are visible from points throughout the study area. These include the:

- 24 hour road lighting around the elevated sections of the Junction 11 of the M20 and connections to the A20;
- 24 hour task, signage and safety lighting around car park, petrol station, lorry park and main building of the Folkestone motorway service station;

- 24 hour task lighting associated with the motorway maintenance yards;
- road lighting around the junctions of the A20 with Stone Street / Hythe Road and with Otterpool Lane;
- street lighting and domestic lighting within the villages of Lympe, Barrow Hill, Westenhanger, Newingreen, and Sellindge;
- 24 hour security, task and signage lighting associated with Lympe Industrial Estate;
- security and signage lighting of the airport café and Otterpool Quarry lorry park;
- security and safety lighting associated with the business premises at Newingreen.

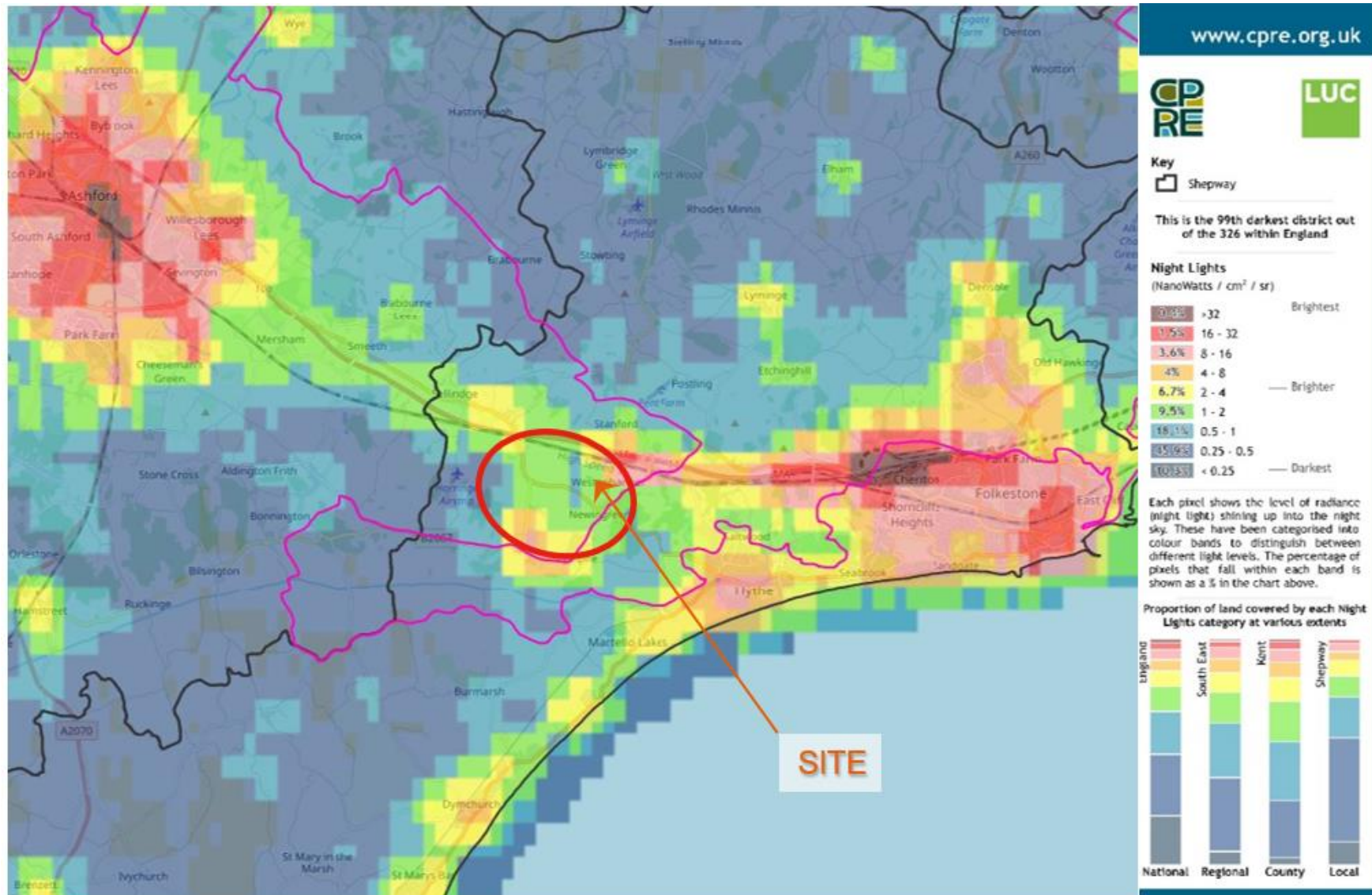
12.3.98 Also visible at points throughout the study area are the:

- road lighting along stretches the M20 and its junctions;
- vast array of task, safety and security lighting of the Channel Tunnel Terminal areas, platforms car parks and terminal buildings;
- street, trunk road, domestic and commercial lighting in and around the major built up areas of Ashford and Folkestone;
- street lighting and domestic lighting in and around the smaller settlements of, Hythe, Brabourne Lees, Stowting, Brabourne, Postling, Wye, Brook, Aldington, Mersham, and those along the coastal strip between Hythe and Dungeness;
- task, security and safety lighting associated with Dungeness Power Station.

12.3.99 Collectively, these light sources combine to create a corridor of relatively bright night lighting between the two conurbations of Folkestone and Ashford. This corridor broadens in width past the site on account of the presence of a relatively high number of settlements, the Lympe Industrial Estate, junction 11 of the M20, and the motorway service station.

12.3.100 This occurrence is also observed by the recent mapping (see Image 12.10) that the Campaign for the Protection of Rural England (CPRE) have released (Ref 12.38).

Image 12-10 extract from CPRE's maps of England's light pollution and dark skies

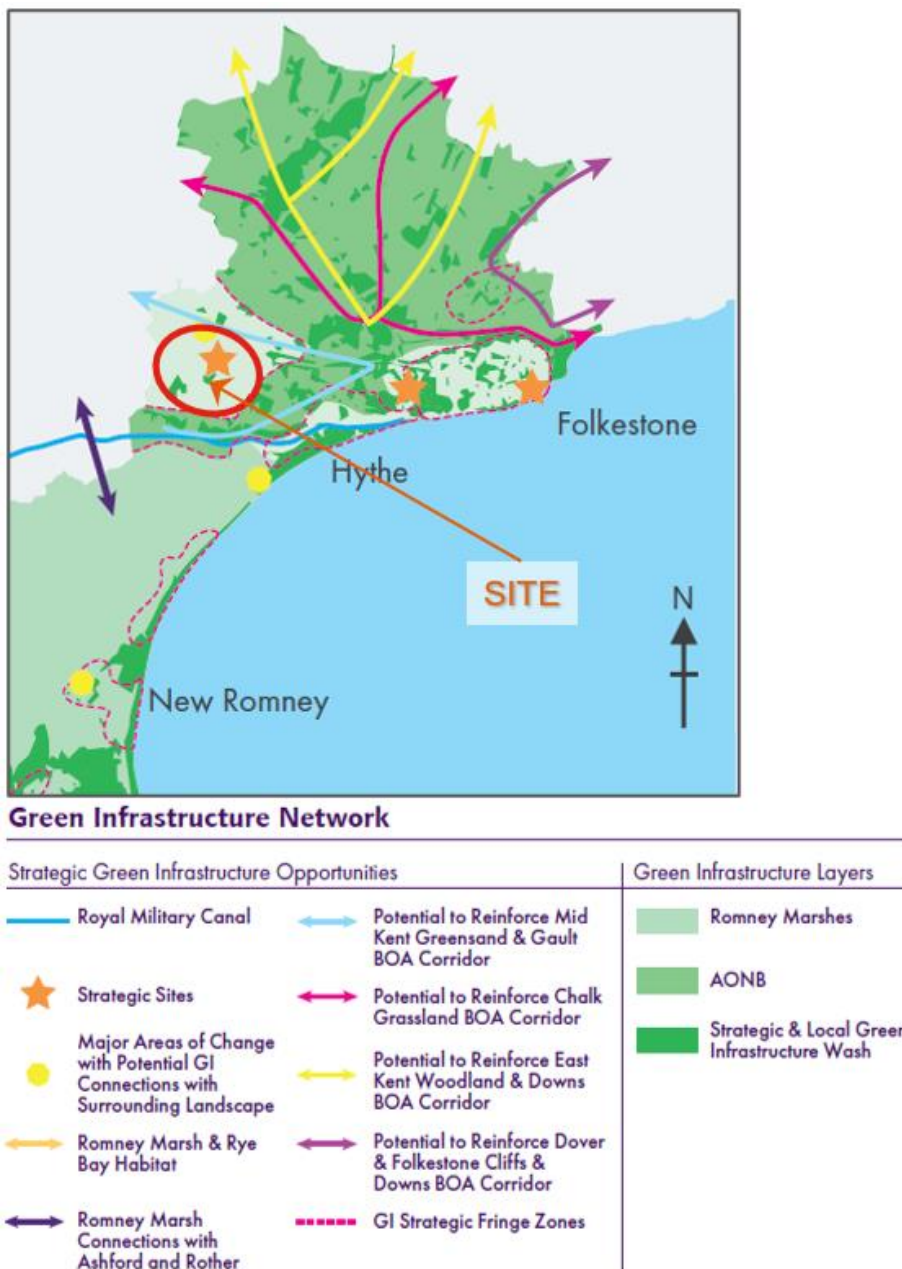


Green Infrastructure

12.3.101 As well as being a strategic transport corridor the site and its surrounds has been identified as being important to current and future strategic green infrastructure of the District.

12.3.102 Image 12-11 demonstrates that at adopted planning policy level, and at emerging planning policy level, the site’s boundary with the AONB is identified as a ‘GI Strategic Fringe Zone’, where improvements are sought through developing “corridors with the potential to better link greenspace and settlements.” In addition, Harringe Brooks Woods and others are identified as being part of the ‘Strategic and Local Green Infrastructure’, and the area just north of the site, in Sellindge, is noted as a ‘Major Area of Change with Potential GI Connections with Surrounding Landscape’; and the site itself is a ‘strategic’ GI site.

Image 12-11 Extract from CSR Figure 5.2– Green Infrastructure Network



Landscape Related Designations

Kent Downs AONB

12.3.103 Figure 12.3 shows that the southern and eastern boundaries of the site lie immediately adjacent to the AONB. To the north of the site the AONB is separated from it by a distance of approximately between 1.2km and 1.45km, as the designation's boundary follows the north-west – south-east alignment of the North Downs escarpment. The escarpment itself lies approximately between 2.1km (at its closest point) and 5.5km north of the site (when measured due north from the north west corner of the site).

12.3.104 The AONB was designated in July 1968. It covers an area of 878sq.km (326 sq. miles), entirely in Kent, stretching from the Surrey/Greater London border to the Strait of Dover. Section 2.1.2 of the AONB-MP (2021-2026) identifies that the Kent Downs are 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*” as shown in Image 12-12.

12.3.105 The AONB's in both Kent and Surrey follow the alignment of the North Downs escarpment but also encapsulate areas of the valued adjoining landform. In the case of the AONB this includes Greensand Ridge south of Sevenoaks and the Lympne Escarpment. The AONB, unlike its sister designation in Surrey, also includes an extensive part of the dip-slope of the North Downs – i.e. between Rochester, Canterbury and Dover.

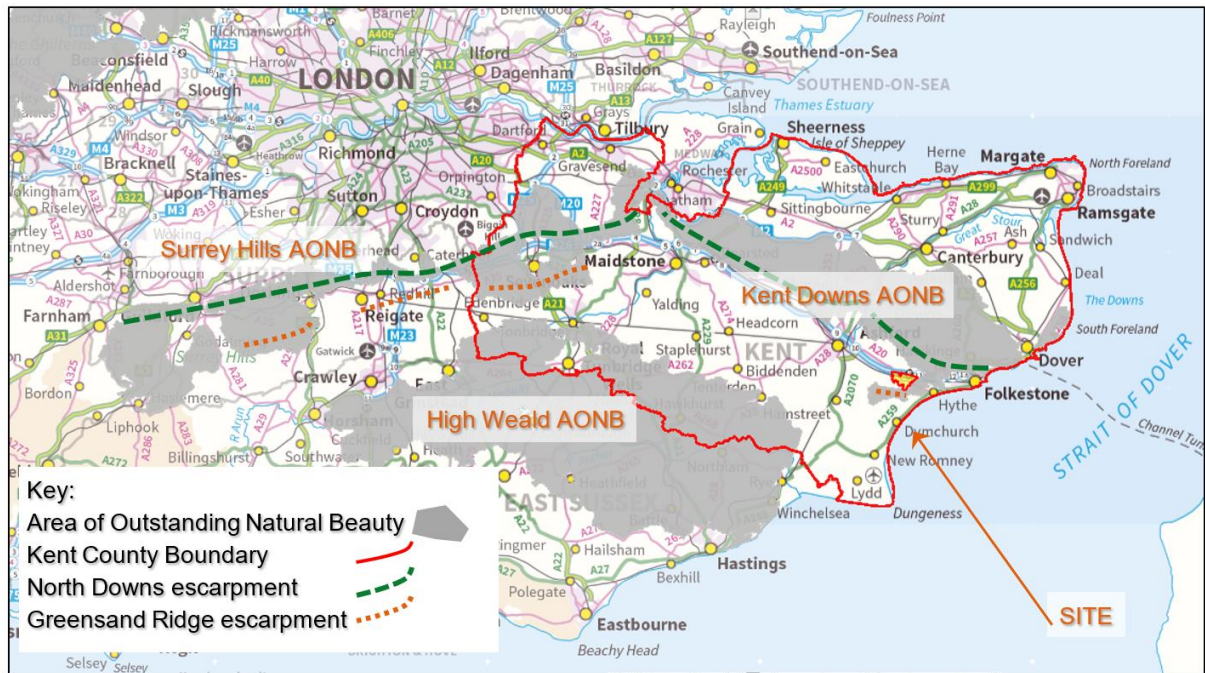
12.3.106 As outlined in Section 2.1.5 of the AONB-MP (2021-2026) the term ‘natural beauty’ in relation to the designation is defined in part IV of the CRoW Act 2000 as an area’s “*flora, fauna, geological and physiographical features*”. The AONB-MB (2021-2026), however, also states that the term ‘natural beauty’ was “*always intended to embrace more than just the visual or scenic elements of the landscape and the definition has been updated and broadened to include historic and cultural heritage*”. It cites government agency guidance (Areas of Outstanding Natural Beauty: A guide for AONB partnership members – Countryside Agency, CA24, November 2001) specifically on AONBs to demonstrate this point:

“Natural beauty is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries.”

12.3.107 The AONB-MP (2021-2026) concludes by stating:

“At the core of the secondary purpose of AONB designation is the understanding that the landscape is not just scenery, but it is the result of the historic and on-going interaction between people and place. Social and economic activity that contributes to the landscape and natural beauty is fundamental to shaping the future of the AONB.”

Image 12-12 Extract from Kent Landscape Information System - Interactive Map (Ref 12.39) showing extent of the AONB within Kent



Special Components, Characteristics and Qualities

12.3.108 Section 1.2. of the AONB-MP (2021-2026) identifies that the area's 'special components characteristics and qualities', "which together distinguish it as a landscape of national and international importance and underpin its significance and natural beauty", are:

- Dramatic landform and views;
- Biodiversity-rich habitats;
- Farmed landscape;
- Woodland and trees;
- A rich legacy of historic and cultural heritage;
- The Heritage Coasts;
- Geology and natural resources; and
- Tranquillity & Remoteness.

12.3.109 The AONB-MP (2021-2026) also list two social and economic components:

- Vibrant communities; and
- Access, enjoyment and understanding.

12.3.110 Those 'special components, characteristics and qualities', and their descriptions as defined in the AONB-MP (2021-2026), that are relevant to this site, the proposed Development and this assessment are set out below.

12.3.111 '**Dramatic landform and views; a distinctive landscape character**' (or 'landform and landscape character' as it is termed in section 4. of the AONB-MP) is described in the AONB-MP in section 1.2 as:

"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.

- 12.3.112 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.”
- 12.3.113 The current AONB-MP(2014-2019) version also recognises the presence of the AONB aspect of ‘human settlement’ within this ‘special component / characteristic / quality’ by including the word ‘town’s’ in its description of elements that formed part of the ‘breath-taking, long distance panoramas’. It also states that “*Overlying this landform are diverse natural and man-made features creating distinctiveness at a local level*”.
- 12.3.114 Of the six landscape types described in Section 4.3 AONB-MP (2021-2026)’ only two are relevant to the site and the proposed Development proposals. These are the: ‘*The Chalk Ridge and Vales*’; ‘*The Greensand*’.
- 12.3.115 ‘*The Chalk Ridge and Vales*’: is described, in the AONB-MP (2021-2026):
“The long arc of the North Downs chalk ridge is the most dominant element of the AONB, consisting of the steep, south-facing scarp slope rising above the Gault clay vale below. Spectacular views are offered along the chalk escarpment across the Vale of Holmesdale; the scarp along with the dramatic views it affords was a key target for the original designation of the Kent Downs AONB.”
- 12.3.116 ‘*The Greensand*’: is described, in the AONB-MP:
“The undulating Greensand Ridge rises to one of the highest points in southeast England at 250 metres at Toy’s Hill. The views from along the length of the Greensand Ridge are some of the best in southern England, and on a clear day, the High Weald and the South Downs beyond can be seen. In the east Kent Downs, the Lympne escarpment of calcareous Sandstone and Ragstone provides a spur of higher ground affording dramatic views across the near-level Romney Marsh and Hythe Bay.”
- 12.3.117 Section 4.4 of the AONB-MP (2021-2026) highlights the main issues, opportunities and threats to this ‘special component / characteristic / quality’. Those related to the site and proposed Development are:
“a) Loss of and damage to the quality and character of the AONB through the cumulative effect of inappropriate, poorly designed general development, unsustainable land management approaches and land use change, the impacts of growth in visitor pressure.
b) Degradation of the setting and urban fringe impacts in certain Kent Downs landscape character areas through development, infrastructure, urbanisation and recreational pressure.
c) The impact of Ash Dieback disease with the consequent loss of tree cover in woodland, roadsides and in open landscapes is already impacting significantly on landscape character and will continue to do so.
g) A landscape led approach, supported by a landscape character assessment is not used sufficiently or appropriately in land-use, land management, design and development management decisions, Landscape and Visual Appraisals, Landscape and Visual Impact Assessments and design; landscape character assessments are not always consistent or up to date.”
- 12.3.118 The AONB-MP (2021-2026) describes the ‘**woodland and trees**’ ‘special component / characteristic and quality’:

“Woodland is a much-valued component of the landscape, the sights, changing colours, smells and sounds adding to the perceptual qualities of the landscape.”

12.3.119 In describing the ‘**rich legacy of historic and cultural heritage**’ ‘special component / characteristic / quality’ the AONB-MP(2021-2026) states that:

“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.”

12.3.120 In reference to the ‘**tranquillity and remoteness**’ ‘special component / characteristic / quality’ the AONB-MP (2021-2026) states that:

“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.”

12.3.121 The component of ‘**access, enjoyment and understanding**’ recognises the “considerable demand for access and recreation in the Kent Downs” and the challenges associated with “providing this in a way which supports the special characteristics of the AONB”. These include, for example, balancing the differing needs of those walking, cycling and horse riding on the network of PRoW (which according to the AONB-MP is “four times as dense as the national average and there is a high relative density of bridleways and byways”), including the North Downs Way National Trail and Open Access Land.

12.3.122 In addition to setting out the ‘special components / characteristics / qualities’, section 3.1.3 of the AONB-MP (2021-2026) describes the opportunities and threats that the “**unprecedented growth and development pressures**”, it states the AONB is facing, presents.

12.3.123 Whilst describing that through this intense pressure experienced “the AONB has largely retained its character and qualities”, The AONB-MP(2021-2026) also cites new housing as one such development pressure that can “detract significantly from this important landscape.”

12.3.124 Paragraph 3.4, however, recognises that “to conserve and enhance the natural beauty of the AONB and to create benefit for existing and new communities significant new efforts and investment in the enhancing the green infrastructure, landscape, its natural capital and ecosystems services will be required through such development” and that “a positive exchange of goods and services between the Kent Downs and the surrounding urban areas” can occur.

Setting of the AONB

12.3.125 Whilst section 12.2 of this Chapter set out the planning policy position with regards to the ‘*setting*’ of the AONB, using references from amongst others the NPPF, NPPG,

F&HDC, ABC, and the AONB-Unit, this baseline section sets out what constitutes the ‘*setting*’ with regards to the site, proposed Development and this assessment.

- 12.3.126 It is accepted that, as stated in the AONB-MP(2021-2026), the ‘*setting*’ of the AONB is not defined or indicated on any map, and that its extents depend upon issues such as: the size and nature of the development being considered; the distance from it to the AONB; its potential incompatibility with its surroundings; movement, reflectivity and colour; and where the “*qualities of the AONB which were instrumental in reasons for its designation are affected by proposals in the setting*”.
- 12.3.127 It is also accepted that, as stated in section 4.0 of the AONB-SPS, the AONB’s setting “does not have a geographical border” but in most cases “comprises land outside the AONB which is visible from the AONB and from which the AONB can be seen”. Further to this, in some cases “the setting area will be compact and close to the AONB boundary, perhaps because of natural or human made barriers or because of the nature of the proposed change”, whereas in others the setting maybe be “substantial for example where there is a contrast in topography between higher and lower ground.”
- 12.3.128 Given that the AONB-SPS includes views to and from the “Scarp of the Kent Downs to the Vale of Holmesdale... together with views from the Lympe escarpment to the Romney Marsh and from the Greensand Ridge” in the list of “locations where development and changes to the landscape where the setting of the Kent Downs AONB may be more keenly felt” the proposed Development is considered to be within the setting of the AONB.
- 12.3.129 On the basis (as recognised in the AONB-SPS) that the aspects of distance, intervening barriers and topography can alter the nature of the ‘*setting*’, the following paragraphs have separately considered each part of the designation within the study area (i.e. the North Downs escarpment, the North Downs Scarp Foot, the Hythe Escarpment and the Sandling Park edge) to establish its full extent and sensitivities - in relation to the site and the proposed Development (see Figure 12.8).

North Downs Escarpment

- 12.3.130 The LCAs at national, county and local levels recognise that views from the escarpment of the North Downs can be long reaching. In addition, the AONB-SPS states that the “*Long distance panoramas are offered across open countryside, particularly from the scarp, primarily in a southerly direction.*” From the stretch of the escarpment within the study area they can, on a clear day, reach to the High Weald, the English Channel and even (from the area above Folkestone) to the coast of France.
- 12.3.131 It is accepted that there is clear association between geology of the scarp, the adjoining Vale of Holmesdale and the greensand ridge, and that these should be ‘read’ together in order to gain an understanding of this one aspect of the natural beauty of the AONB.
- 12.3.132 It is also recognised, however, that: the orientation of parts of the North Downs escarpment; the wooded nature of much of its steep slopes and scarp top; the alignment of users upon the North Downs Way National Trail (NDW-NT) in generally north-west to south east, and vice versa directions; and the vulnerability to landform of such elevation to climatic conditions such as low cloud, fog etc; all combine to limit clear, unaffected views to the site from significant stretches of the escarpment.
- 12.3.133 As shown in Figure 12.8 the setting of the North Downs escarpment within the study area therefore comprises of:

- the land at the foot of the scarp slope which is most immediately apparent and visually clear for longest parts of the day and year (by virtue of its proximity), and which is looked on from the scarp when views are possible, almost from above, and in which the detail of villages, farmsteads, scattered settlement, gardens, mixed agriculture and minor roads, and even the Channel Tunnel Terminal (from the scarp above Folkestone) is all readily perceptible;
- the deep and broad open vista of land in the mid-ground, beyond the scarp foot, which forms the Vale of Holmesdale, and in which: occasional distinct landforms, such as Summerhouse Hill; the significant urban areas of Folkestone and Ashford; and the noise, movement and reflection of vehicles on the M20 (including the motorway services) and the railway line, all demand visual attention in views from the scarp;
- distinct landforms such as further parts of the North Downs escarpment to the east and west, and the greensand ridge of the Hythe escarpment in the distance. The wooded tops of these occasionally appear on the skyline in views from the scarp. In addition, land-use patterns and settlement form is apparent, but the detail of these (apart from large or significant buildings, such as that in the Lympne Industrial Estate) is not, when compared to the areas closer to the escarpment, and whose visibility can be compromised by low cloud, haze, fog, glare from the low winter sun;
- the striking, sweeping line of the Romney Marsh and Dungeness Peninsula coasts, the flatlands of the Marsh itself beneath them, the mass of the power station structures, and the vertical white structures of the twenty-six 115m tall turbines at Little Cheyne Court windfarm outside Lydd in the far distance in views from the scarp, when visibility is not affected by sea mist/fret, low sun or glare from the sun reflecting on the sea;
- further distant landforms such as the High Weald and further flung parts of the North Downs escarpment to the west, and the flat horizon formed by the English Channel, which, if the climatic conditions allow, all can form the skyline.

12.3.134 Whilst the ‘setting’ of this area of the North Downs escarpment could be affected by inappropriate built form upon the site, it is considered this could be moderated through: careful planning of the density, height, scale and massing of structures and buildings; providing space for significant native tree planting around and between buildings; and use of appropriate materials and lighting.

12.3.135 The concerns raised within section 5 of the AONB-SPS with regards to the negative consequences to the AONB of an abrupt change of character within its ‘setting’ are abated with regards to this part of the designation, on account of the buffer provided by, at its shortest, the 2km wide gap of predominantly agricultural land between the scarp and the site.

12.3.136 This opinion is shared by the SDC-PTR. Paragraph 2.4 (page 2-65) states that:

“On the landscape criterion, Area B [predominantly encompassing the site] generally slopes downhill from south to north. This slope faces a number of vantage points from the Kent Downs AONB to the north, meaning it is within its setting, albeit with the effect mitigated by distance to some extent- the most prominent land is almost six kilometres from key VPs within the AONB. As such, although it is true that the higher land to the south of the area is visible from the AONB, the effect of distance lessens its impact, certainly compared to Area A [land to the north of the M20], which comprises extensive flat land close to the AONB boundary and forming the foreground of views from it.”

12.3.137 In addition to the views from the scarp, views back to it from the site and its surrounds are possible, and are equally valued. The following analysis of these also helps

ascertain the extent of this part of the AONB's 'setting'. As highlighted in the AONB-SPS, the "*upland nature of the scarp makes it a prominent feature in the wider landscape, particularly in views towards the scarp from the south.*" This is true for a number of areas within and surrounding the site:

- the slightly elevated area of land between the A20 Ashford Road and Stone Street, south of Hillhurst Farm, along PRow HE281, and south of the A20/A261 Newingreen junction upon PRow HE313;
- glimpsed views from the A20 south of the Racecourse between Newingreen and the settlement of Barrow Hill, including from the junction of Otterpool Lane and the A20 and from PRow HE315;
- views from Otterpool Lane heading north from outside of the entrance to the Lympe Industrial estate and also from PRow HE316 as it crosses from Otterpool Lane to Harringe Brooks Wood;
- views from B2067, Aldington Road when leaving and approaching Court-at-Street;
- views from parts of the old Lympe Airfield; and
- views from Harringe Lane, and PRow HE302 over Barrow Hill.

12.3.138 From such locations the North Downs escarpment forms the skyline to distant views northwards and contributes an important part to the visual orientation of users along those PRow, accessible spaces and public highways. The stretch of the North Downs escarpment past the site appears as a consistent combination of gently rolling landform populated by mixed agriculture and woodland. In comparison to other stretches of the North Downs escarpment the only natural or man-made features along the escarpment that particularly draw the eye, and catch attention are the communications masts on Tolsford Hill and the more pronounced landform around them. In many areas of the site greater visual attention is drawn by existing features in the foreground and middle distance such as prominent buildings, farmstead complexes and notable vegetation instead of the escarpment.

12.3.139 From many other areas within the site views to the escarpment are constricted or halted by local landform, woodland, hedge and roadside scrub vegetation, buildings, and the embankments and fencing of the railway and M20.

12.3.140 It is considered that harm to views to the escarpment from the site and its surrounds can be moderated by careful positioning, orientation and massing of new buildings and vegetation to allow frequent views to it, plus the preservation of key views out such as those listed above.

North Downs Scarp Foot

12.3.141 The extent of the 'setting' of those areas within the AONB at the foot of the scarp are, on account of its: lower elevation when compared to the escarpment; the undulating landform of this area; and the ability for intervening vegetation to restrict views through it, much reduced.

12.3.142 From such areas the 'setting' at its shortest is restricted to the edge of a field, within certain views, and at its furthest to the top of the Hythe escarpment between Lympe and Aldington. The narrow glimpses of the upper sections of the greensand ridge that appear in views above intervening vegetation and buildings from the scarp foot comprise a gently rising landform, whose crest is generally wooded or already settled around the site, but which has decreasing tree cover towards Court-at-Street.

12.3.143 As with the setting of the North Downs escarpment, it is considered that there would not be an abrupt change of character within the 'setting' of scarp foot area of the AONB due to the buffer provided by, at its shortest, the 1.1km wide gap between this area and the site.

12.3.144 It is considered that harm to the ‘setting’ of this area of the AONB could be moderated through: careful orientation, height, scale and massing of structures and buildings; providing space for significant tree planting around and between buildings; and use of appropriate materials and lighting to integrate it with its surroundings.

12.3.145 As such the setting of this part of the AONB in relation to the proposed Development is considered to be restricted to upper parts of the site, south of the A20, but one that can be substantially protected.

East of A20- Stone Street to Hythe

12.3.146 The ‘setting’ of the section of the AONB to the immediate east of the site is also much reduced when compared to the ‘setting’ of the escarpment. The landform of this area is similar to that of the site to its immediate west, the AONB here is substantially wooded (along the boundary between the site and Sandling Park the expanse of Kiln Wood and Folks Wood restricts inter-visibility between the two adjoining areas), and they are separated from each other by the busy A20 trunk road, the railway, motorway junction and service station– which all also contribute to a lack of tranquillity in this area.

12.3.147 There are however a few occasional views from the PRow and public highways in this area to the escarpment, across the triangular plot of agricultural land at the far north-eastern end of the site. These include the views from PRow HE313 and the A261 Hythe Road.

12.3.148 The immediacy of the site to this part of the AONB means that there is also a risk of an abrupt change to the character within its ‘setting’. It is considered, however that there are opportunities for new development in this area of the site to: be set back from the edge of the AONB; contain space for significant native tree planting around and between buildings; and use of appropriate materials and lighting to integrate it with its surroundings.

12.3.149 As such the setting of this part of the AONB in relation to the proposed Development is considered to be restricted to the area of land between Stone Street, A20 Ashford Road and Hillhurst Farm, but one that can be substantially protected.

Hythe Escarpment

12.3.150 Given the comparative narrowness of the greensand ridge scarp and dip-slops (when compared to those of the North Downs) the ‘setting’ of the Hythe escarpment in relation to the site can feasibly be both southwards over Romney Marsh and northwards towards the North Downs, over the Vale of Holmesdale.

12.3.151 In reality, the wooded and (in part) settled nature of the top of the greensand ridge around the site, and the gentler landform of the plateau found here means that there are few views from it towards the Downs or the Marsh. It is not until users are either west of Port Lympne Animal Park, or east of the village of Lympne does the landscape open up sufficiently to allow appreciation of its elevation. When views are experienced from this area the most dramatic of these are to the south, as they contain the contrasting landform of the Marsh and sight of the coastline. This is affirmed by paragraph 14.14 of the F&HDC P&PLP which states that “*In the east Kent Downs, the Lympne escarpment ... provides a spur of higher ground affording dramatic views across the near-level Romney Marsh and Hythe Bay*”. It does not mention views back to the North Downs.

12.3.152 As such the setting of this part of the AONB in relation to the proposed Development is considered to be restricted to the area of land between Stone Street, A20 Ashford Road and Hillhurst Farm.

12.3.153 The immediacy of the site to this part of the AONB means that there is also a risk of an abrupt change to the character within its ‘setting’. It is considered, however that

there are opportunities for new development in this area of the site to: be set back from the edge of the AONB; contain space for significant native tree planting around and between buildings; and use of appropriate materials and lighting to integrate it with its surroundings.

- 12.3.154 In conclusion, it is recognised that the site lies within the '*setting*' of the AONB. This too is recognised by adopted and emerging planning policy and planning policy guidance at national and local levels. The extent and vulnerability of the '*setting*' of the AONB, however, differs from area to area - from the North Downs scarp to its foot slopes, and from the Hythe escarpment to the Sandling Park – these last two areas being those which abut the site.
- 12.3.155 The most vulnerable part of the '*setting*' of the AONB within the study area, in relation to the site and the proposed Development, is that of the North Downs scarp, given the elevated views from it. As demonstrated in the paragraphs above, however, the site forms only one section of the mid-distant '*setting*' of this section of the AONB, and certainly not one that forms part of its immediate setting (a view as endorsed by section 2.3 page 2-45 of the SDC-PTR which states that "*broadly, land to the south and west of the A20 within Area B [the site] appears within the distant background of views from the North Downs Ridge, which includes views from the North Downs Way National Trail*"). Whilst there may be visual association between the scarp and the site this is diminished with: the distance they are apart, the proportion of the '*setting*' the site contributes to in the broad views from the scarp; and the variables associated with the weather and seasons that elevated land is more prone to.
- 12.3.156 There are also a few more individual and finer grained aspects of the AONB's '*setting*' that have a lesser importance, but which have been considered within the planning and assessment of the proposed Development, such as from the part of the AONB to the east of Newingreen, and parts of the scarp foot.
- 12.3.157 It is also evident, from the existing settlements within the '*setting*' of the AONB in this area (such as that of the villages of Brabourne Lees, Lympne and Sellindge), that successful integration of residential areas is achievable – albeit when controlled, planned, designed, implemented and managed, or allowed to evolve sensitively.
- 12.3.158 This is also the case when you consider other settlements in the '*setting*' of the whole of the North Downs escarpment. Image 12-13 shows the array of existing major settlements that have evolved overtime within the Vale of Holmesdale at the base of the North Downs, either at spring lines where the chalk and gault clay meet (such as Reigate, Bearsted, and Charing) or at the mouth of river 'gap's through the chalk escarpment (such as Guildford, Dorking, Sevenoaks, and Ashford). Many of the settlements (including Dorking, Reigate, Sevenoaks) have also take advantage of the elevation and stable ground of the greensand ridge, and sited their main streets, their churches, prime residential areas upon it.

Image 12-13 North Downs Escarpment through south-east England



Key:

Site location

North Downs escarpment

Greensand Ridge escarpment



12.3.159 It is also noticeable how many of the valued, established and promoted viewpoints along the North Downs escarpment are situated on the hill tops above these settlements, and orientated fully or partly towards them, where views to both the town, and the countryside are part of the enjoyment of the view. As shown on Image 12-14 to Image 12-18 these include: Reigate Hill and Colley Hill, above Reigate; Box Hill, above Dorking, Otford Mount, above Sevenoaks; White Horse Wood Country Park, above Maidstone; Broad Down, above Ashford, and Cheriton Hill, above Folkestone. This demonstrates that there is a valued association between the North Downs and the towns at their base.

Image 12-14 Location of established/ recognised viewpoints upon Ordnance Survey mapping, in relation to towns along the Vale of Holmesdale: Reigate: Colley Hill - grid reference: TQ 24946 52073 & Reigate Hill – grid reference: TQ 26255 52295

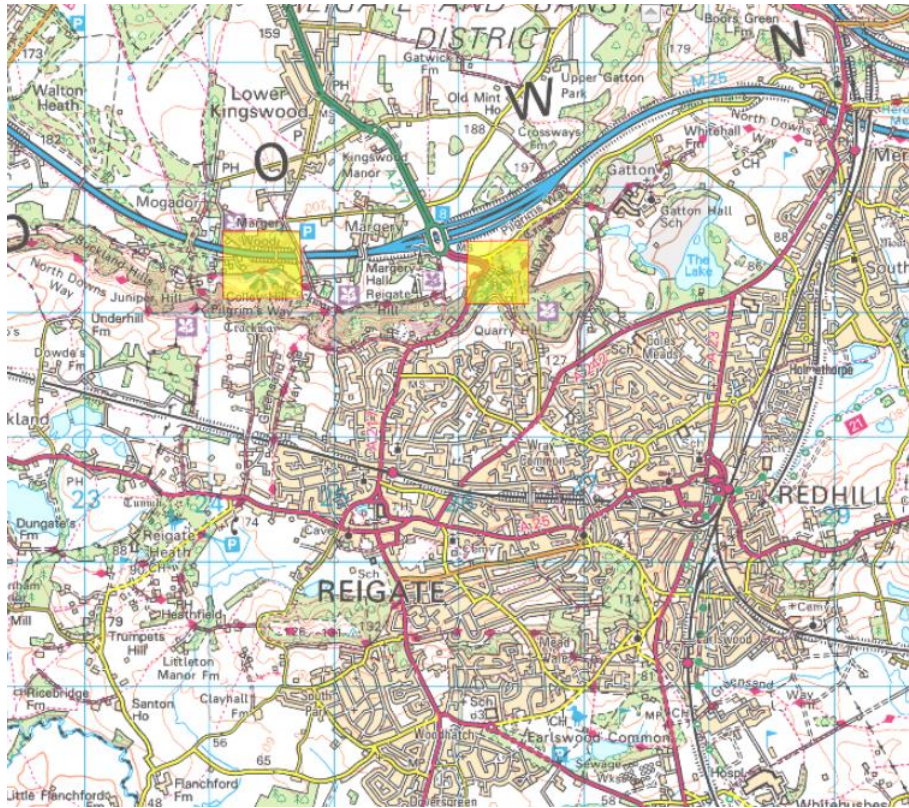


Image 12-15 Location of established/ recognised viewpoints upon Ordnance Survey mapping, in relation to towns along the Vale of Holmesdale: Sevenoaks: Otford Mount: grid reference: TQ 53669 59551



Image 12-16 Location of established/ recognised viewpoints upon Ordnance Survey mapping, in relation to towns along the Vale of Holmesdale: Sevenoaks: Maidstone: Detling Hill – grid reference: TQ 80603 58452

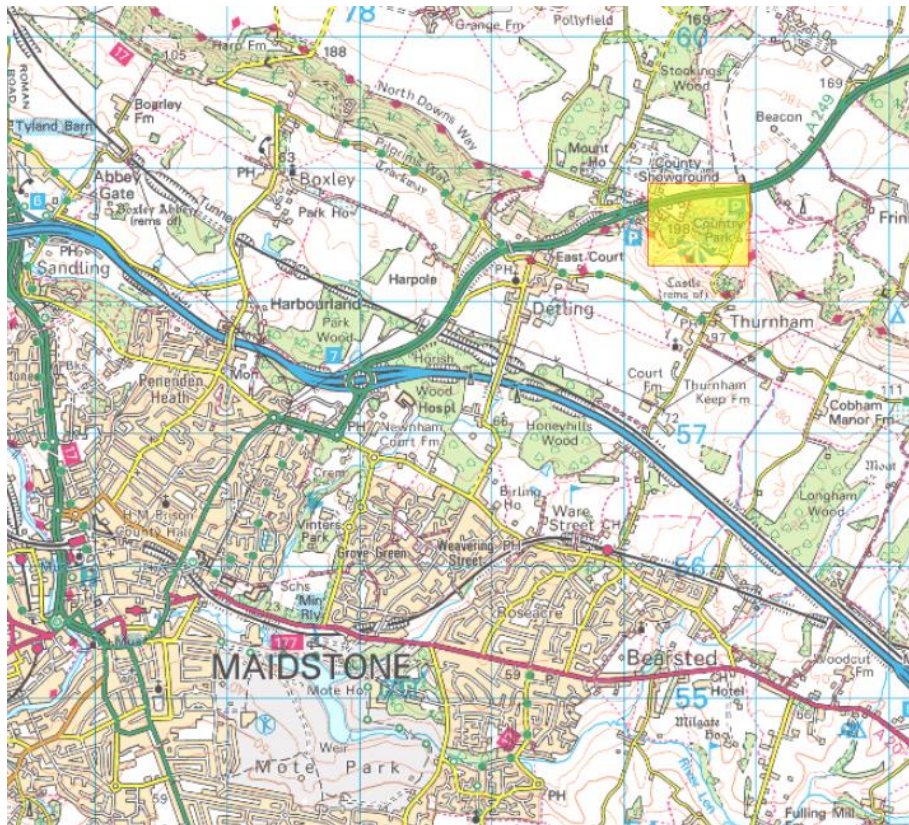


Image 12-17 Location of established/ recognised viewpoints upon Ordnance Survey mapping, in relation to towns along the Vale of Holmesdale: Ashford: Broad Downs – grid reference: TR 07921 45345



Image 12-18 Location of established/ recognised viewpoints upon Ordnance Survey mapping, in relation to towns along the Vale of Holmesdale: Folkestone: White Horse – grid reference TR 19834 38286



Special Landscape Areas

North Downs Special Landscape Area

- 12.3.160 The areas covered by the SLA designation within the study area are shown on Figure 12.2 and Figure 12.3. Within F&HDC this includes all areas covered by the AONB designation and a number of areas (totalling approximately 510ha) outside of this. Within the site with includes the triangle of agricultural land to the west of Stone Street and east of the Sandling Park. The land between junction 11 of the M20 and the AONB boundary to the north, including the village of Stanford, and two further parcels to the north and north-west of Sellindge are also included in this designation.
- 12.3.161 Whilst planning policy NE3 of the F&HDC-P&PLP states that the SLA within the F&HDC administrative area is “of countywide landscape significance” no published document provides a further description of the key characteristics or special qualities that convey this level of protection.
- 12.3.162 The designation does not continue into the ABC administrative area for the reasons stated in the ‘Ashford Landscape Character Assessment’ (ALCA):

“Special Landscape Areas (SLAs) were identified under the Kent and Medway Structure Plan (KMSP 2006) and rolled forward as such in the Ashford Borough Local Plan (2000) which sought to place the protection and enhancement of these areas above other planning considerations. However the KMSP was formally superseded by the South East Plan in May 2009 which reinforced the shift to criteria based policies, as eluded to in Planning Policy Statement 7. The SLA has therefore, in effect, been removed from the Statutory Development Plan and carries little weight in planning terms. It is considered that the Landscape Character Assessment will provide a greater clarity and depth of detail in relation to the countryside and the key characteristics and features that lie within it. This should provide a more robust local level of detail based on each landscape character area, rather than a blanket coverage.” (page 14)

Registered Parks and Gardens of Special Historic Interest

Sandling Park

- 12.3.163 As shown on Figure 12.3 Sandling Park lies immediately east the site on the opposite side of the A20 between Junction 11 of the M20 and Newingreen. The Park is listed as a RPGHI of Grade II status. The Park, house and gardens have remained in private ownership and are still a private residence. The grounds are opened for one day a year in aid of charity.
- 12.3.164 In total Sandling Park covers 177 hectares, of which, according to ‘Appendix 1: Theme 9 - Parks, Gardens & Estates’ of the F&HDC Heritage Strategy (Ref 12.33) (F&HDC-HS) thirteen hectares are formal and ornamental gardens and the remaining are parkland, farmland and woodland. It is parts of the Park’s farmland and woodland that abut the eastern edge of the site. At its closest Sandling Park House and its ornamental gardens are 560m from the site and separated from it by the 200m width of Home Wood and 360m of farmland. As such there is no inter-visibility between the two. This is confirmed by the ZTV (Figure 12.10).
- 12.3.165 South of the farmland the area known as Kiln Woods forms the remainder of the boundary between the site and the RPGHI. This is a densely treed, mature woodland that forms a robust buffer to the more designed parts of Sandling Park, and to the AONB in this area. The presence of the busy A20 trunk road along this boundary reinforces the separation between the Park and the site.

Port Lympne

- 12.3.166 As shown on Figure 12.3 the Grade II* RPGHI of Port Lympne lies at its closest point 300m to the south of the site, on the opposite side of the B2607 Aldington Road. The designated area covers 23 hectares, and according to the F&HDC-HS, seventeen of these are woodland, which mostly border its boundaries – including that between it and the site.
- 12.3.167 Port Lympne is open to the public as part of paid entry to *Port Lympne Animal Park*. The wider ‘estate’ of this 280ha recreational resource stretches far beyond the designated parkland, as shown on Figure 12.3. The visitor carparking is located on the same side of the B2067 as the site, and the reserve’s main visitor vehicular entrance (for private cars and the bus service that delivers visitors there from Folkestone and Hythe) is accessed via of a tree lined avenue off Otterpool Lane. Visitors then use a footbridge to cross the B2067 and into to the park. There are numerous entrances for staff vehicle off the B2067 along the length of its boundary with animal park estate.
- 12.3.168 The ornamental gardens around the main house of Port Lympne terrace down the slopes of the Hythe escarpment to maximise views across Romney Marsh. Numerous other maintenance buildings, lodges, cabins (for the overnight accommodation of guests) pepper the upper slopes of the estate.
- 12.3.169 As shown on Figure 12.3 there is little inter-visibility between the designated RPGHI of Port Lympne and the main animal park area with the site. The B2067 and its wooded fringes provide a buffer between them and land to the north. There are however views from the visitor entrance drive and car parking to the site, given the openness of these areas and lack of intervening vegetation.

Hatch Park

- 12.3.170 As shown on Figure 12.3 the Grade II RPGHI of Hatch Park lies 3.55km to the north-west of the site. Its heavily wooded eastern boundary prevents inter-visibility between it and the site.

Conservation Areas

Lympne

- 12.3.171 The Lympne conservation area, whose extent is shown on Figure 12.3, lies at its closest point 40m to the south-east of the site. The designated area primarily comprises of Lympne Castle, its outbuildings, St. Stephens Church, the ‘*County Members*’ public house, and the dwellings along The Street, that leads into the conservation area (CA) from the B2067 Aldington Road.
- 12.3.172 An appraisal for the Lympne CA (Ref 12.40) published in 2007 by F&HDC (then SDC) identifies that the designated area “*enjoys a secluded setting back from the B2067*” (paragraph 14), and that its main outlook is the “*commanding views from the top of the escarpment over the Marshes below*” (paragraph 35). A view endorsed by those they consulted with in the preparation of the CA appraisal (within in the appendix of the CA appraisal) and by the F&HDC-P&PLP. This document states that the “*church and castle enjoy a secluded setting back from the B2067, occupying an impressive vantage point on top of a shallow gradient cliff known as the Hythe Roughs*”.
- 12.3.173 The ZTV on Figure 12.10 shows that there would be inter-visibility between the site and the western edge of the CA, the small triangular green where The Street meets the B2067 In reality intervening hedgerows and tree belts along the Aldington Road and along the rear of the gardens of dwellings along The Street, which are not recorded upon the vegetation dataset used to compile the ZTV, substantially impede this.

Aldington Church

- 12.3.174 The Aldington Church CA, whose extent is shown on Figure 12.3, lies at its closest point 2.0km to the west of the site. The designation is located with the administrative area of ABC, but there is no currently available CA appraisal for this.
- 12.3.175 The CA contains the church of St Martin's, the churchyard, the site of a former Archbishop of Canterbury's palace the scattered dwellings along Church Lane to the north, and a group of fields to the east.
- 12.3.176 The ZTV on Figure 12.10 shows that there is inter-visibility between the CA and the site. In reality, the intervening hedgerows and tree belts surrounding the numerous fields between here and the site, which are not recorded upon the vegetation dataset used to compile the ZTV, substantially impede this.

Brabourne

- 12.3.177 The Brabourne CA, whose extent is shown on Figure 12.3, lies at its closest point 3.70km to the north-west of the site. The designation is located with the administrative area of ABC, but there is no currently available CA appraisal for this.
- 12.3.178 The CA contains the church of St Mary's, the village centre and Penstock Hall the administrative office of the AONB-Unit.
- 12.3.179 The ZTV on Figure 12.10 shows that there is inter-visibility between the CA and the site. In reality, the intervening hedgerows and tree belts surrounding the numerous fields between here and the site, which are not recorded upon the vegetation dataset used to compile the ZTV, substantially impede this.

Other Conservation Areas within the Study Area

- 12.3.180 Figure 12.3 shows the location of the other CAs within the study area that have the potential of having views to the site (those within the substantial built up areas of Ashford and Folkestone having been scoped out). The ZTV shown on Figure 12.10 and fieldwork that has been undertaken to ground-truth this has confirmed that inter-visibility between the site and these is substantially impeded by intervening vegetation and buildings.

Dark Sky Zone

- 12.3.181 The proposed 'dark sky zone' referred to ABC-LP policy ENV4 Light Pollution and Promoting Dark Skies is shown in Map 7 of the ABC-LP to extend to the edge of the Borough boundary – some 290m west of the site. The amplification of the policy states that it is the area around Woodchurch in particular (approximately 10km to the east of the site). that "*has been measured by global satellites as comprising one of the only areas in the county with no light detected*". The ZTV shown in Figure 12.10 shows the large number of substantial woodland blocks that lie between Aldington and Woodchurch which inhibit inter-visibility between the potential 'dark sky zone' and the site.

Landscape Character Receptors

- 12.3.182 Given that this assessment forms part of an OPA, and that, should permission be granted, further 'reserved matter' or detailed planning applications are likely to be required before the proposed Development could be implemented, this assessment considers the effects to the overall landscape resource in terms of effects upon LCAs as receptors (including their key landscape components, characteristics, and perceptual and aesthetic qualities) within the study area. An assessment of the effects on the finer grained physical landscape fabric of individual potential development plots of the site and its surrounds (i.e. individual hedgerows, trees, fieldscapes) would form part of further studies that may accompany future 'reserved matter' or detailed planning applications.

- 12.3.183 In accordance with GLVIA3 those LCAs used within the assessment as the landscape receptors should be those that are most up-to date, relevant (in their purpose), and detailed. As such, this assessment uses the geographic array, and identification of key landscape characteristics of those LCAs identified within the SDC-HLLA and the ABC-LC SPD for its landscape receptors.
- 12.3.184 As the aim of the SDC-HLLA's was to identify "*the relative sensitivity of the landscapes within Shepway District to strategic level development*", and as: it was prepared in light of the GLVIA3 and the NE-ALCA; utilises the existing landscape character assessments at national and county levels in its findings; and engaged stakeholders in its preparation, its use is wholly appropriate in this assessment.
- 12.3.185 Use of the ABC-LC SPD in the development control process is supported ABC-LP. This states at paragraph 5.314 that:
- 12.3.186 "All proposals coming forward should have regard to this SPD, and to the guidance on landscape characteristics that it provides, so as to ensure that new development does not compromise or damage landscape character... ."
- 12.3.187 Paragraph 3.14 of the ABC-LC SPD states that the AONB character areas are to be used where their own coverage is deficient: "[for] *the purpose of implementing local landscape character policies, the areas of land designated as AONB in the Borough will be treated as separate landscape character areas and guidance material on these AONBs should be obtained from the relevant AONB Unit.*" - i.e. such as the AONB-KDL and AONB-MP.
- 12.3.188 Using the findings from our analysis of these landscape character assessments and the other published landscape character assessments at national, county and local levels, as well as the ZTV, and supplemented by our fieldwork and our site-specific landscape character assessment, those LCAs within the study area that have the potential to experience significant effects arising from the proposed Development, and which are therefore used in landscape assessment are listed below:
- SDC-HLLA LCA:
 - SDC-05: Postling Vale
 - SDC-06: Stanford
 - SDC-07: Tolsford Hill
 - SDC-08: North Downs Ridge
 - SDC-09: Sellindge
 - SDC-11: Lympne
 - SDC-12: Brockhill
 - SDC-13: Greensand Ridge
 - SDC-21: Romney Marsh Proper Farmlands.
 - ABC-LC SPD LCAs
 - ABC-10: East Stour Valley
 - ABC-25: Aldington Ridgeline
 - ABC-29: Brabourne Lees Hilly Farmlands
 - ABC-30: Brabourne Arable Farmlands
 - ABC-31: Brabourne Farmlands.
 - AONB-KDL (in ABC)
 - ABC-AONB-01 Postling Vale - Stowting
 - ABC-AONB-02 East Kent Downs - Petham
 - ABC-AONB-03 Lympne - Aldington

- ABC-AONB-04 Lympne - Hythe Escarpment
- ABC-AONB-05 Lympne - Romney Marsh
- ABC-AONB-06 Stour Valley – Hampton.

12.3.189 The location of these, in relation to each other is shown on Figures 12.5 & 12.7.

12.3.190 As the methodology used to prepare the ABC-LC SPD, and the AONB-KDL differs from that of the SDC-HLLA (i.e. neither ABC-LC SPD or the AONB-KDL make judgements on the 'value' of each LCA or explicitly define their 'susceptibility' to 'strategic scale development') a degree of moderation has been required. This involved using the key characteristics from each SDC-HLLA, ABC-LC SPD and AONB-KDL LCA and applying the set of 'value' and 'susceptibility' criteria that is set out in the methodology to this assessment.

Visual Receptors

12.3.191 Analysis of the site and its surrounds through desk-top and fieldwork (throughout different seasons and differing weather conditions between 2016 and 2019) has identified the following Visual Receptors to the proposed Development.

Users of National Trails

12.3.192 National Trails (NT) are defined in the glossary of the NPPF as "*Long distance routes for walking, cycling and horse riding.*" There are two NT with the study area; the North Downs Way (NDW-NT) and the England Coast Path – see Figure 12.2 and Figure 12.3.

England Coast Path

12.3.193 The ZTV identifies that there are few locations along the England Coast Path from which the proposed Development may be visible. In reality, the array intervening buildings, coastal defences, other structures and vegetation along the coast prevents any views to the site. It is considered, therefore, that there are unlikely to be significant visual effects upon receptors using the path as a result of the proposed Development.

North Downs Way

12.3.194 The NDW-NT is a 153 mile path that starts in Farnham, in Surrey, and which follows the North Downs through the Surrey Hills AONB and into Kent, ending in Dover. Users of the NDW-NT have the potential to experience significant effects arising from the proposed Development.

12.3.195 With regard to the frequency of the path's use, paragraph 12.2 of the AONB-MP states that research by the NDW-NT Team "*shows an estimated 250,000 visitors use the trail each year between May and October.*" The AONB-MP also states that "*user surveys show that the majority of use on the North Downs Way tends to be for shorter walks.*"

12.3.196 Despite the preconception that the NDW-NT follows the scarp of the North Downs for its entire length, the route in fact drops down to the foot slopes (e.g. at Stowting within the study area), strays onto the dip-slope (e.g. for 3km between Broad Down and Brabourne Downs within the study area), and tracks across valley bottoms (such as that of the East Stour).

12.3.197 In addition, fieldwork in preparation for this assessment confirms that views to the site, from the length of the NDW-NT within the study area, are restricted on numerous occasions by landform and the scarp-top woodlands and hedgerows (a characteristic feature along the scarp) that are located to the side of the route.

12.3.198 There are also occasions when the views from the NDW-NT through the study area are completely unhindered, and wide panoramas out from it are possible. On the

clearest of days views from such locations through the study area can stretch up to 40km. Within these visual arrays, users of the trail have the potential to see as far as the High Weald ridges, the High Weald coast at Fairlight, the Dungeness peninsular, and further reaches of North Downs escarpment east and west.

- 12.3.199 The site is also potentially visible in such views but, depending upon the distances between it and the NDW-NT (which vary between 2.45km at its closest point and 8.00km at its furthest within the study area), it only forms a small part of these both horizontally and vertically, and not all of the site is visible in every view.
- 12.3.200 It is also evident from the research undertaken during the preparation of this assessment that generally beyond a distance of 5.0km upon the elevated ground of the North Downs a viewer's ability to distinguish the detail from a settlement is significantly compromised. Whilst awareness of the settlement is still clear from beyond 5.0km the distance causes the viewer to not readily visually engage with it as they would, should the conurbation be closer.
- 12.3.201 In addition, it must be noted, that given the NDW-NT's general north-west to south-east orientation, users' predominant visual experience, especially those on bicycles is angled along the line of the North Downs and not specifically towards the site.
- 12.3.202 The kinetic visual experience of the NDW-NT through the study area, and of the whole trail for that matter isn't, however, just one of secluded areas and panoramas. The, almost, constant awareness of the greensand ridge to the south and the Vale of Holmesdale that is formed between the two, is complemented by the frequent appearance of settlements at the foot of the scarp (such as Brook, Wye, Brabourne, Stowting, Postling, Etchinghill, Penne, and Folkestone) and in the middle distance (such as Ashford, Sellindge, Stanford, Brabourne Lees, Mersham, Lympe and Folkestone), and the moving, reflective and audible, ribbon of the M20 and HS1/Ashford-Folkestone railway line (see Image 12-13)
- 12.3.203 Analysis of the ZTV (Figure 12.10) identifies which general locations along the NDW-NT afford views to the site and proposed Development. Our own fieldwork to verify this has provided a more detailed understanding of the extent of the NDW-NT within the study area that the site is clearly, or partially visible from – See Figure 12.11. The descriptions below, moving north-west to south-east along the NDW-NT provide an analysis of those areas along it that do and do not have views to the site.
- 12.3.204 At the western end of the NDW-NT within the study area the site is visible, but only barely perceptible, in the wide panoramic, generally south-westerly views from Broad Downs (see representative VP01) – the scarp slope above the village of Brook and near to the area known as the Devil's Kneading Trough – a marked public-viewpoint on Ordnance Survey (OS) maps.
- 12.3.205 Between this area and Brabourne Downs the NDW-NT takes a route across the plateau and top of the dip-slope which, for approximately 3km, does not afford any views out across the Vale of Holmesdale, or to the site. After this and following approximately 300m of scarp-top panorama along the road that leads up Brabourne Downs (see representative VP02), the NDW-NT drops down the slope and behind intermittently dense vegetation. As such views out across the landscape and to the site are not possible for another 0.5km.
- 12.3.206 Views are then possible again along the stretch of the NDW-NT that follows the scarp-top directly above the village of Brabourne (see representative VP28). These views are then halted when the route drops down through woodland towards the village Stowting. There are a few glimpses to the site from this lower level where gaps in hedgerow vegetation allow, such as between Highfield Farm and Field View Farm along Scots Lane (see representative VP03) – where the NDW-NT follows a public highway. Views are also possible for a short while upon the climb up Cobb's Hill, but

for the majority of this approximate 3.0km section, until the route reaches the sharp bend in the B2068 Stone Street, between Cobb's Hill and Farthing Common, visibility is hindered by landform, buildings and vegetation.

- 12.3.207 The scarp-top path parallel to B2068 Stone Street through this area affords only vertically narrow views out across the Vale of Holmesdale to the site on account of the path being positioned slightly back from the crest of the scarp. In addition, views are noticeably hindered by vegetation in the middle distance directly south of the OS marked VP at Farthing Common car-park (see representative VP04). Between here and the Downs above Postling hedgerows and landform frustrate clear views to the site from all but short lengths of the NDW-NT (see representative VP05) as the route drops up and down, and in and out of this undulating, and vertically and horizontally incised part of the scarp.
- 12.3.208 The NDW-NT drops down to cross the gap in the Downs between Postling and Lyminge, and it is not until the path gets close to the crest of Tolsford Hill that clear uninterrupted views to the site are again possible (see representative VP06), due to landform and path side hedges. These views only last for a few hundred metres before the path moves away from the crest and drops down for approximately 2.5km through Etchinghill and across the Elham Valley Way.
- 12.3.209 The path continues through areas of visually impeding landform and vegetation for a further 1.6km and it is not until the path reaches the Peene Quarry Country Park that slightly lengthier clear interrupted views to the site are possible (see representative VP07).
- 12.3.210 Beyond the almost ninety degrees turn that NDW-NT takes within the Peene Quarry Country Park views to the site (some 5.5km from the site) becomes difficult on account of intervening landform. The views at this point are dominated by the Channel Tunnel Terminal at the foot of the scarp slope, and the town of Folkestone between this and the English Channel.

Users of Long Distance Footpaths

- 12.3.211 Figure 12.2 shows that there are a number of Long Distance Paths (LDP) within the study area. These include the Saxon Shore Way (SSW-LDP), the Royal Military Canal Path, and the Elham Valley Way.
- 12.3.212 The ZTV (Figure 12.10) indicates that there are no views to the site and the proposed Development from the Royal Military Canal Path, and the Elham Valley Way. As such there are unlikely to be significant visual effects upon receptors using these paths as a result of the proposed Development and are therefore scoped out of the assessment.
- 12.3.213 The ZTV shows that the inter-visibility of the Saxon Shore Way (SSW-LDP) with the site and the proposed Development is very limited but that there is the potential for users of it to experience significant effects arising from the proposed Development. The route of the SSW-LDP west to east through the study area (see Figure 12.2) first follows the old shoreline along the northern edge of Romney Marsh, before cutting across the Vale of Holmesdale and climbing up Tolsford Hill. It then shares the path with the NDW-NT until this runs out east of Folkestone. All but the section of the path that it shares with the NDW-NT at Peene Quarry has few views to the site on account of intervening landform, vegetation and buildings. Even where the SSW-LDP rises up to the top of the greensand ridge scarp slope and is at its closest point to the site (approximately only 60m away), views between the two are screened by buildings and dense intervening tree, hedge and scrub vegetation (see representative VP29).

12.3.214 Further along its length, to the south-east the hedgerows along the Aldington Road and the dense vegetation of Folks Wood screen views from the SSW-LDP to the site. To the west intervening vegetation and landform screen views to the site from the SSW-LDP (see representative VP12).

Other Public Rights of Way

Public Rights of Way Within the Site

12.3.215 The ZTV (Figure 12.10) demonstrates that users of every part of the PRow within the site (see Figure 12.3) would have views to the proposed Development. As such, users of these paths have the potential to experience significant effects arising from the proposed Development.

12.3.216 The degree of visual openness experienced by users of these paths (which are predominantly pedestrians, although there is one bridleway between the settlement of Barrow Hill and the railway line) varies, but in most instances it comprises: views across agricultural land, plus the farmsteads associated with these; the built-up edges to the settlements, and the domesticated paraphernalia of Westenhanger, Newingreen, Barrow Hill, Lympne, Sellindge and Stanford; scattered dwellings; tree belts, woodland hedgerows and shaws; and the local road network.

12.3.217 Users of nearly all the PRow within the site also experience views to significant elements of infrastructure and non-settlement/non-agricultural-related built form. This includes:

- the large scale and tall buildings, fencing, non-native and coniferous vegetation, artificial landforms, communications mast, and associated paraphernalia of Lympne Industrial Estate;
- the assorted buildings, fencing and distinctive landscape form of the redundant Folkestone Racecourse;
- the vehicle movement, embankments, heavily engineered bridges, lighting, overhead cables, signage, acoustic fencing and other infrastructure associated with the M20 and HS1/Ashford to Folkestone railway;
- the large scale buildings, extensive car parking, movement, lighting, signage, and access roads associated with the motorway services and Westenhanger Railway Station;
- the signage, access road, ornamental tree and shrub planting, extensive carparking and other infrastructure associated with the Port Lympne Animal Park; and
- the high-voltage electricity pylons that march across the north-west corner of the site.

12.3.218 In addition to this:

- PRow HE316 (between Harringe Brooks Wood and Otterpool Lane) (see representative VP17), HE302 (between Harringe Court and the East Stour River), and those PRow around Hillhurst Farm (see representative VP09) also experience clear views to the escarpment on the North Downs in the middle to long distance;
- Only users of PRow HE227 and HE275 (see representative VP21) experience clear views to Westenhanger Castle. The vegetation and racecourse buildings around the Castle prevent views from other PRows to it;

- The dense network of woodland, tree belts and hedgerow vegetation that exists along the Aldington Road past the site and further east and west along this road, along with the existing buildings of the Lymgne Industrial Estate and Lymgne village prevent views from the site's existing network of PRow to the south;
- Harringe Brooks Wood, Springfield Wood and the minor north-south ridge between Court-at-Street and Harringe Court prevent views from PRow within the site from extending beyond these to the west; and
- Likewise, Kiln Wood (within Sandling Park) and Folks Wood, along with the linear settlements of Lymgne and Newingreen, that collectively stretch between the Aldington Road and the A20 prevent more than near distance views from PRow within the site to the east.

12.3.219 Apart from the views to the North Downs escarpment from PRow within the site, highlighted in the preceding paragraph, other views northwards are restricted by: the buildings and mature vegetation around the built-up area of Folkestone Racecourse, around the Westenhanger Castle complex and around the settlement of Barrow Hill; and the extensive embankments of the M20 and HS1/Ashford-Folkestone railway, and the vegetation and acoustic fencing along them.

12.3.220 It is notable that many of the PRow through and immediately surrounding the site end abruptly at roads, are without onward connections to other paths or settlements (such as HE275, HE281, HE281A, HE303, HE315 and HE316), or have historically been severed by the Ashford-Folkestone railway. Such routes do not so readily form circular walks, or satisfactorily long trails for users, and hence our assumption is that they receive relatively little use, compared to other PRow in the study area.

12.3.221 Overall, it is notable that, in comparison to equivalent areas of land upon the greensand ridge, such as that around Aldington (see Figure 12.2 and Figure 12.3) that there is distinct scarcity of PRow within and around the site.

Public Rights of Way Outside of the Site

12.3.222 Those PRow beyond the site can be categorised as those that are:

- localised/ close range i.e. 0-2km from the site boundary;
- intermediate/ medium range i.e. 2-5km from the site boundary; or
- wide/ long range i.e. beyond 5km from the site boundary.

12.3.223 Views from localised PRow to the south of the site (including footpaths HE318 and HE20, and bridleway HE317) are substantially restricted by vegetation and built development along the Aldington Road (as highlighted in paragraph 12.3.213), and the landform and wooded nature of much of the Hythe escarpment. These factors, also prevent views from PRow in the intermediate range of the site – i.e. through Romney Marsh. Medium range views from those PRow that align with the slithers of visibility shown on Figure 12.10, further south within the Marsh, are screened by existing vegetation on the Hythe escarpment and between fields within the Marsh itself that has not shown up on the ZTV. This too applies to those areas of visibility that have apparent longer-range views to the site through the Marsh. It is therefore considered that there are unlikely to be significant visual effects upon receptors using PRow through this area as a result of the proposed Development. Subsequently these receptors are scoped out of the assessment.

12.3.224 To the west of the site there are occasional localised views to it from: parts of PRow HE316 (between Aldington Road and Harringe Brooks Wood) and the other two PRow (HE330 and HE329) that emerge from the slope of the Hythe escarpment on to the B2046 (see representative VP11); the very northern end of HE325 (see

representative VP14); and HE302 between Harringe Lane and Harringe Court. Views from these locations are of the western most areas of the site only.

- 12.3.225 Further west, beyond these locations views to the site and the proposed Development from PRow in the medium and long range from this direction are thwarted by the undulating nature of this part of the greensand ridge dip-slope, which gradually diminishes in elevation towards Ashford, and the pattern of large woodland blocks (such as Burch's Rough, a designated Ancient Woodland, Backhouse Wood, Stockhills Wood and Poulton Wood), combined with an increasing numeracy of tree belts, shaws, hedgerows, and hedgerow trees. Representative views have recorded from some of the higher and more sensitive locations through this area – see VP's 12 and 13.
- 12.3.226 To the immediate north of the site the extensive embankments of the M20 and the HS1/Ashford-Folkestone railway, the vegetation and acoustic fencing along them, and the ridge of higher land that lies between them, all combine to prevent views from the most localised of PRow.
- 12.3.227 Further north from here, the localised PRow between the villages of Sellindge and Stanford (including footpaths HE220, HE226, HE262, HE 270 and parts of bridleway HE271) have views to the site, albeit these are restricted in verticality by the screening properties M20/railway zone. The landscape here is more open in nature (see VP27) so allowing views to the majority of the east-west breadth of the site. The large scale, bright white buildings within the Lympne Industrial Estate are nearly always visible, as is the movement, embankments, heavily engineered bridges, lighting, overhead cables, signage, acoustic fencing and other infrastructure associated with the M20 and the HS1/Ashford to Folkestone railway and the high-voltage electricity pylons that span across this area. On occasions the buildings of the redundant Folkestone Racecourse, the large-scale buildings, extensive car parking, movement, lighting, signage, and access roads associated with the motorway services are also clearly visible.
- 12.3.228 Between the villages of Sellindge and Brabourne Lees views from PRow become far less numerous (see Figure 12.10) and more glimpsed (see VP25). The landscape through this area becomes more incised, there is greater level of tree cover and the settlement pattern includes more numerous scattered dwellings, which combine to restrict visibility from this area to the site.
- 12.3.229 Between the villages of Brabourne and Postling there are glimpsed intermediate views of parts of the site (see VP27) from PRow as the land rises gradually to the foot of the North Downs Scarp slope. Lengthier and clearer views are not possible because of the increasing undulations in the landforms, the larger blocks of woodland, and the frequency of tree belts and hedgerows through this area.
- 12.3.230 Within the study area, north of the site, the face of the escarpment of the North Downs itself has relatively few PRow. Some of those that do exist climb straight up the steep scarp face – such as those at Brabourne Downs, whilst others use the initially gentler slopes of the combes – such as to the east of Etchinghill. As such, the length of general outward views across the adjoining landscape from these paths varies considerably, as does, consequently the ability to observe the site. Clear visibility is also impeded by the fact that the lower slopes of the North Downs scarp are generally divided into medium to small fields surrounded by shaws and overgrown hedges. Views of the site that are gained are of intermediate and long range. And whilst, on occasions a wide breadth of the site may be possible, it only constitutes a narrow vertical part of such views at such a distance.
- 12.3.231 Along the crest and top of the escarpment there are also relatively few PRow other than the NDW-NT itself. The views to the site are, expectedly, similar to those described in paragraph 12.3.194.

- 12.3.232 As shown on Figure 12.10 views from PRow to the east of the site are substantially restricted by the large blocks of woodland within Sandling Park, the vegetation between the Park and Pedlinge, and by the landform falling away to Saltwood and Hythe.
- 12.3.233 The conurbation of Lympe, that stretches from the crest of the Hythe escarpment to the bottom of the valley, and which almost conjoins with that of Newingreen, prevents clear views into the site from the south-east. The buildings and relatively dense garden vegetation combine to make this stretch of Stone Street a strong visual edge to the site from the countryside to the east.
- 12.3.234 Despite this, three PRows are located at close range to the site's eastern boundary. These are: PRow HE281 which emerges from the woodland of Sandling Park, halfway between Junction 11 of the M20 and Newingreen, and then continues over the landform of Hillhurst Farm to Westenhangar (see VP09); PRow HE313 that heads north from the escarpment crest at Shepway Cross and terminates at Newingreen (see VP10); and HE293 that skirts around the northern edge of Lympe and emerges at Berwick Farm, before entering the site and cutting across to the A20 at the western end of Newingreen (See VP19).
- 12.3.235 It is therefore considered that: users of localised/close range PRow, within 2km to the north, south and west of site; users of localised/close range PRow, within 2km to the north and east of the site; and users of intermediate/medium range PRow, between 2-5km to the west and north of the site have the potential to experience significant effects arising from the proposed Development.

Areas of Recreation

Open Access Land

- 12.3.236 Figure 12.2 shows the location of *Open Access Land* (designated as part of the CRow Act 2000) within the study area. The closest of these – Gibbin's Brook, which lies 650m to the north of the site, is predominantly wooded and so affords very few clear views to the site. It is considered therefore that there are unlikely to be significant visual effects upon receptors using this land as a result of the proposed Development
- 12.3.237 The remainder of *Open Access Land* within the study area that have views to the site are all located upon the scarp slopes of the North Downs (apart from the large expanses of woodland upon the dip-slope of the North Downs that Figure 12.10 shows are outside of the ZTV, and are therefore scoped out of the assessment). This includes locations such as Broad Downs, Brabourne Downs, the downland north-west of Postling, parts of Tolsford Hill, and Peene Quarry Country Park. Given the open nature of much of these area views to the site are possible (see VP02 and VP05). Users of these area have the potential to experience significant effects arising from the proposed Development.

Country Parks

- 12.3.238 As highlighted in the preceding paragraph, views to the site are possible from Peene Quarry Country Park, which at its closest point lies 5.09km to the north-east of the site (see VP07). As such, users of this area have the potential to experience significant effects arising from the proposed Development.
- 12.3.239 The only other Country Park within the study area is Brockhill, which lies 1.37km to the east. Given its location within the incised valleys around Saltwood there would be no inter-visibility between this area and the site, as affirmed upon the ZTV – Figure 12.10. As such, users of this area are considered not have the potential to experience significant effects arising from the proposed Development and are scoped out of the assessment.

Sandling Park

12.3.240 As described in paragraph 12.3.163, Sandling Park is only publicly accessible for one day a year. It is expected that on such occasions users predominantly visit the ornamental gardens surrounding the main house that has no views to the site, and hence would not view the proposed Development. It is considered, therefore, that there are unlikely to be significant visual effects upon receptors using the Park as a result of the proposed Development. Subsequently these receptors are scoped out of the assessment.

Lympne Recreation Ground

12.3.241 Whilst Figure 12.10 indicates that there is visibility to the site and potentially the proposed Development from Lympne Recreation Ground, the intervening buildings of this upper part of the village, and the vegetation around them, that hasn't been taken into account on the ZTV, prevents this. It is considered, therefore, that there are unlikely to be significant visual effects upon receptors using the area as a result of the proposed Development. Subsequently these receptors are scoped out of the assessment.

Port Lympne Animal Park

12.3.242 As described at paragraph 12.3.167 visitors to Lympne Animal Park arriving by car or by public transport do so off Otterpool Lane, along the south-eastern edge of the site (see VP17). The vegetation along the sinuous entrance drive to the car parking areas of the Animal Park is relatively sparse so clear views over the southern-most parcels of the site, between Harringe Brooks Wood and the Lympne Industrial Estate are possible. As such, users of this area have the potential to experience significant effects arising from the proposed Development.

Westenhanger Castle

12.3.243 Westenhanger Castle lies just along the northern boundary of the central part of the site. The 14th century manor house and complex of stone and brick outbuildings is privately owned but is hired for weddings and events and occasional tours.

12.3.244 Views out from the complex are substantially constrained by dense tree belts and mature trees in the grounds of the castle to the south and east. The vegetated embankment of the Ashford-Folkestone railway forms an incongruous boundary approximately 150m to the north. Views out from the east of the castle complex are less constrained by vegetation but a number of Racecourse buildings lies just outside of its boundary which currently restrict views.

12.3.245 The Castle buildings are visible from parts of PRoW HE275 (see VP21) that runs from the A20 Ashford Road to the railway, approximately 180m to the west of the complex. This PRoW joins up with PRoW HE277 that runs parallel to the Ashford-Folkestone railway. This too has views to the castle for parts of its length. The views of the Castle from these paths are short in range and constrained at their rear by the dense vegetation that surrounds the buildings. As such the Castle currently has a sense of being visually cut-off from the immediate and wider landscape that surrounds it.

12.3.246 As such, users of Westenhanger Castle have the potential to experience significant effects arising from the proposed Development.

Folkestone Racecourse

12.3.247 Folkestone Racecourse has been redundant as a horseracing venue since 2012. It has hosted a series of 'war and peace time' revival annual events since this – the last in 2016. The majority of the Racecourse buildings and facilities would be demolished to make way for the proposed Development. It is considered, therefore, that there are

unlikely to be significant visual effects upon receptors using the Racecourse as a result of the proposed Development. Subsequently, users of the Racecourse are scope out of the assessment.

Lympne Castle & St. Stephen's Church

12.3.248 Together with a number of outbuildings and private dwellings constructed from the same ragstone, the complex of Lympne Castle and St Stephens form a distinct area of the village, and are part of the Lympne CA. The publicly accessible graveyard of the church (in which two PRoWs terminate) has spectacular long distance views over Romney Marsh. The Castle, which is adjacent to the church, is a privately owned 13th century manor house that opens its doors for weddings, events and occasional tours. Its outbuildings also contain a café and a local produce shop.

12.3.249 As described in paragraphs 12.3.171 to 12.3.173, inter-visibility between this part of the village and the site is prevent by numerous buildings, walls and areas of vegetation that characterise this area. It is considered, therefore, that there are unlikely to be significant visual effects upon receptors using this area as a result of the proposed Development. Subsequently, users of this area are scope out of the assessment.

Lympne Airfield

12.3.250 The land immediately to the west of Lympne, along with the plot upon which the Lympne Industrial Estate now sits, once formed Lympne Airfield. The open space between these two built-up areas, upon the brow of the greensand ridge's dip slope, contained amongst other things, the airfield's concrete runway. Aligned north-west to south-east its route is currently marked by the scrub vegetation that has grown up between the cracks in the concrete and which has consequently avoided the mowing of the grass areas surrounding it.

12.3.251 The wide expanse of grass either side of the runway is currently neither farmed nor apparently used for any other particular purpose. Whist this area is privately owned, access to it for pedestrians has been made at its south-eastern corner. As such the area has become well used by dog walkers.

12.3.252 The Industrial Estate and the village of Lympne visually contains this area to the west and east, respectively, and the dense vegetation either side of Aldington Road prevents views out to the south. Views northwards over Newingreen, the Racecourse, the M20 and to the North Downs escarpment are possible, but occasionally impeded by vegetation or by the 6m high earth bund that lies east-west along the northern edge of the old Airfield (see VP18). As such, users of this area are considered to have the potential to experience significant effects arising from the proposed Development.

Existing Settlements

Lympne

12.3.253 The village of Lympne lies upon the dip slope and crest of the greensand ridge. Its built-up area is generally centred around the old Roman road of Stone Street, with the majority of dwellings on the western side of this, and around the junction with the ridge-top Aldington Road. It is a settlement of around 1,500 inhabitants that contains a village hall, a convenience store/post office, a hairdresser and a pub.

12.3.254 The village is relatively compact and densely built-up with a predominance of low-built houses set in mature gardens. This substantially confines publicly accessible views out from most parts of the village to the countryside beyond to just its edges and the occasional glimpsed view along those north-south aligned roads through the settlement. As such, residents and users of Lympne are considered to have the potential to experience significant effects arising from the proposed Development.

Newingreen

- 12.3.255 The settlement of Newingreen lies at the bottom of the greensand ridge dip-slope and is centred along the roads emanating from the junction of Stone Street with the A20 Ashford Road. The settlement's dwellings solely lie along these roads. The large business premises of Holiday Extras is set back from the village's northern edge within maturely vegetated grounds, which prevents views northwards from the core of the village.
- 12.3.256 There are views out from the edges of the settlement to the countryside beyond, including across the old Racecourse site (i.e. from the dwelling of Honeypot), across the triangular plot of Hillhurst Farm and across farmland to Lympne and the old Airfield site. As such, residents and users of this settlement are considered to have the potential to experience significant effects arising from the proposed Development.

Scattered settlement along the A20 within the site boundary

- 12.3.257 To the west of Newingreen along the A20 there are a groups of more widely dispersed and scattered dwellings that sit within the site boundary. These are: Elms Acres, The Willows, The Bungalow, Rose Cottage, Killymoon, and The White House, Benham Water Farm, Whiteways, Boleh, Red House Farm, Cydonia, Cobtree Cottage, 2 Franks Villas, Quorum (Ivy Cottage), Craylands and Elms Farm.
- 12.3.258 Most of the properties are located on the south side of the A20, however a few exist on the north side as well. Whilst almost all dwellings front on to the road, they are generally separated from it by garden areas and structural boundary vegetation.
- 12.3.259 There are broad, pleasant views out from some of these dwellings northwards across the race course and farmland to the motorway/railway corridor and to the North Downs escarpment on the horizon. Where views southwards are possible, these extend across contain the open fields on the land either side of the tributary of the East Stour River, and the areas of grass land on the rising ground leading to tow the old Lympne airfield and the settlement of Lympne. Views east and west from these mainly contain sight of the other buildings, garden vegetation and domestic curtilages of adjoining dwellings – apart from those at the edges of these groups, which look out over further farmland to scattered settlements in the distance. Views from some of the gardens and domestic curtilages of these properties are occluded by structural vegetation and by outbuildings within the land holdings.

Westenhanger

- 12.3.260 The settlement of Westenhanger, like Lympne, is centred along the old Roman road of Stone Street.
- 12.3.261 The small number of properties that exist here are predominantly situated upon the western edge of the road (only three properties lie on the eastern side of Stone Street) and face the tall over-mature, but narrow hedgerow that borders the site in front of them. As such there are glimpsed views from this built-up edge across the Hillhurst Farm triangle part of the site (see VP20).
- 12.3.262 Most of the dwellings that front immediately onto Stone Street are densely assembled, so along with the mature vegetation contained in their rear gardens, which stretch out to the edge of the boundary with the old Folkestone Racecourse, this visually contains views outward from the settlement to the west. There is, however, a small collection of houses along Meadow Close that lie back from Stone Street. Whilst most of these dwellings have mature vegetated gardens that help to visually contain this edge of the settlement, a few have more open aspects to the west, across the old Racecourse.
- 12.3.263 A more open aspect, with views east and west into the site, occurs at the very northern edge of this linear settlement, where house become more sporadic, the

Racecourse frontage opens up, and the bounding hedgerows are less mature, dense and tall. As such, residents and users of this settlement are considered to have the potential to experience significant effects arising from the proposed Development.

Barrow Hill, Sellindge

12.3.264 The settlement of Barrow Hill, Sellindge comprises the linear group of dwellings that lie along the A20 Ashford Road between its junction with Otterpool Lane in the south, to the overbridges of the M20 and HS1/Ashford–Folkestone railway line in the north.

12.3.265 The settlement's dwellings are tightly assembled, which, along with the mature vegetation within their rear gardens (especially those on the east side of the A20) prevents clear views out east and west to the site from the centre of the settlement. The northern end the A20 through the settlement of Barrow Hill falls in elevation to the East Stour River and Grove Bridge. The visually constraining properties of the vegetation around the river through this northern part of the settlement are compounded by the tall, vegetated embankments of the railway and motorway to prevent views out to the site on either side.

12.3.266 At the southern end of the settlement of Barrow Hill, where properties only lie on the western edge of the A20, there is a more open aspect to the countryside. Views, of intermediate length, from the Ashford Road span across the open landscape and the flat straight chute of the old Racecourse. Long distance, and vertically narrow views to the escarpment of the North Downs are also possible (see VP16). Views to the south, from this part of the settlement, are relatively more constrained. The large layby here is used regularly by lorries, and the property at the very southern end of the settlement is surrounded by a woodland and thick tree belts. Where views are possible they stretch up to near the brow of the greensand ridge between Harringe Brooks Wood and the woodland immediately north of the unfinished extension to the Lymne Industrial Estate.

12.3.267 As such, residents and users of this settlement are considered to have the potential to experience significant effects arising from the proposed Development.

Sellindge

12.3.268 On the north side of the M20 and railway overbridges lies the village of Sellindge. It is a settlement of around 1,400 inhabitants that has a convenience store/post office, a village hall, a pub and a few shops.

12.3.269 As with the settlements of Barrow Hill and Newingreen, it is predominantly shaped by the main road that runs through it. Dwellings sporadically stretch for almost 2km from the motorway crossing at its south-eastern end to Stone Hill and the village church of St Mary's at the far west of the village. A further, more dense area of houses exists on the north side of the A20 around Swan Road.

12.3.270 Whilst the ZTV on Figure 12.10 indicates that much of the village has views to the site and potentially to the proposed Development, this does not take into account the visually constraining properties of the embankments, fencing and vegetation that line the motorway and railway. Along with mature trees and hedges that line the A20 through the village, these combine to prevent views to the site from the majority of the settlement.

12.3.271 There are, however, occasional views to parts of the site from PRoW HE273 that emerge from its south-eastern edge of the village (see VP25). As such, residents and users of this settlement are considered to have the potential to experience significant effects arising from the proposed Development.

Stanford

12.3.272 The village of Stanford lies directly upon the opposite (northern) side of the M20 and HS1/Ashford-Folkestone railway from the settlement of Westenhanger. Like its neighbour, this village is predominantly formed around Stone Street, that runs almost due north through the settlement.

12.3.273 Whilst the ZTV (Figure 12.10) indicates that much of the village has views to the site and potentially to the proposed Development, this does not take into account the visually constraining properties of the embankments, fencing and vegetation that line the motorway and the railway. Along with the mature trees and hedges that exist along the rear of most of Stanford's dwellings, particularly around those at its southern end, these combine to prevent views to the site from the majority of the village.

12.3.274 Along Kennett Lane (where the Stanford windmill is located), and along the numerous PRoW heading west from the settlement (see VP27) views to the site, in particular the dip-slope of the greensand ridge, become substantially clearer. As such, residents and users of this settlement are considered to have the potential to experience significant effects arising from the proposed Development.

Court-at-Street

12.3.275 Court- at-Street is a settlement of around twenty dwellings lying approximately 1.3km to the south-west of the site along the B2067 Aldington Road. Its position upon the crest of the Hythe escarpment affords it spectacular, albeit glimpsed views (through intervening vegetation) across Romney Marsh.

12.3.276 The settlement's elevation also give rise to possible views to the southern and western portions of the site – as indicated upon the ZTV (Figure 12.10). The layers of intervening vegetation surrounding properties within the settlement and between it and the site, as well as the hedgerows that abound local roads (such as Harringe Lane) in reality substantially restrict these (See VP11). As such, residents and users of this settlement are considered to have the potential to experience significant effects arising from the proposed Development.

Aldington

12.3.277 The main settlement of Aldington lies approximately 3.25km to the west of the site. The smaller area of dwellings, separate from the main village, around St Martin's Church is approximately 2.15km away. The visual setting of this is discussed in earlier in this section. As such, residents and users of this settlement are considered to have the potential to experience significant effects arising from the proposed Development.

12.3.278 Whilst the ZTV (Figure 12.10) indicates that some parts of the main village have views to the site and potentially to the proposed Development, this does not take into account the visually constraining properties of the mature trees and hedges that exist through the settlement. It does not also take into consideration the intervening hedgerows and tree belts surrounding the numerous fields between here and the site, which are not recorded upon the vegetation dataset used to compile the ZTV, but combine to prevent views occurring. It is considered, therefore, that there are unlikely to be significant visual effects upon receptors within the village as a result of the proposed Development and, subsequently, they are scoped out of the assessment.

Brabourne

12.3.279 The inter-visibility between the site and the village of Brabourne is discussed in paragraphs 12.3.177 to 12.3.179. Whilst the ZTV (Figure 12.10) shows that there is inter-visibility between the CA and the site. In reality, the intervening woodland,

hedgerows and tree belts surrounding the numerous fields between here and the site, which are not recorded upon the vegetation dataset used to compile the ZTV, substantially impede this. The few public views that are possible are at least 3.70km away. As such, residents and users of this settlement are considered to have the potential to experience significant effects arising from the proposed Development.

Postling

12.3.280 The ZTV (Figure 12.10) indicates that there is a degree of inter-visibility between the village of Postling and the site. This does not, however, take into account the visually constraining properties of the mature trees and hedges that exist around the dwellings the village, which combine with the intervening hedgerows and tree belts between the settlement and the site that prevent clear views between the two. It is considered, therefore, that there are unlikely to be significant visual effects upon receptors in the village as a result of the proposed Development and, subsequently, they are scoped out of the assessment.

Hythe

12.3.281 As indicated on the ZTV (Figure 12.10), there is very little inter-visibility between Hythe and the site. The town's position at the coastal level, and the wooded incised valleys surrounding it, prevents views between the two. It is considered, therefore, that there are unlikely to be significant visual effects upon receptors in the town as a result of the proposed Development and, subsequently, they are scoped out of the assessment.

Individual Residential Properties within the Site Boundary

12.3.282 In addition to those scattered dwellings along the A20 (described in 12.3.257) residential receptors at individual dwellings, outside of the main settlements, within the site boundary which have to potential to experience significant effect as a result of the proposed Development include (as listed in Appendix 3 of the OP-DS and by drawing OPM(P)2018_YY – 'Existing Buildings to be Demolished & Retained'):

- Farm Cottage (to the west of Westenhanger Castle);
- Tollgate Cottage (at the north end of Stone Street near to Westenhanger Station); and
- Hillhurst Farmhouse (the farmhouse in the centre of the complex of farm buildings).
- Sommerfield Court Farm (to the west of the settlement of Barrow Hill)

Individual Residential Properties outside the Site Boundary

12.3.283 Residential receptors at individual dwellings outside of the main settlements, in the environs of the site boundary which have to potential to experience significant effect as a result of the proposed Development include: Twin Chimneys and Little Greys on Stone Street near Westenhanger; Little Berwick, Berwick House and Berwick Manor on Stone Street, near Lympne; Nowell Cottage, Old Mill Cottage, The Lodge on the Aldington Road between Lympne and Court-at-Street; Otterpool Manor; Upper Otterpool; Barrow Hill Farm; Harringe Court; and Harringe Court Cottages.

Highways

M20

12.3.284 The M20 runs generally parallel with the northern boundary of the site. Along its length through this area the carriageway graduates between cutting and embankment. When located upon an embankment, such as between Sellindge and the settlement of Barrow Hill, there is the potential for views into the site. Whilst there are occasional glimpses in winter months from here to the upper part of the

greensand ridge dip slope, the majority of views are restricted by the tall roadside acoustic fencing, and either by vegetation along the embankment or by vegetation along the railway lines, that lies between the M20 and the site. It is considered, therefore, that there are unlikely to be significant visual effects upon the receptors using the M20 as a result of the proposed Development.

- 12.3.285 Users of Junction 11 of the M20 are provided with an occasional more elevated view to the site from the interchange above the main carriageways, where breaks in the roadside vegetation allows. From here it is possible to gain vertically narrow occasional glimpses across Hillhurst Farm to the top of the triangular area it sits within, and above this to the wooded crest of the greensand ridge.
- 12.3.286 Users of the Folkestone Service station, that lies between the M20 and the HS1/Ashford-Folkestone Railway Line, also have occasional views to Hillhurst Farm, and this north-eastern most part of the site. As such, users of this area and the Junction are considered to have the potential to experience significant effects arising from the proposed Development.

A20 Ashford Road

- 12.3.287 The A20, which stretches from Dover to south-east London, cuts through the centre of the site – beginning at its north-east corner, then through Newingreen and the settlement of Barrow Hill, to its exit at Sellindge.
- 12.3.288 Open views across the triangular parcel of land containing Hillhurst Farm are possible from the eastern stretch the road, between the M20 and Newingreen (see VP11). The landform of the Hillhurst area, the vegetated edges of Sandling Park and Westenhanger, and the greensand ridge constrain longer distance views. When heading north-east along this part of the A20 the escarpment of the North Downs is visible on the horizon.
- 12.3.289 Between Newingreen and the settlement of Barrow Hill views southwards from the road are generally constrained by the sporadic settlement along it, whilst lengthier open views exist to the north (see VP22). From here views to the buildings of the old Folkestone Racecourse and it's the white fenced gallops, as well as the farmland between it and the settlement of Barrow Hill are possible. The escarpment of the North Downs forms the horizon above these views. As such, users of this road are considered to have the potential to experience significant effects arising from the proposed Development.

Stone Street

- 12.3.290 As described in paragraphs 12.3.253, 12.3.260 and 12.3.272, the views from Stone Street are generally confined when the road runs through the villages of Lympne, Westenhanger and Stanford.
- 12.3.291 For the short stretch between Lympne and Newingreen there are glimpsed views into the site, which lies immediately beyond the hedgerow to its west. From here views to Lympne Industrial Estate, and the land rising up between this and the village of Lympne, are possible (see VP19). As such, users of this road are considered to have the potential to experience significant effects arising from the proposed Development.

Otterpool Lane

- 12.3.292 Otterpool Lane cuts a north-south line through the central-southern portion of the site. When heading northward on this road and when users of it are beside the entrance to Port Lympne Animal Park, with the mass of the Lympne Industrial Estate to the immediate east, views are possible over the south-eastern corner of the site. In the distance is the wooded backdrop of Harringe Brooks Wood and the North Downs escarpment (see VP17).

12.3.293 As the road drops down the dip-slope of the greensand ridge, views out from it are constrained by the small cutting the road sits within, and by the roadside vegetation abounding it. Facing north at the road's junction with the A20 Ashford Road (see VP24), there are clear views over the intervening farmland to the HS1/Ashford-Folkestone railway and M20 corridor, with the escarpment of the North Downs above. As such, users of this road are considered to have the potential to experience significant effects arising from the proposed Development.

B2067 Aldington Road

12.3.294 The B2067 Aldington Road is the old Roman road which runs along the crest of the Hythe escarpment between Hythe and Ashford.

12.3.295 Views from it to the site are generally only possible from the short stretch between the western edge of Lymgne and the Lymgne Industrial Estate. As described in paragraphs 12.3.275 to 12.3.278, intervening landform, tree belts, settlement along the road and hedgerows restrict all other views.

12.3.296 Where the road passes the site a sporadically dense hedgerow exists to the north which restricts views into this closest parcel. Those views that are gained comprise the grassed expanse of the old airfield, the built-up and partially vegetated edges of Lymgne and the Lymgne industrial Estate, and a narrow slither of the North Downs escarpment 5.3km in the distance (see VP18). As such, users of this road are considered to have the potential to experience significant effects arising from the proposed Development.

Harringe Lane

12.3.297 Harringe Lane runs between Court-at-Street and Sellindge. It passes by the north-western boundary of the site between Harringe Court and the East Stour River.

12.3.298 As users of this narrow hedge-lined lane head northwards, glimpses over the surrounding landscape, including the western parts of the site (such as the settlement of Barrow Hill and the land between Harringe Brooks Wood and the Lymgne Industrial Estate), are possible where the hedge thins or where there are field entrances. In the background to these views is the escarpment of the North Downs.

12.3.299 At the point where the road passes directly alongside the site, and from just south of its crossing over the HS1/Ashford-Folkestone railway, there are occasional clear views in gaps between hedgerows of the most westerly part of the site, and glimpses of the Barrow Hill area. As such, users of this road are considered to have the potential to experience significant effects arising from the proposed Development.

A261 Hythe Road

12.3.300 The A261 Hythe Road approaches the site from the south-east and joins the A20 Ashford Road at Newingreen. From the approximately last 250m of this road, as it emerges from Kiln Wood and Folks Wood there are open views to the south-west across to the built-up area of Newingreen and that of Lymgne, and the open field of the old airfield above these. To the north between mature field-Oaks in the adjacent field to the road there are views across to the triangular parcel of land containing Hillhurst Farm, with the escarpment of the North Downs forming the horizon above this (see VP10). As such, users of this road are considered to have the potential to experience significant effects arising from the proposed Development.

Kennett Lane

12.3.301 As described in paragraphs 12.3.227 and 12.3.274, the site is apparent in views from the relatively open, and gently rising landscape between Stanford and Sellindge in which Kennett Lane, and then Hayton Road to the north of this, cut through (see

VP27). As such, users of this road are considered to have the potential to experience significant effects arising from the proposed Development.

Railway Line

- 12.3.302 The HS1/Ashford-Folkestone railway runs generally along the northern boundary of the site. Along its length through this area the route is either upon an embankment, and so elevated above the height of the adjacent land, or level with it. The exception is the stretch between Westenhanger Station and the north-eastern corner of the site where the route is set within a minor cutting.
- 12.3.303 Areas of the track which are elevated or are level with the site have occasional clear views into it where gaps in the lineside vegetation allow. Such views extend across the landscape either side of the East Stour River and up to the upper part of the greensand ridge dip slope. The areas that are more visually screened by lineside vegetation are around Westenhanger Castle and the settlement of Barrow Hill.
- 12.3.304 As most users of the railway past the site will be travelling at speeds at which it is not possible to clearly discern the detail of the landscape (particularly those using the HS1 line), and because the primary purpose of the clear majority of its users' is one of travel between two places disconnected with the site, it is considered that there are unlikely to be significant visual effects upon receptors of the route as a result of the proposed Development and, subsequently, they are scoped out of the assessment.

Places of employment

- 12.3.305 As noted in paragraph 12.3.255, the settlement of Newingreen contains an area of employment. The headquarters of Holiday Extras, and the offices of Oak Creative Advertising and Design are located to the immediate north of the A20 Ashford Road. Views between these and the site are restricted by the mature vegetation that surrounds the Holiday Extras site. As such it is considered that there are unlikely to be significant visual effects upon those receptors using this area as a result of the proposed Development.
- 12.3.306 The Lympne Industrial Estate, which borders the site on the Estate's northern, eastern and part of its western edges, is home to a number of employers. The Estate is bounded on the north and east by planted earth bunds. Whilst the rooflines of the buildings within the Estate remain visible from within the site, these bunds prevent lower level views out of the area. Along its western boundary with the site the Estate has a densely planted hedge and narrow tree belt, which also prevents view out at a lower level. As such it is considered that there are unlikely to be significant visual effects upon those receptors using this area as a result of the proposed Development and, subsequently, they are scoped out of the assessment.

Representative Viewpoints

- 12.3.307 After analysis of the overall visual amenity context of the site and its surrounds, and identification of those visual receptors upon which there is the potential for significant effects resulting from the proposed Development, a set of representative VP locations were determined. The list of the receptors and the representative photo-VPs used to assist in the impact assessment of the potential changes to their visual experience is set out in Table 12-20. The location of the photo-VPs is shown on Figure 12.11.
- 12.3.308 The precise location of each representative photo-VPs has been agreed with the F&HDC Landscape & Urban Design Officer, the ABC Planning Policy Officer, the AONB Unit (in relation to the North Downs Way National Trail), and with officers from NE during discussion and site visits.
- 12.3.309 Many of these VPs have been chosen to represent different types of visual receptor (e.g. users of a PRow and users of a public Highway, and users of Open Access

Land, or users of a recreation ground and those using an existing settlement). As far as reasonably possible the locations reflect the visual receptors at the distance and direction in which they are located and reflect the receptor type(s) that would be present at that location.

- 12.3.310 These have been included to reflect the locations which represent the range of views available to the receptor and which are typically representative of views that may have the potential to incur significant visual effects. In most cases, however, the location for the representative VPs has been chosen because it demonstrates the most visually open examples on which to base judgements of the scale of effects on visual receptors. Some of the VPs have been selected as they represent the location where the greatest effects would be anticipated; though some may be selected outside of that zone – either to demonstrate the reduction of effects with distance; or to specifically ensure the representation of a particularly sensitive receptor.
- 12.3.311 Para 6.31 of GLVIA3 confirms, however that it is not the viewpoint themselves that the assessment is upon but the receptor (i.e. the people) at that viewpoint:
- 12.3.312 “Each visual receptor, meaning the particular person or group of people likely to be affected at a specific viewpoint, should be assessed in terms of both their susceptibility to change in views and visual amenity and also the value attached to particular views.”
- 12.3.313 The purpose of viewpoints, as indicated in Para 6.19 of GLVIA3 is for illustration of the visual effects.
- 12.3.314 In addition, the answer to question 44 of the LI’s ‘Technical Information Note 01/21-GLVIA webinar Q&As’ (Ref 12.41) affirms that the “*focus of the visual assessment should be the visual receptors, not viewpoints*”.

Table 12-20 Visual Receptors & their Photo-VP Numbers that are Representative of them

Visual Receptor	Representative Photo-VP number ID (Figure 12.11)
Users of PRow through the site	15, 16, 17, 19, 20, 21, 22, 23
Users of localised/close range PRow, within 2km to the south of site	29
Users of localised/close range PRow, within 2km to the west of the site	11, 14
Users of localised/close range PRow, within 2km to the north of the site	25, 27
Users of localised/close range PRow, within 2km to the east of the site	8, 9, 10
Users of intermediate/medium range PRow, between 2-5km to the west of the site	12, 13
Users of intermediate/medium range PRow, between 2-5km to the north of the site	3, 4, 5, 6, 26
Users of the North Downs Way, National Trail	1, 2, 3, 4, 5, 6, 7, 28
Users of the Saxon Shore Way, Long Distance Path	12, 29
Users of Open Access Land upon the North Downs scarp slopes within medium range	5
Users of Open Access Land (including Peene Country Park) upon the North Downs scarp slopes within long range	1, 2
Users of Lympne Airfield	18
Users of Westenhanger Castle	9
Users of Port Lympne Animal Park	17

Visual Receptor	Representative Photo-VP number ID (Figure 12.11)
Users and residents of Lympe	18
Users and residents of Westenhanger	20
Users and residents of Newingreen	19, 10
Users and residents of Barrow Hill	16
Users and residents of Stanford	27
Users and residents of Court-at-Street	11
Users and residents of Aldington Church	13
Users and residents of Brabourne	26
Users and residents of Sellindge	25
Individual Residential Properties: inside the application boundary, and which would be demolished by the end of the construction period (i.e.: Elms Acres, The Willows, The Bungalow, Somerfield Court Farm, Rose Cottage, Killymoon, and The White House).	-
Individual Residential Properties along the A20 to be retained (or whose demolition cannot be decided until the further tiered planning stages) and are generally enclosed by the proposed Development (i.e.: Benham Water Farm; Whiteways, Boleh, Red House Farm, Cydonia, Cobtree Cottage, 2 Franks Villas, Quorum (Ivy Cottage), Craylands, Elms Farm and Honeypot)	-
Individual Residential Properties along or near to Stone Street, Westenhanger to be retained (or whose demolition cannot be decided until the further tiered planning stages) and which are generally enclosed by the proposed Development (i.e.: Twin Chimneys and Little Greys, Tollgate Cottage, and Hillhurst Farmhouse)	-
Individual Residential Properties to be retained (or whose demolition cannot be decided until the further tiered planning stages) and which are only partially enclosed by the proposed Development (i.e.: Farm Cottage, Otterpool Manor, Upper Otterpool, Barrow Hill Farm, 1-2 Barrow Hill Farm Cottages),	-
Users of Junction 11 of the M20 and the adjacent Service Station	8
Users of roads through the site including the A20, Stone Street and Otterpool Lane	17, 24
Users of roads within 0-2km of the site including Hythe Road, Stone Street, Aldington Road, Harringe Lane, Kennet Lane	8, 11, 14, 29,18

Landscape Related Designations

Designations Scoped In

12.3.315 In addition to the effects upon landscape character and visual receptors, the impact upon the following landscape-relevant designations has been considered within section 0 of this assessment.

Kent Downs AONB

12.3.316 Given the scale of the proposed Development and proximity to the AONB, this assessment has included a consideration of both the direct and indirect impacts of the proposed Development on the ‘special characteristics and qualities’ of the designation and its setting, the purpose of its designation i.e. the conservation and enhancement of natural beauty as well as the policies of the AONB Management Plan and in the development plans of F&HDC and ABC.

Special Landscape Area – North Downs

12.3.317 Given that the site incorporates part of the SLA designation and that it lies in close proximity to other parts this assessment has included consideration of both the direct and indirect impacts upon these. The consideration is limited to those SLAs within F&HDC's administrative area as the ABC-LC SPD, at page 14, states that the designation has "*been removed from the Statutory Development Plan and carries little weight in planning terms*" and that the ABC-LC SPD "*will provide a greater clarity and depth of detail in relation to the countryside and the key characteristics and features that lie within it.*"

Open Access Land

12.3.318 The effects upon users of Open Access Land are included within the visual assessment.

Country Parks

12.3.319 The effects upon users of Peene Quarry Country Park are included within the visual assessment, but the users of Brockhill Country Park have been scoped out due to the lack of inter-visibility between here and the site.

Designations Scoped Out

Dark Skies Protection Area

12.3.320 The proposed Dark Skies protection area around Woodchurch in the ABC administrative area has been scoped out of the assessment on account of:

- the proposed Development not being located within the area indicated by ABC-LP Policy ENV4 that would be designated as a 'dark sky zone'
- the substantial intervening woodland blocks that existing between the site and Woodchurch - the area identified as the central focus of the proposed designation.

Conservation Areas

12.3.321 Whilst the presence of a CA contributes to the sensitivity of Landscape Receptors within this assessment, direct and indirect effects upon these designated areas has been assessed within Chapter 9: Cultural Heritage, and so has been scoped out of this assessment.

Registered Parks and Gardens of Historic Interest

12.3.322 Whilst the presence of RPGHI contributes to the sensitivity of Landscape Receptors within this assessment, direct and indirect effects upon these designated areas has been assessed within Chapter 9: Cultural Heritage, and so has been scoped out of this assessment.

Future Baseline

12.3.323 The future baseline is the situation that would prevail should a proposed Development not proceed. The future baseline is further defined by the assessment scenario that the topic adheres to. The future baseline for landscape and visual impact has identified the following.

12.3.324 The proposed Development is expected to be constructed by 2042. Base case environmental conditions over this relatively long period would be expected to vary from the present-day baseline described.

12.3.325 This section describes:

- other developments (over 50 dwellings and/or over 25,000m² commercial land use area / or equivalent), whether under construction, in-planning or allocated in local authority development plans, within the study area (see Figure 12.1) that, in combination with, or in addition to, the proposed Development may have a significant effect on landscape and/or visual amenity receptors; and
- key potential environmental changes that may occur during this period have a likelihood to alter the future baseline scenarios of this assessment over this period regardless of the proposed Development.

Other Developments

12.3.326 Table 12-21, Table 12-22 and Table 12-23 provide a description of the applicable developments (taken from the complete list in ES Appendix 2.5) within the study area whose inclusion within the LVIA cumulative assessment has been considered. The location of these is shown on Figure 12.76.

12.3.327 It is not anticipated that there would be any cumulative landscape character and visual amenity effects with the other schemes identified in ES Appendix 2.5 (including those within and around the built up areas of Folkestone and Hythe) as they are located outside of the ZTV shown on Figure 12.10.

Potential Cumulative Developments within and surrounding the site

12.3.328 Table 12-21 provides a description and details of the other applicable developments within and immediately adjacent to the site that have been included for consideration with the cumulative assessment.

Table 12-21 Other applicable developments within or adjacent to the site

Code & Development Title	Nature and location of the Development	Planning / construction status	Inclusion with cumulative assessment
AK: Link Park Industrial Estate extension	52,000m ² commercial development	Outline planning permission granted (ref: F&HDC: Y15/0880/SH) Construction has not yet commenced	No. The proposed Development would displace this current permission, so it has not been included in the cumulative assessment
AJ: Land Adjoining Enterprise Way Enterprise Way Link Park Lympne	30,668m ² of commercial development	Planning Permission granted September 2017	No. The proposed Development would displace this current permission, so it has not been included in the cumulative assessment
Lympne Airfield	125 dwellings upon the land between the existing Lympne Industrial Estate and Lympne village,	Allocated in policy ND6 of the F&HDC-P&PLP	No. The proposed Development would displace this current permission, so it has not been included in the cumulative assessment
C3: Otterpool Quarry Waste and Anaerobic Digestion Facility	12.5m high waste transfer station, and 7.9m high anaerobic digestion plant, a 10m high silo, and a 6.5m high office building	Permission granted (by KCC) March 2011 (SH/08/124) Permission considered by KCC as 'implemented' (albeit minor works)	No. Being cognisant of the details of the permitted waste facility scheme at Otterpool Quarry, and given that this potential cumulative scheme proposes retention of the existing vegetation on its boundaries (and additional tree planting within its site), and that the proposed Development would surround this

Code & Development Title	Nature and location of the Development	Planning / construction status	Inclusion with cumulative assessment
	across the 2.5ha. Otterpool Quarry site.	only) but not completed.	<p>potential cumulative scheme closely to the north and west with built form that is taller than that of the potential cumulative scheme itself, any potential significant cumulative effect would be consumed into the overall effects of the proposed Development itself.</p> <p>It is also considered that the scenario whereby its full build out occurs would not bring about any greater significance of effect on landscape character and visual amenity than the proposed Development itself. Consequently, the effects of the permitted waste facility are not assessed, and the scenario whereby it occurs instead of the 800no. dwellings and 1no. primary school that its existence would displace from the proposed Development, does not feature in this assessment.</p>
<p>The Otterpool Framework Masterplan Area (OFMA)</p>	<p>1500 dwellings, 1no. primary school.</p> <p>Located immediately south west of the proposed Development upon the current site of the Lympne Industrial Estate, and upon the land of the Port Lympne Animal Park car park and north and east from here to the OPA site boundary and Otterpool Lane respectively</p>	<p>An illustrative layout of one way this development could be delivered is set out on drawing <i>OPM(P)3016_N</i> that is submitted in support of the OPA.</p> <p>Construction would not commence before the substantial part of the proposed Development had been built, and completion is anticipated by 2044.</p>	<p>Yes.</p> <p>The OFMA area is comparatively flat, despite its position on the greensand ridge. It is also benefits from being relatively visually contained by vegetation to the south, east, and west. As the scheme would be constructed after the proposed Development, the OPA buildings and surrounding mitigation planting is likely to screen views to the OFMA scheme from: within the OPA site, the north as well and bolster the visual containment on the east.</p>

12.3.329 The only development that has the potential to give rise to significant cumulative effects within and immediately surround the site is the OFMA scheme. Taking into account, however:

- the distances and degrees of visibility between the OFMA scheme and the landscape and visual receptors;
- the size and nature of the proposed Development in relation to this scheme;
- the likely timing of the OFMA construction in relation to the proposed Development;
- the degree of built and vegetated enclosure associated with the proposed Development that there would be in place by the time of the OFMA construction, as well as the likely structural vegetation planting there would need to be around the edges of the OFMA site (as illustratively indicated upon drawing *OPM(P)3016_N*);

12.3.330 There is the potential for significant cumulative effects with only the following receptors:

- landscape character receptors: SDC-11 (those areas of it that are outside of the OPA), ABC-25 and AONB-01.

- visual receptors: users of PRoW HE316 to the west of the site.

12.3.331 Users of PRoW HE317 & HE318 to the south of site (also part of the Saxon Shore Way, Long Distance Path) would only experience glimpses of the OFMA development for a very short sections of their routes (at the very northern ends (see VP 29). By the time of the OFMA’s construction the advance planting associated with the proposed Development would be establishing, so sight of this is with the OFMA scheme is not anticipated.

12.3.332 Whilst the combined effects arising from this scheme in addition to the proposed Development upon some of the other receptors is, in general, likely to be adverse, these are not considered to intensify the effects to the point that they are potentially significant.

Potential Cumulative Developments around Sellindge

12.3.333 Table 12-22 provides a description and details of other applicable developments within and around Sellindge that have been included for consideration with the cumulative assessment.

Table 12-22 Other applicable developments within and around Sellindge

Code & Development Title	Nature and location of the Development / Distance from the site	Planning / construction status	Inclusion with cumulative assessment
H: Land Adjacent to the Surgery, Main Road Sellindge (south of the A20)	Up to 250 dwellings, a local mixed-use centre including new parish council offices, and associated commercial floorspace. 100m from the site	Hybrid planning permission granted January 2016 (Y14/0873/SH). 1 st phase (50 houses under construction). Reserved matter application for 2 nd and final phases is in-planning. Completion anticipated by 2025.	Yes
AM: Land rear of Rhodes House, Main Road, Sellindge (north of the A20)	Up to 162 dwellings, up to 929 square metres Class B1 business floorspace, allotments, recreational ground, multi-use games area. 250m from the site.	Outline planning permission granted in September 2017 Construction not yet commenced. Completion anticipated that the entire scheme would be completed by 2027.	Yes
AQ: Sellindge Strategy	Circa 350 further houses in addition to those already approved in Sellindge – above. 100m from the site.	Allocated in policy CSD9 of CSR The allocation insists upon a substantial landscape/planted buffer to the north and east of the development. Appendix 3 Table 6.1 of F&HDC-CSR indicates that the Sellindge Strategy would be complete by 2034.	Yes

12.3.334 Taking into account: the distance and degree of visibility between these cumulative developments and the landscape and visual receptors; the considerably larger size and nature of the proposed Development in relation to these cumulative schemes; the degree of existing built and vegetated enclosure there already is around these cumulative development sites (including to the east where there is very little intervisibility with the open land around Stanford) and the additional planned landscape planting around them as indicated in approved drawings / policy diagram

(CSR Figure 5.7), there is the potential for significant cumulative effects with only the following receptors:

- landscape character receptors: SDC-05, 07, 09 and 11; and ABC-AONB-01
- visual receptors: users of localised/close range PRow, within 2km to the west of the site, users of localised/close range PRow, within 2km to the north of the site, users of intermediate/medium range PRow, between 2-5km to the north of the site, users of the North Downs Way, National Trail, users of Open Access Land upon the North Downs scarp slopes within medium range, users and residents of Sellindge.

12.3.335 Whilst the combined effects of the proposed Development with those arising from these schemes upon some of the other receptors is, in general, likely to be adverse, these are not considered to intensify the effects to the point that they are significant.

12.3.336 For the purpose of this LVIA it is assumed that the three cumulative schemes around Sellindge are considered as one, and that all construction would be completed by 2034.

Potential Cumulative Developments around Ashford

12.3.337 Table 12-23 provides a description of developments within and around Ashford that have been included for consideration with the cumulative assessment. Other allocated sites within the ABC-LP (which are over 50 dwellings, and/or 25,000m² of business use) are not considered to give rise to potential significant landscape character and visual amenity cumulative effects. This is because they are either outside of the study area, located within already substantially built-up areas or located suitably away from landscape character and visual receptors.

Table 12-23 Cumulative developments around Ashford

Development Title	Nature and location of the Development / Distance from the site	Planning / construction status	Inclusion with cumulative assessment
PP14: Land on The North Side of Highfield Lane, Sevington	Commercial buildings and structures of up to 157,600m ² . 6.0km from the site	Planning permission granted September 2017 (14/00906/AS). Completion anticipated by 2025.	Yes
PP15, PP22, B10, B13 & B17: Cheesemans Green	Up to 1100 dwelling 6.5km from the site	Outline planning permission granted January 2006 (02/00278/AS, as amended by 11/00473/AS) Detailed permission granted on certain parcels and are under construction. Completion anticipated by 2030	Yes
S14: Park Farm, south east	Up to 325 dwellings 7.4km from the site	Planning permission granted (18/00652/AS) Completion anticipated by 2023	Yes
S16: Waterbrook	400 dwellings 6.5km from the site	Planning permission granted (18/00098/AS) Completion anticipated by 2030	Yes
S17: Willesborough Lees	220 dwellings 6.8km from the site	Planning permission granted (16/01722/AS and 19/00702/AS) Completion anticipated by 2023	Yes
U22 / PP5: Conningbrook	300 dwellings 8.6km from the site	Planning permission granted (12/01245/AS)	Yes

Development Title	Nature and location of the Development / Distance from the site	Planning / construction status	Inclusion with cumulative assessment
		Completion anticipated by 2023	
S15: Finberry North West	300 dwellings & 8500m ² commercial development 7.3km from the site	Allocated in ABC-LP Completion anticipated by 2028	Yes
S19: Conningbrook Phase 2	170 dwellings 8.7km from the site	Allocated in ABC-LP Completion anticipated by 2026	Yes
S45: Land South of Brockman's Lane, Bridgefield	100 dwellings 7.5km from the site	Allocated in ABC-LP Completion anticipated by 2024	Yes
S2: Land North-East of Willesborough Road, Kennington	700 dwellings 8.75km from the site	Allocated in ABC-LP Completion anticipated by 2030	Yes

12.3.338 Taking into account:

- the location of these schemes at the far western edge of the study area;
- the topography of their surrounding landscape being relatively flat and low lying;
- the adjacent backdrop of the Ashford's conurbation;
- the degree of existing vegetated enclosure there already is around them (and that planned as part of their construction); and
- and the lack of intervisibility between these schemes and the proposed Development,

12.3.339 There is the potential for significant cumulative effects with only the following receptors:

- landscape character receptors: SDC-05, ABC-30 ABC-AONB-01, ABC-AONB-02 and ABC-AONB-06.
- visual receptors: users of the North Downs Way, National Trail, users of Open Access Land upon the North Downs scarp slopes within medium range.

12.3.340 Whilst the combined effects of the proposed Development with those arising from these schemes upon some of the other receptors is, in general, likely to be adverse, these are not considered to intensify the effects to the point that they would be significant.

12.3.341 For the purpose of this LVIA it is assumed that the ten cumulative schemes around Ashford are considered as one, and that all construction would be completed by 2030.

Key Environmental Changes

Ash dieback

12.3.342 The impact of *Ash Dieback* is having an increasing effect on the tree cover within existing woodlands, tree belts and hedgerows in the UK. As this has a subsequent effect upon their visual screening properties it is an environmental change which has informed the future baseline.

- 12.3.343 Eastern counties, such as Kent, who were one of the first to identify the disease in their woodland, are considered by the Joint Nature Conservation Committee (JNCC) to be sufficiently affected to declare this an *Important Ash Area*.
- 12.3.344 The AONB-Unit, in response to this, and to their identification that the ash tree is the most common tree species in the AONB, have partnered with organisations such as KCC, the Woodland Trust and the Forestry Commission to form the *Ash Project*, in order to disseminate information about the disease locally and record this major change to the landscape.
- 12.3.345 The website that supports this project (Ref 12.42) states that the disease, caused by the fungal pathogen *Hymenoscyphus fraxineus*, and also known as Chalara dieback of ash is characterised by leaf loss and crown dieback in infected trees and is currently untreatable.
- 12.3.346 The Ash Project cites Forestry Commission research which states that 9% of all of the woodland in South East England is made up of ash and that 90-98% of these are likely to be affected over the next decade.
- 12.3.347 The F&HDC P&PLP at paragraph 14.14, reaffirms the effect this could have this:
“Both in the woodlands and hedgerows ash forms a prominent and important part of the landscape. Kent Downs woodlands were one of the first areas in Britain to experience widespread infection from Ash Dieback and the landscape implications are thought to be serious with the expected death and weakening of the ash population.”
- 12.3.348 In response the Ash Project, in their article about potential re-planting versus natural regeneration, considers that where:
“less than 10% of the canopy of a woodland is made up of ash that the existing trees will just expand to fill in the gap left by ash trees when they die. As the number of trees lost increases the gaps in the canopy will become large enough for new trees [the fast growing [Sycamore is considered to be initially the most likely] to take the place of ash. In South East England over 30% of woods have more than 20% ash in their canopies so this natural regeneration will make up for the loss of ash trees.”
- 12.3.349 With regards to areas where replanting is necessary, a JNCC report on ‘*The Potential Ecological Impact of Ash Dieback*’ (Ref 12.43) recommended a palette of eleven tree species whose planting in place of Ash could support approximately three quarters of the other flora and fauna species currently supported by ash. The species are field maple, birch, hawthorn, aspen, oak, small leaved lime, sycamore, hazel, beech, cherry and goat willow. These would be taken forward into the planting palette of the proposed Development.

Climate Change

- 12.3.350 The Forestry Commission Research Note no. 201 (Ref 12.44) identifies that the strains of tree species currently found in the UK are unlikely to be able to adapt sufficiently to the projected increases in temperature, changes in the seasonality of rainfall, and an increased frequency of extreme events that are associated with global climate change.
- 12.3.351 To address this the Research Note advocates that all future tree planting includes within its plant stock for particular tree species a proportion that are grown from seed collected from areas of Europe 2° to 5° further south than the site so that the overall plant community created in such plantings is more resilient to warmer weather that may occur in the coming decades.
- 12.3.352 Subsequently, the GI-Strategy has adopted this approach within the structural planting proposals.

12.4 Design and Mitigation

12.4.1 The following section sets out:

- The embedded design measures, including good practice approaches, relied on in this assessment; and
- The potential significant effects remaining after the application of embedded design measures and good practice approaches, along with any possible additional mitigation that may assist in addressing or reducing these potential significant effects.

12.4.2 The potential significant effects prior to additional mitigation are identified in the Assessment Summary tables (Table 12-26 and Table 12-27).

12.4.3 Landscape character and visual amenity-related considerations have influenced the proposed Development throughout the design development process. An iterative process has facilitated design updates and improvements, informed by preliminary landscape character and visual amenity analysis.

12.4.4 Landscape character and visual amenity impacts would be reduced by measures embedded into the design of the proposed Development, as well as by additional mitigation, and together these measures would act to avoid, reduce and/or mitigate effects. The measures have been summarised by whether they are embedded design measures, which for example are secured through the documents for approval, or additional mitigation secured, for example, by planning condition or legal agreement.

12.4.5 Embedded design measures are described as measures that form part of the design and which have been developed through the iterative design process. They also include 'good practice' standard approaches and actions commonly used on development projects to avoid or reduce environmental impacts.

12.4.6 Additional mitigation is described as any additional Development-specific measures that cannot be developed at this time, but which are needed to avoid, reduce or offset potential residual significant effects.

Embedded Design Measures

Construction

12.4.7 The LVIA considers the impacts on landscape character and visual amenity resulting from construction of the proposed Development. This takes into account the assumed types of construction activities involved, the geographic scale, extent and duration of activities and their proximity to receptors. When assigning magnitude to the impacts identified, in accordance with Table 12-10 and Table 12-13 the following site-wide embedded design and mitigation measures have been assumed to be in place.

Outline Code of Construction Practice

12.4.8 To avoid or prevent significant adverse effects occurring, or to reduce their significance upon landscape character and visual amenity receptors during the construction period an Outline Code of Construction Practice (CoCP) has been prepared to accompany the OPA (see ES Appendix 4.17), which would be secured by way of a planning condition. This outlines the best practice construction methodologies and describes procedures for the management of environmental impacts during construction which are relevant to this assessment, including:

- appropriate designs of construction fencing and hoarding surrounding construction areas;

- measures to limit construction site lighting to that required for the activity, its extent and its duration only (meeting health and safety requirements), including horizontal cut-off optics and zero floodlight tilt angles to prevent light spill, and avoiding the location and direction of lighting near to and towards existing residential properties where possible so that they adhere to the lighting strategy prepared at Tier 2 and the GNROL with regards to light levels, light spill, glare and skyglow;
- avoidance of earth/spoil stockpiles over 6m in height;
- location of site compounds, material stockpiles, construction related parking and other visually obtrusive activities away from sensitive receptors such as existing residential properties and users of PRow, cycle paths and National Trails both inside and outside of the application site boundary;
- all retained woodland, trees, tree belts and hedgerow vegetation will be protected during construction in accordance with BS:5837(2012) (as outlined in the OP-PS); and
- Implementation, management and maintenance of the advance structural planting proposals as outlined on parameter plan *OPM(P)4002_YY – ‘Open Space and Vegetation’*, within section 5.5 and 6.4-6.5 of the GI-Strategy and Figure 12.77 of this LVIA (as the planting would also provide a mitigation-related function during the operational phase the details of this are set out in full in the ‘operation’ part of this section of this chapter).

Construction plant

12.4.9 The likely construction plant used during the implementation of the scheme is set out in the CoCP. It is assumed, given the proposed height of the buildings and their predominantly residential form, that mobile cranes, as opposed to static tower cranes will be predominantly used.

Operation

12.4.10 The LVIA considers the impacts on landscape character and visual amenity resulting from operation of the proposed Development. This takes into account the types of impacts that are likely to occur, the scale, extent and duration of these, and their proximity to receptors. When assigning magnitude to the impacts identified, in accordance with Table 12-10 and Table 12-13, both site-wide and area-specific embedded design measures have been assumed to be in place.

12.4.11 These take into consideration the contents of the planning submission documents and plans set out in section 12.2 of this LVIA and the planning status they have, insofar that the LVIA is primarily reliant upon the planned elements of the proposed Development and the design principles committed to, as described within the OP-DS, the Parameter Plans and the SDP (including those elements and design principles of the supporting documents that the SDP states that the future designs for the proposed Development that are prepared during the further tier planning stages should accord to).

12.4.12 The LVIA has also been reliant upon by the mitigation-related commitments that have been made within the supporting documents i.e. the GI-Strategy and the Governance and Stewardship Strategy.

- 12.4.13 In addition, the LVIA has been informed by (but not reliant upon) aspects of the other supporting documents and plans – as demonstrations of ways the proposed Development could be achieved. These are the Illustrative plans (ES Appendix 4.5), the Indicative Phasing Plan (ES Appendix 4.6), the CKVS (ES Appendix 12.5), the DAS (ES Appendix 4.16), and the non-commitment aspects of the GI-Strategy and the Heritage Strategy.
- 12.4.14 The LVIA has been cognisant of the planning status these supporting documents and plans have and the limitations in the level of detail they provide, such that the ‘worst-case’ scenario is used in all cases where assumptions need to be made.

Site-Wide Embedded Design

- 12.4.15 Details of the site-wide embedded design measures, that were developed through the landscape-led iterative design process, which would act to avoid or prevent significant adverse effects occurring, or would act to reduce the significance of the effect upon landscape character and visual amenity receptors as a result of the completed proposed Development in operation, are set out below and grouped under the following headings:
- overall approach
 - existing structural vegetation
 - landform
 - built development land use & layout
 - built development legibility
 - built development density
 - built development height
 - built development character
 - lighting & reflectivity
 - green infrastructure
 - blue infrastructure
 - structural planting
 - movement & access
 - long term management
- 12.4.16 The title of the individual embedded measures associated with each of these headings forms a sub-section under these. The titles are used in the ‘embedded design measures’ column of the Assessment Summary tables (Section 12.7).

Overall Approach

Landscape-led approach

- 12.4.17 A primary embedded design measure, as highlighted by the SDP, is that the proposed Development is, and future design codes, masterplans and reserved matter applications would be landscape-led i.e. planned primarily around an understanding of the place.
- 12.4.18 An example of this is how the site-specific landscape character assessment (ES Appendix 12.1) has sought to understand the natural and human forces that have shaped the area, the areas visual context and perceptual qualities, its value, distinctiveness, condition and sensitivities, and use them to guide the planning of the proposed settlement.

- 12.4.19 This has helped protect sensitive characteristics, refine the proposed Development's extents, identify areas with greater capacity for change, and most importantly establish the key open spaces from which the settlement's character areas would be planned around.
- 12.4.20 As outlined in the SDP (section 2.4), this ensures that the seven phases / character areas of the proposed Development would "*respond to the landscape and provide new features to create distinctive areas which deliver character borne from its place.*"
- 12.4.21 The existence of the SDP also ensures that the detailed masterplans and Design Codes for each individual phase of the proposed Development that would come forward during Tiers 2 and 3 apply a consistent design approach to the entire settlement.

Existing Structural Vegetation

Retention and protection of existing structural vegetation

- 12.4.22 To assist in reducing adverse effects upon the landscape character of the site (in particular to help conserve the landscape structure and the intrinsic character of the place) and its surrounds and the visual amenity of receptors identified, the majority of existing trees, hedgerows within the site would be retained where feasible (see Parameter Plan *OPM(P)4002 – Open Space & Vegetation*), used to guide the placement of development parcels and, where possible, integrated into the proposed Development.
- 12.4.23 Those that are not shown for retention have been assessed through Phase 1 habitat surveys, site walk overs and a high-level Tree Constraints Plan (TCP) (in ES Appendix 7.4, Figure 2) carried out in preparation for the OPA.
- 12.4.24 To mitigate the harm caused by this potential vegetation loss, and where the creation of movement corridors passing through existing field boundaries may threaten more vegetation removal the OP-DS and the SDP confirm that there would be a presumption towards vegetation retention.
- 12.4.25 SDP site-wide principle 2) states that the design of the proposed Development must "prioritise and integrate resilient landscape and open space features including: ... existing and new structural vegetation based on the pattern and form of the current landscape."
- 12.4.26 Section 5.1 of the SDP affirms that the purpose for retention would be "to help conserve the landscape structure and the intrinsic character of the place as well as providing instant maturity to neighbourhoods."
- 12.4.27 The SDP and the OP-DS state that detailed structural vegetation quality and condition surveys (including to BS:5837(2012)) would be carried out during the further proposed planning stages (Tier 2 and Tier 3).
- 12.4.28 These would identify the quality and precise location of existing structural vegetation, the extent of the area required to protect their canopies and root zones, and their condition and quality. This will allow informed decisions regarding the positioning of potential access routes (primarily focusing upon gaps away from the vegetations' protection zones, and secondarily where there is vegetation of lesser quality and condition) to be made.
- 12.4.29 SDP site-wide principle 10) states that the relationship between the A20 Ashford Road and the proposed Development would, for example be, in part, shaped the "*retention of existing structural vegetation along it, where possible*" and a "*coherent tree planting and landscape strategy*".

Bolstering of existing structural vegetation

12.4.30 To further reduce the significance of the effect upon the identified landscape character receptors the strategic structural planting proposals (set out section 6.5 of the GI-Strategy and Table 12-25 of this LVIA, and shown on Figure 12.77) have, in part, been planned to provide a bolstering and gapping-up of the existing structural vegetative belts across the site – and so help restore and reinforce this element of the site’s intrinsic landscape character.

Landform

No Substantial Landform Change

12.4.31 The documents and plans for approval do not propose major changes to the existing landform. The natural undulating topography of the site would be a key driver in the development of a settlement layout which integrates with the local landscape character.

12.4.32 There would, however, be cuttings and embankments created with the part re-alignment and upgrading of the A20 between junction 11 of the M20 and Newingreen. In addition, there would be some minor land raising to create the approaches and abutments to the six road bridges shown on Parameter plan *OPM(P)4001 – Development Areas and Movement Corridors*. The measures to reduce the landscape character and visual amenity effects of these are set out in Table 12-25.

12.4.33 Where excavations are required for the accommodation of surface and storm water assets, such as swales, storm water basins and ponds, or landforms for the planting of structural vegetation, these would be designed in accordance with the landscape design principles of the GI-Strategy so that they are appropriately integrated into the landscape of the completed proposed Development. These set out that the sides of many of the planned swales would be vegetated with trees (as part of the structural planting and habitat creation proposals) and that storm water basins would take the character of ponds with naturalised edges to them.

A Topography-responsive Design

12.4.34 To further assist in reducing adverse effects upon the landscape character of the site and its surrounds and the visual amenity of receptors identified the design of the proposed Development would be shaped by the existing topography of the landscape – rather than forcing its own form upon it.

12.4.35 This mitigation measure is highlighted in SDP design principle 4): where the placement of built-form ‘land-marks’ and ‘gateways’ would be respond to topography, and in SDP 6) where the streetscape pattern “*should relate to the... topography of the area.*”

Built Development Land Use & Layout

12.4.36 In terms of ‘Layout’, the way in which the potential buildings and routes within the proposed Development, and the open spaces between them, are situated and orientated in relation to each other is a reserved within the OPA.

12.4.37 As set out on the parameter plans, however, the OPA seeks approval of the considered location and extent of the strategic open spaces, the location and maximum extent of the proposed Development areas between these, and the indicative layout of key routes. The embedded design measures that are in place to mitigate the effect of these upon the identified landscape character and visual amenity receptors are set out below.

A Landscape-responsive Layout

- 12.4.38 The general layout of the proposed Development is a key response to the site-specific landscape character assessment (ES Appendix 12.1), insofar that it identified the lower lying land at the head of the East Stour River, the previously developed and built-up land around the old racecourse, and the potential for an improved setting to Westenhanger Castle as an identity-building and visual focus for the town – which has led to the placing of the settlement's town centre between the A20 and Westenhanger Station.
- 12.4.39 In addition the landscape character value of the sinuous route of the East Stour River, the landform of Barrow Hill, and the greater visible prominence of the upper parts of the greensand ridge that were also identified in the site-specific landscape character assessment also helped inform the proposed location of local centres, the creation of distinct scheme character areas, and the outward transition to lower densities and lower building heights.
- 12.4.40 In response to this, and to directly assist in reducing adverse effects upon the landscape character of the site and its surrounds the SDP sets out a number of design measures that have shaped the proposed Development thus far, and others which must be adhered to the further Tier 2 and Tier 3 planning stages.
- 12.4.41 First is the fact that it is the key strategic parks; Castle Park, the Country Park and East Stour Riverside Park, have driven the broad layout of the settlement as a whole. Secondly, it is the “*existing pattern of the wider landscape, with woodlands, tree belts (shaws) and hedgerows*” (Section 5.1 of the SDP) as well as other existing field boundaries (and other valued existing features such the runways of the old Lympe Airfield) that must shape the emerging arrangement of proposed Development areas. In areas where such an intimate division of the landscape does not already exist new planted breaks between proposed Development areas have been proposed - as indicated upon Parameter Plan *OPM(P)4002 – Open Space & Vegetation* and as outlined in section 6.5 of the GI-Strategy (supported by Figure 12.77 of this LVIA). The CKVS reinforces these principles - recommending that the existing field-scape pattern of the landscape is used “*as guide for development blocks, large buildings, open spaces and infrastructure*”.
- 12.4.42 Figure 3.8 and the figures in Section 4 of the SDP show that the proposed layout also incorporates space for the continued appreciation of some of the long-range views to the North Downs escarpment from within the site and its immediate surrounds.

Robust Defensible Edges

- 12.4.43 In addition to the creation of structural planting units between the proposed Development areas, the planning of robust planted ‘defensible edges’ and ‘strategic buffers’ along some of the boundaries of the settlement to check sprawl, and to conserve the individual identity of existing neighbouring settlements and the rural character surrounding them has been proposed – see Parameter Plan *OPM(P)4002 – Open Space & Vegetation* and section 6.5 of the GI-Strategy (supported by Figure 12.77 of this LVIA). These also would further assist in reducing adverse effects upon the landscape character surrounding the site and the visual amenity of receptors with views towards it.

Sensitive Land Use Siting

- 12.4.44 The location of particular key proposed land uses are placed within the settlement influences the potential impacts upon the landscape character and visual amenity receptors identified.
- 12.4.45 As indicated on Figure 3.8 of the SDP, the proposed ‘business development park’ has, for example, therefore been purposely planned away from existing residential

receptors, and instead is located closer to areas of existing commercial and non-residential activity – i.e. Junction 11 of the M20, the motorway services, motorway maintenance depot, and the railway station.

Sensitive Layout Detail

- 12.4.46 In order to assist in reducing adverse effects upon the visual amenity of existing residential receptors within, and around the edges of the site Principle 19 of the SDP states that *“the separation distances between existing residential properties and new development, including consideration of the gap between the habitable rooms of existing and new dwellings (particularly where such dwellings differ in their number of storeys or in their finished floor levels) would be subject to detailed design at planning Tiers 2 and 3 to avoid unacceptable overbearing and dominating effects upon occupiers.”*

Settlement Legibility

Clear Settlement Legibility

- 12.4.47 It is critical to its successful integration within its landscape character context that the proposed Development is viewed and understood as a town with a clear centre and satellite local centres, rather than as an extended built up area or ‘sprawl’.
- 12.4.48 To assist in the reduction of adverse effects upon the landscape character receptors surrounding the site, and upon the identified visual amenity receptors with views towards it – (particularly those upon the escarpment of the North Downs), therefore, the design and planning of the proposed Development thus far has included measures that contribute to its successful visual legibility as a town.
- 12.4.49 Section 5.1 of the SDP requires that the design codes and detailed masterplans produced at the Tier 2 and Tier 3 planning stages must *“use a variety in building heights to help create a hierarchy between different areas of the settlement such as the town centre, local centres and the areas surrounding them; and distinction between the different places of character across the settlement.”* At a broad-scale this is shown by the *OPM(P)4003 _YY – Heights* parameter plan.
- 12.4.50 In addition, the SDP states that the design codes and detailed masterplans produced at the Tier 2 and Tier 3 planning stages must use building density *“to help create a visually legible hierarchy, gradation and distinction between the different places and neighbourhoods across the Scheme, with highest densities in the town centre and local centres.”*
- 12.4.51 Figure 3.8 of the SDP graphically demonstrates this, and includes the explanation that: *“Taller buildings are clustered nearby the Town Centre, reflecting the character of traditional towns, however heights step down towards the station and vary across development to take account of heritage and views to/ from the Kent Downs AONB.”* SDP Figure 3.8 also highlights the location of the three local centres – and the corresponding plans through section 4.0 show how their legibility would be reinforced by the inclusion of larger, taller, more visually distinct buildings (such as shops, community buildings, health facilities, and schools) and public open spaces in these areas.
- 12.4.52 Section 5.2 of the SDP also requires the settlement to include *“town-wide landmarks that are of significance to Otterpool Park’s character and identity as a whole - e.g. ... key town centre buildings...”*.
- 12.4.53 These considerations are shown on the Illustrative Masterplan, as one way that this can be achieved.

Deliberate Diversity in Building Styles

- 12.4.54 The impact on landscape character and visual amenity would be further reduced by creating a deliberate diversity in building styles to help create the sense of an organically evolved settlement, such as that found within adjoining villages and towns.
- 12.4.55 Section 5.4 of the SDP (supported by the recommendations of the CKVS) requires the design of the settlement through the Tier 2 and Tier 3 planning stages to create “*distinctive places with clear contrasts in character between different parts of Otterpool Park.*”

Built Development Form & Massing

- 12.4.56 Section 4 of the SDP also sets out a number of “specifications have been approved to ensure the settlement is sensitively integrated into the surrounding landscape and Kent Downs AONB.” Those regarding the orientation, positioning, form and massing of new built development which would act to reduce impacts upon the identified landscape character and visual amenity receptors (particularly upon those viewing the site from surrounding areas, including the AONB and the escarpment of the North Downs) are set out below

Visually Considerate Orientation and Positioning

- 12.4.57 The SDP (at Section 5.1) requires that the design codes and detailed masterplans produced at the Tier 2 and Tier 3 planning stages must demonstrate that large buildings are generally orientated “*such that their gabled end elevations (rather than long sided parallel elevations) are presented towards the elevated views on the North Downs escarpment.*”
- 12.4.58 For the same reasons it advocates the general positioning of “larger buildings in areas of larger scale, flat, less prominent, open, and/or geometrically-structured landscape e.g. the race course, and between Hillhurst Farm and the railway, and so avoid their use in smaller scale, organic, intimate and complex areas and/ or elevated e.g. Barrow Hill and alongside the Site’s watercourses.”

Visually Considerate Built Form Massing

- 12.4.59 To reduce the discordant effects of larger buildings (e.g. schools and commercial property) upon landscape character and visual amenity the SDP (at Section 5.1) requires the offsetting of “*buildings from adjacent sized ones and/or creating two or more conjoined smaller structures rather than one large one, where feasible*”, and to avoid a visual perception of near-continuous roofscape by “*creating meaningful spaces between blocks of buildings.*”

Visually Considerate Architectural Form

- 12.4.60 Section 5.1 of the SDP stresses the adoption of the following measures to break up the perceived mass and scale of large buildings:
- “green/brown roofs on the larger buildings where feasible”;
 - the substitution of “larger areas of single material finishes on building elevations with a layering of materials, design breaks, and shadow projections”; and
 - the “use colour and colour combinations” and colour changes following “the form of the building, for example, in reveals, returns, interlocking roofs, entrances and other design breaks.”
- 12.4.61 This is supported by the site specific colour palette, set out in the CKVS (which is referenced in the SDP), for use in the planning and detailing of the proposed Development.

Built Development Density

- 12.4.62 The density of proposed houses within the proposed Development has not been determined at this stage in the planning process. Instead, the subsequent detailed Design Codes and masterplans (that would be prepared during the Tier 2 planning stage) for each individual phase of the proposed Development will shape the range of densities within that area, and where each are located. The proposed densities would depend upon the location of particular land-uses within that phase, the desired characteristics of that phase, and the planned building heights.
- 12.4.63 In order to reduce impacts on the identified landscape character and visual amenity receptors (particularly those around the immediate edge of the site and with views to it from the escarpment of the North Downs) the further following measures to vary the building density across the proposed Development would be adopted.

Gradation of Density Towards the Development's Edges

- 12.4.64 Section 5.1 of the SDP requires the “outer edges of development blocks, fronting sensitive open spaces would be of a lower density to create more permeable edges and ensure less of a sharp contrast in character.” To achieve this, housing density towards the rural edges of the site would be “scaled down to detached and small terraces of homes - some grouped as loose courts and some fronting areas of open landscape.”

Diversity in Density to Accentuate Settlement Legibility and Character

- 12.4.65 The specifications set out in the SDP that “have been approved to ensure the settlement is sensitively integrated into the surrounding landscape and Kent Downs AONB” include “*using density to help create a visually legible hierarchy, gradation and distinction between the different places and neighbourhoods across the Scheme, with highest densities in the town centre and local centres*”.
- 12.4.66 This is supported by the CKVS which advocates applying a “variety in the density of dwellings - between the proposed Development’s rural edges (4 dwellings per hectare) and its urban core (up to 100 dwelling per hectare) and avoiding an even spread of density across large areas.”

Built Development Heights

- 12.4.67 In terms of ‘Scale’, the height, width and length of each potential building in relation to its surroundings is reserved within the OPA. Parameters for the maximum height of proposed buildings above existing ground levels for the different parts of the proposed Development, however, are set out on Parameter Plan *OPM(P)4003 – Building Heights*.
- 12.4.68 The ‘worst-case’ scenario whereby all buildings would be the maximum height within the proposed Development areas shown has been adopted in the LVIA when assessing the overall effects of the proposed Development upon landscape character and visual amenity.

Sensitive Consideration of Building Heights

- 12.4.69 Having regard for Parameter Plan *OPM(P)4003 - Heights* and the descriptions relating to proposed building heights within Section 5.1 the SDP (supported by the recommendations with the CKVS), the following mitigation measures to reduce adverse effects upon the identified landscape character and visual amenity receptors (particularly upon those viewing the site from surrounding areas, including the AONB and the escarpment of the North Downs) are considered to be in place:

- There would be a variety in building heights across the proposed Development (i.e. higher rooflines in the town centre and local centres, and the lower heights around some of the proposed Development's edges) to help create a visually legible hierarchy, and gradation and distinction between the different places and neighbourhoods.
- There would be a variety in roofscape heights within different character areas of the proposed Development, including the use of 'landmark' and 'gateway' buildings to reduce the perception of a homogenous form, or 'sprawl', to the settlement when seen in views from both within and outside of it.
- Placing lower height buildings in areas of greater visibility from views into the site from sensitive receptors.
- Avoiding the placement of buildings with heights that noticeably break the skyline in views from the North Downs escarpment,
- Designing buildings whose heights and separation distances respect the scale of existing residential buildings outside of the Application Site (and those that are retained inside of the Application Site) that they are adjacent or near to, to help prevent structures being discordant in character or overbearing to the receptors within them and/or their curtilages.

Built Development Character

12.4.70 In terms of 'appearance', those aspects of a potential building or place which determine the visual impression they impart, including their external built form, their architecture, materials, decoration, lighting, colour, and texture are all reserved within the OPA.

12.4.71 The OPA seeks approval, however, of the 'design principles' set out in the SDP relating to development character of built form which are to be applied to the future masterplans and Design Codes in the Tier 2 planning stage and the reserved matters applications in Tier 3 planning stage, and which assist in reducing the impacts upon landscape character and visual amenity.

Character Area Diversity and Distinction

12.4.72 The SDP responds to the site-specific landscape character assessment (ES Appendix 12.1) through the creation of the seven proposed new character areas described in the SDP. The realisation of these through the Tier 2 and Tier 3 planning stages are fundamental in creating character distinction to the settlement as whole. In addition, they would significantly contribute to the proposed Development's legibility as a town, rather than a homogenous settlement when seen in views from both within and outside of it, and so overall reduce the impacts upon landscape character and visual amenity.

Creating Intimate Visual Character and Variety

12.4.73 SDP Site-Wide Principle number 4) states that "landmarks and gateways would be included within the proposed Development in terms of buildings, unique landscape features, and the spaces to which they relate. These include: locating gateways at key entry points into the proposed Development areas; positioning landmarks to terminate important view lines into and within the proposed Development; and responding to topography - e.g. where appropriate to the character, locating a landmark in a visually prominent position."

12.4.74 SDP Site-Wide Principles numbers 14), 15), 16) & 17) stress the importance of creating varied visual character in terms of the built-form along a street, within a phase and between different phases, through variety in: building form; building

heights; set-backs from the street; relationships between adjacent buildings; roof form, type and orientation; and fenestration.

Local Vernacular Character

12.4.75 SDP design principle number 18) determines that character would also be formed by using a variety of site-appropriate externally facing building materials, i.e. red clay bricks and tiles (both for roofs and walls); flint; sandstone; timber weatherboarding; timber framed buildings; and painted bricks. It states that the approach to materials and detailing should have regard for the recommendations for the detail of building design as identified in the 'CKVS'.

12.4.76 The CKVS advocates the:

- development of a varied roofscape which draws upon the styles and materials (i.e. slate and clay tile) found within the local area (including barn roofs, cat-slides, low eaves, large and steep 45 degree pitches) and which creates simple, bold roof lines with occasional sculptural chimney details;
- design of buildings with ground floor plinths different (and occasionally inset) from those of the upper floors, and whose materials (e.g. brick, Kentish Ragstone rubble and flint) and form often extend into the adjoining freestanding walls;
- employment of a variety of façade materials (including brick, tile-hanging and weatherboarding) depending upon buildings' geographic orientation – e.g. darker coloured matt materials on north elevations and minimal fenestration, and brighter coloured/ greater fenestrated south facing elevations;
- creation of crafted and patterned brick facades on simple architectural forms using predominantly soft orange and red brick stock with light grey mortared joints;
- assurance that there are a variety in window details across the proposed Development to create at the same visual diversity and interest that is found in settlements that have grown organically;
- use of a defined colour palette for visible building materials within the proposed Development that draws upon the existing colours and hues of existing built form and the landscape, and which supports use of darker tones in those facing towards the escarpment and scarp slopes of the North Downs – as highlighted in the Kent Downs AONB Guidance on the selection and use of colour in development – Guidance (Ref 12.45)

Visible Heritage

Improved Integration of Heritage in the Landscape

12.4.77 The Heritage Strategy establishes a set of actions to integrate the site's existing heritage into the design of Otterpool Park. Those that are relevant to the offsetting of landscape character and visual amenity effects are:

- Enhancement of the building, curtilage and historic parkland of Westenhanger Castle, including: removal of the current temporary and buildings surrounding it (including those associated with Folkestone Racecourse); clearance of some of the trees within the moat and between the Castle and its historic parkland to the south; restoration of the retained buildings' fabric; creation of a publicly accessible parkland to its south which would include restoration of the historic causeway to the Castle from the A20, and the creation of ornamental spaces (a Tudor Garden and Orchard) near to the building with semi-naturalistic areas beyond.

- Retention and or interpretation through public art of key areas of Lympne Airfield’s military heritage, and their integration into the proposed Development, including the former north west – south east aligned runway, some of the WWII pill boxes and the Battle HQ.
- Retention of the pre-historic barrows across the site, their encompassment with areas of green space, and the preservation of views between groups of them.
- Interpretation of the buried remains of the Roman villa, located between the A20 and the site of the proposed Otterpool Country Park, with publicly accessible above-surface way marking.
- Preservation of built features of Folkestone Racecourse (including the winners circle and ornamental pond) within publicly accessible areas of the proposed Development. Marking of parts of the racecourse circuit through the public realm of the surrounding proposed built-form.
- Preservation and adaptation of the farmhouse, courtyard barn and curtilage open spaces of Hillhurst Farm as part of the proposed business development area that would surround it.

Lighting & Reflectivity

12.4.78 Whilst at this outline planning stage there is no lighting design or site-wide lighting strategy, key measures regarding the mitigation of adverse impacts on landscape character and visual amenity arising (particularly upon those viewing the site from surrounding areas, including the AONB and the escarpment of the North Downs) from the potential lighting and reflectivity of the proposed Development are embedded into section 4 of the SDP and supported by the GI-Strategy.

Lighting Control

12.4.79 The detailed assessment and design of lighting through the future Tier 2 and Tier 3 planning stages should comply with the criteria for those Environmental Zones that are to be agreed with the local planning authority, as set out in the GNROL (as referenced in section 5.1 of the SDP) with regards to light spill, glare and sky glow.

12.4.80 In addition, the preparation of a lighting strategy in Tier 2 and detailed lighting proposals in Tier 3 (that both accord to the GNROL in this regard) would be a condition to the OPA.

Lighting Mitigation Measures

12.4.81 Section 5.1 of the SDP states that the proposed Development’s lighting design should accord with the recommendations of GNROL. The recommendations within GNROL that are applicable to the proposed Development are set out in paragraph 4.3.7 of the GI- Strategy. It states that:

- The quantity and illumination of the lighting proposed should be limited to the minimum necessary;
- All lighting is positioned and directed only to where it is required to minimise glare, spillage and sky glow, no direct upward light;
- The lighting design shall comply with the lighting levels, uniformity and other parameters of current and relevant lighting standards and higher than recommended lighting levels should be avoided;
- Consideration should be given to timed and part-night lighting switching-off at quiet times; and
- Use physical barriers e.g. proposed buildings and planting to reduce the effects of installed artificial light sources on sensitive receptors.

Reflectivity Reduction Measures

12.4.82 Adopt measures, as set out in Section 4 of the SDP and in section 4.2.2 of the GI Strategy to reduce the potential reflectivity of built form in views from the north, such as:

- using low-transmissive tinted glass in north facing facades;
- using matt coloured louvres in front of large areas of fenestration;
- using dark coloured window frames (rather than white) to reduce contrast with the façade elements;
- avoidance of materials with a high gloss finish;
- avoidance of roof lights on north facing roof pitches; and
- orientate photo-voltaic cells to the south, so to reduce impact on the visual amenity of those receptors with views from the AONB (in particular from the North Downs escarpment)

Green Infrastructure

12.4.83 In terms of 'landscaping', any potential treatment of land for the purpose of enhancing or protecting the amenities of the site and the area in which it is situated, including hard and soft landscaping, planting, screening, surface materials, etc. is reserved within the OPA.

12.4.84 As set out on parameter plan *OPM(P)4002_YY – Open Space and Vegetation* (and as described in the SDP and in the OP-DS) the OPA, however, seeks:

- approval of the location and extent of the proposed strategic open spaces;
- the presumption towards the retention of existing vegetation where feasible; and
- the implementation of a site-wide structural vegetation planting programme.

12.4.85 To further assist in reducing adverse effects upon landscape character and visual amenity this assessment considers the following factors to be in place.

Substantial Proportion of Open Space

12.4.86 The OP-DS, supported by the GI-Strategy, determines that approximately 50% of the application site will be green space (this includes the 10-15% of the proposed Development areas that would be open space, but excludes the open space of private residential gardens). This substantial proportion of open space would reduce the impact on visual amenity in terms of better integrating the proposed Development into views from sensitive locations such as the North Downs escarpment.

Measures to Reduce Reliance on Existing Public Open Space

12.4.87 In addition to making available such a high proportion of publicly accessible open space within the proposed Development, Section 5.0 of the GI-Strategy makes commitments with regards to its design in terms of accessibility and multi-functionality (i.e. that it supports different forms of formal and informal recreation for all ages including parks, recreational woodland, sport pitches, allotments, traffic-free 'green routes', and different grades of play spaces). These factors would reduce the potential community's reliance on offsite areas of public open space and so reduce the impact on their landscape character and visual amenity.

Improvements to Aspects of the Intrinsic Landscape Character of the Area

12.4.88 Section 5.0 of the GI-Strategy makes commitments with regards the restoration, reinforcement and creation of a stronger and richer landscape structure across the site, with areas of woodland, open space and wetland.

Further Space for Green Infrastructure

12.4.89 Section 5.3 of the SDP confirms provision of space along each proposed street/road types for street trees.

Blue Infrastructure

Blue Infrastructure Proposals

12.4.90 The blue infrastructure proposals within the Water Cycle Strategy, ES Appendix 15.2, have also been designed to reduce adverse effects on landscape character and visual amenity by:

- conserving and reinforcing the landscape character of the East Stour River and its tributaries through the site, by retaining their sinuous nature, broadening their floodplains, and retaining existing riparian and marginal vegetation; and
- using local appropriate, visually inconspicuous measures to convey and hold back surface water and storm water as necessary, such as swales (shallow linear vegetated depressions which carry occasional water over the surface of the land to a water storage or discharge system), wet woodland, small-medium naturally shaped ponds, and ditches with adjoining hedgerows with trees.

Structural Planting

12.4.91 The structural planting proposals indicated upon Parameter Plan *OPM(P)4002 – Open Space & Vegetation*, and as referenced in the OP-DS and the SDP, would assist in reducing the adverse effects of the proposed Development upon landscape character and visual amenity.

12.4.92 Whilst the parameter plan shows the general location of the structural planting, the LVIA is also reliant on the further detailed commitments made upon this as set out in the GI-Strategy. This includes:

- the general principles for its planning, design, implementation and management set out at section 5.5 of the GI-Strategy's commitments;
- the detailed principles, management prescriptions and species palettes, per planting type, set out in section 6.4;
- the more detailed indicative planting layout shown in Figure 106 of the GI-Strategy (also shown on Figure 12.77 of the LVIA); and
- the proposed type, position and extent, phasing and purposes of each individual proposed planting unit set out in the table at section 6.5 (note: the coding of the structural planting units in the table refers to the following indicative phasing area names as shown in the SDP: 1 & 2 = Town Centre & Castle Park, 3 = Woodland Ridge, 4 = Hillhurst Farm, 5 = River Stour, 6 = Country Park, 7 = Hill Top, 8 = Airfield Park - the numerical order does not imply a chronological delivery of these phases).

Structural Planting Mitigation Commitments

12.4.93 The key mitigation-related purposes of the structural planting proposals (as set out in the sections of the GI-Strategy referenced above) that reduce adverse impacts on landscape character and visual amenity are to:

- help mitigate the landscape character and visual amenity effects arising from construction activity, lighting and movement upon sensitive receptors - particularly the existing and emerging areas of settlement;

- help visually integrate proposed built form, movement and lighting arising from the operational proposed Development and visually disperse larger areas of new buildings in views into, through and out of the site from sensitive receptors – particularly users of publicly accessible areas within the AONB, users of PRow and existing and emerging settlements;
- help create robust defensible boundaries and ‘strategic buffers’ along the boundaries of the settlement to check sprawl, and to conserve the individual identity of existing neighbouring settlements and the rural character surrounding them;
- help prevent the coalescence of the new settlement area with the existing surrounding settlements and so help retain their individual character and identity;
- reinforce and restore local landscape character, such as the creation of greater areas of woodland upon the slopes and ridge of the greensand ridge (to bolster the wooded skyline in views from the North Downs), and planting that reinforces existing or recreates lost field boundaries, tree belts and the lines of watercourses so creating a stronger, richer landscape structure, with a more wooded character throughout the area;
- support the creation of distinct character areas within the proposed Development;
- help integrate existing areas of built form and infrastructure (e.g. the Link Park Industrial Estate, HS1/railway line, and M20 the M20/A20 roundabout and the motorway services) into existing views across the surrounding landscape; and
- compensate for the loss of structural vegetation that would be removed to allow for the creation of a permeable settlement.

Structural Planting General Principles

12.4.94 In planning all new areas of structural planting section 5.5. of the GI-Strategy states that:

- Locally characteristic vegetative forms i.e. mixed native woodland with understorey, high canopy mixed native woodland, wet woodland, tree belt / shaw, high canopy tree belt / shaw, field corner planting, coppice, hedgerow, hedgerow with trees, key lone trees / tree clumps, orchard, tree lines / avenues, place-making distinctive single trees etc. shall be utilised to integrate the proposed Development into its landscape setting.
- New structural planting should not be implemented where it could harm the retention of existing structural vegetation and habitats and/or substantially inhibit construction of further phases of proposed Development.
- Structural planting areas are designed to provide multifunctionality including public access, ecological connectivity and SuDS.
- A palette of native and ‘near-native’ species, which generally reflects the local landscape character, but which also contains species that are more climate/disease-resilient, would be used.
- Planting areas should contain an 85% / 15% ratio of deciduous and evergreen species.
- Structural plant stock would be grown from both seed that has local provenance and seed from locations that currently reflect the anticipated climate characteristics of this area of Kent in coming decades.

- Individual structural planting areas, where possible, would include a variety of initial plant stock sizes to provide a balance between an ‘instant effect’ and the quicker growing characteristics of younger plant stock.
- The design of structural planting areas should consider the use of subtle landform in appropriate locations to help provide greater instant height to certain areas of new vegetation.
- The structural planting type-specific design principles set out in the GI-Strategy should be developed into a more detailed site-wide Structural Planting Strategy containing a more detailed planting palette and planting specification that all those designing, implementing, managing and maintaining both scheme/site-wide and phase/parcel-specific structural planting proposals use. This will ensure that the design, implementation, management and maintenance of the structural planting as a whole is consistent across the site, and so performs its function as quickly as possible.
- The Structural Planting Strategy should be consulted upon with key stakeholders such as F&HDC, KCC, the Kent Downs AONB Unit, and the Woodland Trust. The strategy should also remain flexible to adaptation during the life cycle of the proposed Development to allow for changes in response to plant disease or climatic conditions.
- The detailed design, implementation, management and maintenance of both scheme/site-wide and phase/parcel-specific structural planting must: adhere to the agreed site-wide Structural Planting Strategy; be based upon the planting proposals set out in appendix 6.5 of the GI Strategy (ES Appendix 4.11); accord to the general and planting-type specific design principles set out in section 5.5 and appendix 6.4 the GI Strategy (ES Appendix 4.11); and be informed by information collected in the further planning stages (such as detailed topographic and tree and vegetation surveys). This will ensure that the designs for the structural planting are consistent across the site, and are a harmonious combination of greater understanding of the site and original planting principles.
- A site-wide landscape management strategy for the establishment and on-going maintenance of the structural planting should be developed for use by all development phase and parcel developers. The high-quality approaches set out in this will ensure that all the planted areas would develop consistently as each other, and so perform their functionality as quickly as possible.

Structural Planting of Site-wide Importance

12.4.95 Section 5.5 of the GI-Strategy divides the proposed structural planting into:

- those units which are of site-wide importance (shown on parameter Plan *OPM(P)4002 – Open Space & Vegetation* and upon GI-Strategy Figure 106 / Figure 12.77 of the LVIA) and whose indicative location, form and extent can be determined at this stage of the tiered planning process (such as within the planned public open spaces, along the key movement corridors, and between/around/through the proposed Development areas as shown on the parameter plans); and
- those units of which cannot be determined until the further masterplanning, design codes and reserved matter applications are prepared (such as within minor, yet unplanned, public open spaces and along the secondary and tertiary roads through the development parcels - upon which there is currently insufficient masterplanning detail to determine even their indicative location).

12.4.96 The GI-Strategy identifies that it would the responsibility of the proposed Development’s ‘master developer’ (i.e. the OPA applicant) to implement and maintain

the structural planting units of site-wide importance *‘so that their existence is not threatened or compromised by the more narrow, confined demands and pressures associated with the design of individual parcels’*.

Advance Planting

- 12.4.97 The GI-Strategy also states that the structural planting units would desirably be planted by the master developer ‘in advance’ of the construction of proposed built development so allowing them to establish and mature, and so perform their visual integration and mitigation functions, earlier than it would if they were implemented once the rest of the built-development was completed.
- 12.4.98 This would accord with Policy SS7 of the F&HDC CSR - which states that advanced planting would benefit later phases of development, particularly from prominent locations visible from the AONB, and would help avoid, as far as possible, temporary loss of biodiversity value when construction begins. The policy also states that advanced woodland planting shall also be designed to relate to local landscape character, to prevent the coalescence of the new settlement with Lympe, to separate neighbourhoods within the settlement, and to provide distance buffers between the M20/High Speed transport corridor for noise and air quality mitigation purposes.
- 12.4.99 Whilst it is possible to plant some of the structural planting units ahead of the construction of the proposed Development areas they are most closely associated with, the GI-Strategy highlights that several related factors prevent the planting of all units in advance of any construction. These are:
- the nature of the current OPA stage does not indicate sufficient detail to determine the precise location of built form and hence the location of all structural planting (particularly in areas where there no existing field boundary to follow - so that further masterplanning is required to more precisely site these units);
 - not all the necessary land is in the ownership of the applicant; and
 - with a planned build-out period for the entire proposed Development of approximately 19 years, the order in which development parcels are constructed, and hence when planting is required is currently uncertain.
- 12.4.100 Subsequently, the GI-Strategy proposes a phased approach to the implementation of the site-wide structural planting units. As shown in the GI-Strategy Figure 106 / LVIA Figure 12.77:
- By year 5 following construction commencement those units that are of site-wide importance, which are also in areas currently under the ownership of the applicant, and whose extents and location can also be determined at this early stage of the planning process, would be implemented as part of the ‘advance planting’.
 - Following this, between year 5 and 10 following construction commencement those remaining units that are of site-wide importance, and which are not yet under the ownership of the applicant (but which are expected to be by then), and whose extents and location would have been more suitably determined by this time, would be implemented as part of the ‘advance planting’ – as they are still considered to provide a reasonable degree of visual integration of the later constructed phases of the proposed Development.
 - The remaining phase-specific structural planting units of site-wide importance (as shown on GI-Strategy Figure 106 / LVIA Figure 12.77) would be planted once key areas of the proposed built-development (e.g. primary roads) are constructed.

- The structural planting units that are likely to be situated within unplanned minor public open spaces and along the secondary and tertiary roads, whose extents cannot be determined until the masterplans, design codes and reserved matter applications for proposed Development areas are prepared, would be planted, where possible, as and when such areas are approved.

Structural Planting Growth Rates

12.4.101 In consideration of the growth rates of structural planting GLVIA3 states that: *“assumptions about plant growth or other changes over time should be realistic and not over optimistic. The design concept for the mitigation has to have a good chance of being achieved in practice to be taken seriously by the competent authority.”*

12.4.102 Therefore, the following assumptions are made with regards to the growth of the proposed Development’s proposed structural planting:

- The growth rates are based upon the findings outlined in IEMA – Knowledge Centre paper: *‘Predicting tree and hedge growth’* (Ref 12.46), personal professional experience, and familiarity with the site over a number of years that indicates:
 - that plant stock of greater maturity takes longer (up to 5 years) to overcome the shock of being re-planted;
 - that once they are through this initial period plants go through a phase of maximum extension growth;
 - that plant growth slows towards maturity; and
 - that recent planting in and around the site (particularly around the Lymgne Industrial Estate) shows better growth when planted into ‘natural’ ground as opposed to upon bunds, as such artificial landforms (as there are likely to contain a thinner amount of growing medium in which the plants can establish and thrive; are likely to contain a more compacted subsoil layer; being sloped, prevent proper irrigation; and, again being sloped, create more difficult maintenance conditions).
- Planting areas would include a mixture of transplants (on average 0.75m high above ground level at time of planting) and feathered trees (on average 2.00m high above ground level at time of planting) in order to provide some diversity in habitat structure and to provide some initial screening.
- Faster growing, more densely planted ‘nurse’ tree/scrub species are used at the edges of planting areas to provide shelter for slower, but more area-appropriate tree/scrub species which may suffer from suppressed growth if not protected.
- Plants grown in the UK using a mix containing seeds of local provenance as well as from more climate resilient areas.
- Most soils across the site are considered to be friable, deeply ploughed, loamy soils.
- All stock, until fully established, is suitably protected from browsing mammals with appropriate fencing and individual plant shelters.
- A landscape management and maintenance regime would be implemented until the planting area is fully established, which includes: replanting dead / dying / diseased / defective plant stock, thinning of planting stock to promote growth, watering in times of drought; and ensuring a 1.0m diameter weed-free zone around each plant.

12.4.103 Taking these factors into consideration the plant growth is expected to be:

- Transplants: 0.3m/year for years 0-5, and 0.5m/year for years 5-10, 0.5m/year for years 10-25, 0.4m/year for years 25-43 (final assessment scenario).
- Feathered: 0.2m/year for years 0-5, and 0.5m/year for years 5-10, 0.5m/year for years 10-25, 0.4m/year for years 25-43 (final assessment scenario).

12.4.104 Table 12-24 of this assessment sets out the anticipated heights that the proposed structural planting would be expected to have grown to by the assessment scenarios.

Table 12-24 Anticipated Structural Planting Heights

Assessment Scenarios / years following construction	Height of Structural Planting (the range given reflects that the planting would contain a mix of transplants and feathered trees)		
	'Advance' structural planting planted by year 5 (2028) following commencement of construction	'Advance' structural planting planted between years 6-10 (2029- 2033) following commencement of construction	Structural planting planted by final year of construction (2042)
5 years following construction commencement (2028)	0.75m – 2.00m	-	-
Assessment Scenario 1: Peak construction year (2030) (7 years following construction commencement)	1.35m – 2.40m	-	-
Assessment Scenario 2: Scheme completion/start of full operation (2042) (19 years following construction commencement)	6.75m – 7.50m	4.25m – 4.50m	0.75m - 2.00m
Assessment scenario 3: Year 15 of operation (2057) (34 years following construction commencement)	13.85m – 14.60m	11.75m – 12.50m	7.25m – 8.00m
Assessment scenario 4: Year 30 of operation (2072) (48 years following construction commencement)	19.85m – 20.20m	17.85m – 18.20m	14.25m – 14.80m

12.4.105 Table 12-25 (along with the structural planting tables contained in the section 6.5 of the GI-Strategy) sets out the approximate extents of the structural planting units. GI-Strategy Figure 106 / LVIA Figure 12.77 shows the indicative location the proposed structural planting blocks, and by which year following construction commencement it is anticipated they would be planted. These documents do not, however, set out/show the:

- structural planting units which cannot be determined until the further masterplanning, design code and reserved matter applications are prepared (such as within minor, yet unplanned, public open spaces and along the secondary and tertiary roads through the development parcels) upon which there is currently insufficient masterplanning detail to determine even their indicative location; and
- the likely breaks through the planting units that are necessary for the creation of movement corridors, as it is not possible to determine, at this stage in the tiered planning process, where these would be.

Movement & Access

12.4.106 In terms of 'means of access', the accessibility to and within the site for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and

circulation routes and how they fit into the surrounding network is reserved within the OPA. Parameter plan *OPM(P) 4001 – Development Areas and Movement Corridors* however, sets out for approval the indicative location of primary access arrangements and movement corridors.

12.4.107 Key measures regarding the mitigation of adverse impacts on landscape character and visual amenity arising from the access arrangements and movement corridors of the proposed Development which are embedded into the design for approval are set out below.

Retention of Public Rights of Way Routes

12.4.108 To assist in the mitigation of adverse effects upon the visual amenity of users of the existing PRow within the site, all existing PRow within the application site boundary shall be retained along their general current route and alignment (as shown on Parameter plan *OPM(P) 4001 – Development Areas and Movement Corridors*).

12.4.109 In addition, most sections of the PRow network within the application site boundary would be accommodated within proposed open spaces and / or alongside a belt / line of structural planting (as shown on parameter plans *OPM(P) 4001 – Development Areas and Movement Corridors* and *OPM(P)4002 – Open Space & Vegetation*, and as described in the Appendix 2-Design Specifications of the SDP).

Considerate Access through Existing Structural Vegetation

12.4.110 Where any proposed access and movement corridors is required to cross through an existing area or line of structural vegetation the positioning of this would first utilise the existing gaps in these. Suitable tree quality and condition surveys (to BS:5837(2012)) would be used to determine the appropriate location of breaks where existing gaps do not exist.

Long Term Management of Strategic Green Infrastructure (including the Structural Planting)

12.4.111 The LVIA considers that the proposals set out in the Governance & Stewardship Strategy with regards to the establishment of a Governance Body to manage the majority of the strategic open spaces and GI estate would be in place so that the successful management of the structural planting and other LVIA mitigation-reliant elements of GI would be secured in the long term.

12.4.112 The Strategy states that a permanent governance structure will be established to ensure that the landscape, open spaces and new facilities are maintained to a high standard and that both current and future residents are involved in their planning and management.

12.4.113 Consequently, this assessment, when assessing the overall effects of the proposed Development upon landscape character and visual amenity, takes into account the ability of this organisation to maintain and manage the proposed areas of structural planting so they properly establish and perform their intended function of assisting in the visual integration of the proposed Development.

Area-specific Embedded Design Measures

12.4.114 The embedded design measures set out in Table 12-25 are those that are specific to the LCAs identified in the site-Specific Landscape Character Assessment (ES Appendix 12.1) whose extents lie fully within or partially within the site. As with the site-wide measures, these have been developed through the iterative design process, and along with the site-wide measures they would act to avoid or prevent significant adverse effects occurring, or would act to reduce the significance of the effect upon landscape character and visual amenity receptors through the operation of the proposed Development.

12.4.115 They include measures proposed within the parameter plans, the OP-DS and Section 4.0 of the SPD – which provides phase/character area specific design principles that are relevant to the LVIA.

Table 12-25 Embedded Design and Mitigation Measures associated with the site-specific Landscape Character Assessment.

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
<p>1. Lower East Stour River Corridor</p>	<p>Proposed Land-use, open space (Barrow Hill Park) with pedestrian / cycle paths and housing.</p>	<p>Proposed native species hedgerow with trees (7Y) would be planted to conserve and reinforce the corridor of the East Stour River.</p>	<p>The landscape character of LCA SDC-11</p>
	<p>Maximum Building Height (above existing ground levels): up to 12m.</p>	<p>Proposed substantial 10-15m wide scalloped-edged native species tree belts (7F) and wet woodland belts (7Z) would be planted along the site’s northern boundary within this LCA to assist in visually integrating the proposed Development into its setting.</p>	<p>The visual amenity of the users of PRow HE302 within the site, users of PRow within 2km and between 2-4km to the north of the site, and residents of Sellindge.</p>
	<p>Proposed additional Built Infrastructure: waste water treatment works.</p>		
	<p>Proposed Green Infrastructure: sports pitches, informal recreational paths, allotments, riparian habitat, woodland blocks, tree belts, shaws, wet woodland and hedgerow.</p>	<p>Design of the WWTW as an attractive, well integrated ‘barn’-like structure with appropriate yet discreet access within wetland landscape.</p>	<p>The visual amenity of the users of PRow HE302 within the site, users of PRow within 2km, and between 2-4km to the west of the site, and users of local roads within 0-2km of the site i.e. Harringe Lane.</p>
		<p>Proposed substantial 20-30m wide native species tree belts would be planted along the site’s western boundary (7B) and around the waste water treatment works (7A & 7AA) within this LCA to assist in visually integrating the proposed Development into its setting, to reinforce the existing defensible edge of Harringe Lane, and to provide a defensible edge along this side of the overall proposed Development.</p>	
<p>Existing field boundaries throughout would be strengthened with proposed native tree and</p>		<p>The landscape character of this LCA: SDC-11.</p>	

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>hedgerow vegetation (7E) to assist in visually integrating the proposed Development into its setting.</p>	
		<p>No floodlighting to the proposed sports pitches within this site-specific LCA.</p>	<p>The visual amenity at night of the: residents of Sellindge; residents of Harringe Court; users of PRoW HE302 within the site; users of localised/close range PRoW within 2km to the south and west of the site; users of the NDW-NT; users of intermediate/medium range PRoW between 2-5km to the north and west of the site; users of Open Access Land upon the North Downs scarp slopes within medium range; and users of roads within 0-2km of the site i.e. Harringe Lane.</p> <p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07, 08 and 09; ABC-10, 29 and 25; and ABC-AONB-01, 02 and 03.</p>
		<p>A proposed 40-85m wide public open space containing 20m wide tree belts (7U and 7X) and hedgerows (7W) would be created between the edge of the rear gardens of the settlement of Barrow Hill and the nearest areas of proposed housing to assist in visually integrating the proposed Development into its setting.</p>	<p>The visual amenity of the users of PRoW HE303 within the site, and the residents and users of the settlement of Barrow Hill.</p> <p>The Individual townscape identity of the settlement of Barrow Hill.</p>
<p>2. Harringe Open Farmland Slopes</p>	<p>Proposed Land-use: open space (Barrow Hill Park) with pedestrian / cycle paths housing.</p>	<p>Proposed substantial 30m wide native species tree belts (7D) and coppice woodland blocks (7C) would be planted along the western boundary of the site through this site-specific LCA to assist in visually integrating the proposed Development into its</p>	<p>The visual amenity of: the residents of Harringe Court, Court-at-Street and Aldington Church; users of localised/close range PRoW within 2km to the west of</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
	<p>Maximum Building Height (above existing ground levels): up to 12m</p> <p>Proposed additional Built Infrastructure: secondary and tertiary roads and road bridges across the minor watercourse.</p> <p>Proposed Green Infrastructure: sports pitches, informal recreational paths, woodland burial area, riparian habitat, woodland blocks, tree belts, shaws, wet woodland and hedgerow.</p>	<p>setting and to provide a defensible edge to it along its this edge.</p> <p>Lower density built form on the site's west side interspersed with green spaces (containing tree belts) to form a transition, and a robust edge to surrounding countryside.</p> <p>Views to the North Downs escarpment from the upper areas of this site-specific LCA (outside of the site boundary) over the top of proposed structural planting, particularly between Harringe Lane and Springfield Wood, from PRoW HE302 have been retained.</p> <p>Existing field boundaries throughout would be strengthened with proposed 15m wide native tree belts (7O, 7P, 7Q & 7R) and tree lines (7N) to assist in visually integrating the proposed Development into its setting.</p> <p>No floodlighting to the proposed sports pitches within this site-specific LCA.</p>	<p>the site; and users of roads within 0-2km of the site i.e. Harringe Lane.</p> <p>The visual amenity of: users of localised/close range PRoW within 2km to the west of the site; and users of roads within 0-2km of the site including Harringe Lane.</p> <p>The landscape character of this LCA: SDC-11.</p> <p>The landscape character of this LCA: SDC-11.</p> <p>The visual amenity at night of the: residents of Sellindge; residents of Harringe Court; users of PRoW HE302 within the site; users of localised/close range PRoW within 2km to the south and west of the site; users of the NDW-NT; users of intermediate/medium range PRoW between 2-5km to the north and west of the site; users of Open Access Land upon the North Downs scarp slopes within medium range; and users of roads within 0-2km of the site i.e. Harringe Lane.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
			<p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07, 08 and 09; ABC-10, 29 and 25; and ABC-AONB-01, 02 and 03.</p>
		<p>10-15m wide proposed native species tree belts / wet woodland belts (7H & 7K) would be divide the proposed Development areas in the adjacent site-specific LCA no.3. to assist in visually integrating them into its setting.</p>	<p>The visual amenity of the residents of Harringe Court, and users of localised/close range PRoW within 2km to the west of the site; and users of roads within 0-2km of the site i.e. Harringe Lane.</p>
<p>3. Somerfield Court Open Farmland Slopes</p>	<p>Proposed Land-use: open space, housing, education, local commercial centre. Building Height Range (above existing ground levels): up to 12m. Proposed additional Built Infrastructure: primary, secondary and tertiary access roads. Proposed Green Infrastructure: village green, school playing fields, areas of equipped and natural play, riparian habitat, tree belts, hedgerows and street trees.</p>	<p>The arrangement of proposed development areas, access roads and public open space across this site-specific LCA would reflect the distinctive shape of the underlying outlier/knoll landform and retain existing vegetated field boundaries. Urban blocks would be developed within a framework of 15m wide native tree belts (7K, 7L, 7M, 7O & 7R) and tree lined streets (7J) and edges (7I) loosely radiating out from the landform and running along its contours. The placement of the proposed lowest height Development areas within this site-specific LCA. The built form on the edges of proposed Development area would have a reduced density and would be integrated with green spaces (containing tree belts along the site's west side) to form transition and robust edge to surrounding countryside.</p>	<p>The landscape character of this LCA: SDC-11. The visual amenity of: users of localised/close range PRoW within 2km to the north and west of the site; users of the NDW-NT; users of intermediate/medium range PRoW, between 2-5km to the north and west of the site; and users of Open Access Land upon the North Downs scarp slopes within medium range. The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07, 08 and 09; ABC-10, 25, and 29; and ABC-AONB-01, 02 and 03.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>The positioning of the proposed local centre upon the brow of Barrow Hill, making visually apparent the planned pattern of a nucleated settlement so that a clear understanding of its purpose is possible, and so that it is not visually perceived simply as 'sprawl'.</p>	<p>The visual amenity of: the residents of the settlement of Barrow Hill and Harringe Court; users of localised/close range PRoW within 2km to the north, south and west of the site; users of intermediate/medium range PRoW between 2-5km to the north and west of the site; users of the NDW-NT; users of Open Access Land upon the North Downs scarp slopes within medium range; and users of roads within 0-2km of the site i.e. Harringe Lane.</p>
		<p>Existing field boundaries throughout would be strengthened with proposed native tree and hedgerow vegetation, and 10-20m wide proposed native species tree belts (3K, 3L, 7S, 7T) would be planted to divide proposed Development areas in this site-specific LCA, to assist in visually integrating them into their setting, and which also restores a stronger landscape pattern.</p>	<p>The visual amenity of: the residents and users of The settlement of Barrow Hill, Court-at-Street, Aldington Church, Brabourne and Harringe Court; users of localised/close range PRoW within 2km to the north, south and west of the site; users of intermediate/medium range PRoW between 2-5km to the north and west of the site; users of the NDW-NT; users of Open Access Land upon the North Downs scarp slopes within medium range; and users of roads within 0-2km of the site i.e. Harringe Lane.</p> <p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07, 08 and 09; ABC-10, 25, 29, 30 and 31; and ABC-AONB-01, 02 and 03.</p>
		<p>A proposed 40-85m wide public open space containing 20m wide tree belts (7U and 7X) and hedgerows (7W) would be created between the edge of the rear gardens of the settlement of Barrow Hill and the nearest areas of proposed housing to</p>	<p>The visual amenity of the users of PRoW HE303 within the site, and the residents and users of the settlement of Barrow Hill.</p> <p>The Individual townscape identity of the settlement of the settlement of Barrow Hill.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>assist in visually integrating the proposed Development into its setting.</p>	
<p>4. Harringe Brooks Woodland</p>	<p>Proposed Land-use: n/a. Building Height Range: n/a. Proposed additional Built Infrastructure: n/a. Proposed Green Infrastructure: areas of informal recreation within the buffer strip outside of the designated Ancient Woodland boundary.</p>	<p>A proposed approximate 50m wide open space buffer would be created between the edge the woodland and the closest area of proposed built proposed Development.</p>	<p>To maintain the integrity of the woodland and its visual distinctiveness in the surrounding landscape, and assist in the mitigation of effects upon the landscape character of LCAs: SDC-11.</p>
<p>5. Otterpool Manor Open Farmland Slopes</p>	<p>Proposed Land-use: open space, housing, education, local commercial centre. Building Height Range (above existing ground levels): 12m to 15m. Proposed additional Built Infrastructure: Primary, secondary and tertiary access roads. Proposed Green Infrastructure: Local 'green' school playing fields, areas of equipped and natural play, tree belts, orchard,</p>	<p>A proposed open space buffer around the residual estate of Otterpool Manor would be created to conserve the farmstead's immediate rural setting, and conserve publicly accessible views out from this area to the North Downs escarpment.</p> <p>The placement of the proposed tallest Development areas within this site-specific LCA on the lowest part of its northern side, away from the southern boundary of the site from the upper slopes of the greensand ridge.</p>	<p>The visual amenity of users of PRoW HE315 (that runs through this farmstead) and of Otterpool Lane.</p> <p>The landscape character of LCA SDC-11</p> <p>The visual amenity of: users of localised/close range PRoW within 2km to the north, west and south of the site; the residents and users of Court-at-Street and Aldington Church, Brabourne; users of the NDW-NT; users of intermediate/medium range PRoW, between 2-5km to the north and west of the site; and users of Open Access Land upon the North Downs scarp slopes within medium range.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
	<p>hedgerows, tree clumps and street trees.</p>	<p>Existing field boundaries would be strengthened with proposed native tree and hedgerow vegetation and 12.5-20m wide proposed tree belts would be planted through the centre (3D, 3G, 3H, 3K and 3P) and along parts of the eastern (3E, 3F, 3I, 3J & 3N) western (3C) and northern (3M & 3O) boundaries of the proposed Development areas within this site-specific LCA to assist in: visually integrating them into their setting, ameliorating existing views to the Lympe Industrial Estate; and restoring a stronger landscape pattern throughout the site Specific LCA.</p> <p>12.5m wide proposed tree belts (3A & 3B) would be planted along the southern edge of this site-specific LCA to assist in visually integrating the proposed Development into its setting, and to create better definition between it and the parkland estate of Port Lympe Animal Park.</p>	<p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07, 08 and 09; ABC-10, 25, 29, 30 and 31; and ABC-AONB-01, 02 and 03.</p> <p>The visual amenity of: users of PRoW HE316 within the site; the residents of the settlement of Barrow Hill, Court-at-Street, Aldington Church, Brabourne, and Otterpool Manor; users of localised/close range PRoW within 2km to the north, south and west of the site; users of intermediate/medium range PRoW between 2-4km to the north and west of the site; users of the NDW-NT; users of Open Access Land upon the North Downs scarp slopes within medium and long range; and users of roads within 0-2km of the site i.e. Otterpool Lane.</p> <p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07, 08 and 09; ABC-10, 25, 29, 30 and 31; and ABC-AONB-01, 02 and 03.</p> <p>The visual amenity of users of the Port Lympe Animal Park (arriving and leaving along the entrance drive off Otterpool Lane) and users of roads within 0-2km of the site i.e. Otterpool Lane.</p>
<p>6. Port Lympe Wooded Parkland</p>	<p>Proposed Land-use: n/a. Building Height Range: n/a.</p>	<p>12.5-20m wide proposed tree belts (3A, 3B & 3C) would be planted along the northern edge of this site-specific LCA to assist in visually integrating the proposed Development into its setting, and to create</p>	<p>The visual amenity of users of the Port Lympe Animal Park (arriving and leaving along the entrance drive off Otterpool Lane) and users of roads within 0-2km of the site i.e. Otterpool Lane.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
	<p>Proposed additional Built Infrastructure: n/a. Proposed Green Infrastructure: areas of structural planting within adjacent LCAs.</p>	<p>better definition between it and the parkland estate of Port Lymgne Animal Park. The placement of the proposed tallest Development areas within the area of the site closest to this away from its edge – i.e. away from the upper slopes of the greensand ridge.</p>	<p>The visual amenity of users of the Port Lymgne Animal Park (arriving and leaving along the entrance drive off Otterpool Lane).</p>
<p>7. Barrow Hill, Linear Settlement</p>	<p>Proposed Land-use: n/a. Building Height Range: n/a. Proposed additional Built Infrastructure: n/a. Proposed Green Infrastructure: areas of structural planting within adjacent LCAs.</p>	<p>A proposed 40-85m wide public open space containing 20m wide tree belts (7U and 7X) and hedgerows (3M & 7W) would be created between the west edge of the rear gardens of the settlement of Barrow Hill and the nearest areas of proposed housing to assist in visually integrating the proposed Development into its setting. A proposed 10m wide tree belt (5I) and hedgerow with trees (5J) along the east edge of the settlement of Barrow Hill (where the existing residential properties here already have relatively long and well vegetated rear gardens) would be planted to assist in visually integrating the proposed Development into its setting and conserving the Individual townscape identity of the settlement of Barrow Hill. A proposed landscape of trees, sports pitches, and riverside parkland would be created along the south-east edge of the settlement of Barrow Hill to assist in the retention of existing views from this part of settlement area across the open landscape and to the North Downs escarpment.</p>	<p>The visual amenity of the users of PRoW HE303 within the site, and the residents and users of the settlement of Barrow Hill. The landscape character of LCA SDC-11. The visual amenity of the users of PRoW HE271A within the site, and the residents and users of the settlement of Barrow Hill. The landscape character of this LCA: SDC-11. The visual amenity of the residents and users of the settlement of Barrow Hill.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
<p>8. M20 / Railway Linear Infrastructure</p>	<p>Proposed Land-use: n/a. Building Height Range: n/a. Proposed additional Built Infrastructure: n/a. Proposed Green Infrastructure: areas of structural planting within adjacent LCAs.</p>	<p>N/A</p>	<p>N/A</p>
<p>9. Upper East Stour Open Farmlands</p>	<p>Proposed Land-use: formal and informal recreation; housing, education, local commercial centre. Building Height Range (above existing ground levels): 15-18m. Proposed additional Built Infrastructure: Primary, secondary and tertiary roads, 2no. bridges over the East Stour River. Proposed Green Infrastructure: informal and semi-naturalised riverside park, sports pitches, school playing fields, areas of equipped and natural play, riparian habitat, woodland blocks, wet woodland tree belts, hedgerows and street trees.</p>	<p>The existing wavy edge field boundaries already created by the East Stour River, and its tributaries would be retained and strengthened with hedgerow planting (1G, 5E, 5L) and areas of diverse semi-natural landscape. The placement of the proposed tallest development blocks within this site-specific LCA away from its edges with Westenhanger Castle and the settlement of Barrow Hill to assist in visually integrating this part of the proposed Development into its setting. The positioning of the proposed local centre near the brow of higher land within this site-specific LCA making visually apparent the planned pattern of a</p>	<p>The landscape character of this LCA: SDC-11 The visual amenity of: users of localised/close range PRoW within 2km to the north of the site; users of the NDW-NT; users of intermediate/medium range PRoW, between 2-5km to the north of the site; users of Open Access Land upon the North Downs scarp slopes within medium range; users and residents Westenhanger Castle; and residents and users of the settlement of Barrow Hill. The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07, 08 and 09; and ABC-AONB-01, 02 and 03. The visual amenity of: users of PRoW HE271A, 275 and 227 within the site; the residents and users of the settlement of Barrow Hill, Sellindge and Stanford;</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>nucleated settlement so that a clear understanding of its purpose is possible, and so that it is not visually perceived simply as ‘sprawl’.</p>	<p>users of localised/close range PRoW within 2km to the north of the site; users of intermediate/medium range PRoW between 2-5km to the north of the site; users of the NDW-NT; users of Open Access Land upon the North Downs scarp slopes within medium and long range; users of roads within the site i.e. A20 Ashford Road; and users of roads 0-2km of the site i.e. Kennett Lane.</p>
		<p>Existing field boundaries would be strengthened with proposed native tree lines (1C), and hedgerow with trees (1G, 5E, 5G & 5H) vegetation and 10-15m wide proposed native species tree belts (1F, 5C & 5D) would be planted between development blocks through the centre, along either side of the planned riverside park, and along the northern edge of the site-specific LCA (1A, 5A, 5B & 5K) to assist in visually integrating this part of the proposed Development into its setting. These belts would also restore a stronger landscape pattern throughout this site-specific LCA and reinforce the existing defensible edge created by the railway to the north.</p>	<p>The visual amenity of: users of PRoW HE271A, 275 and 227 within the site; the residents and users of the settlement of Barrow Hill, Sellindge and Stanford; users of localised/close range PRoW within 2km to the north of the site; users of intermediate/medium range PRoW between 2-5km to the north of the site; users of the NDW-NT; users of Open Access Land upon the North Downs scarp slopes within medium and long range; users of roads within the site i.e. Otterpool Lane and A20 Ashford Road; and users of roads 0-2km of the site i.e. Kennett Lane.</p> <p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 06, 07, 08 and 09; and ABC-AONB-01, 02 and 03.</p>
		<p>A proposed landscape of trees, sports pitches, and riverside parkland would be created along the south-east edge of the settlement of Barrow Hill to assist in the retention of existing views across the open landscape and to the North Downs escarpment.</p>	<p>The visual amenity of residents of the settlement of Barrow Hill and users of PRoW HE315 and HE275 within the site.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
<p>10. Upper Otterpool Enclosed Farmlands</p>	<p>Proposed Land-use: formal and informal recreation; housing, education. Building Height Range (above existing ground levels): 12-18m. Proposed additional Built Infrastructure: Primary, secondary and tertiary roads. Proposed Green Infrastructure: informal and semi-naturalised country park around the geological SSSI, informal and semi-naturalised riverside parkland, sports pitches, school playing fields, areas of equipped and natural play, allotments, riparian habitat, woodland blocks, shaws, tree belts, hedgerows, street trees.</p>	<p>Existing field boundaries would be strengthened with proposed 15m wide native tree belts (6I), field corner planting (6J), hedgerow vegetation (6F) and 10-20m wide proposed native species tree belts (6K, 6L, 8F & 8H), tree lines (6H, 6M, 6N & 6O) would be planted around and between development blocks through the centre, alongside of the East Stour River tributary, to assist in visually integrating this part of the proposed Development into its setting. These belts would also restore a stronger landscape pattern throughout this site-specific LCA.</p>	<p>The visual amenity of: users of PRoW HE314 within the site; the residents and users of Lymyne, Newingreen, and Brabourne; users of localised/close range PRoW within 2km to the north of the site; users of intermediate/medium range PRoW between 2-5km to the north of the site; users of the NDW-NT; users of Open Access Land upon the North Downs scarp slopes within medium and long range; and users of roads within 0-2km of the site i.e. Stone Street, Otterpool Lane and Kennett Lane.</p>
		<p>An informal country park would be created with native field corner tree planting (6E) and coppice (6G), 10-15m wide tree belts (6A, 6B), scrub and hedgerow planting, and tussocky grasslands which conserves the setting of the geological SSSI and the recently discovered Roman villa, which retains elements of this site-specific LCA's semi-naturalised character, and which create new publicly-accessible views to the North Downs escarpment.</p>	<p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 06, 07, 08 and 09; ABC-30 and 31; and ABC-AONB-01, 02 and 03.</p> <p>The landscape character of this LCA: SDC-11</p>
		<p>The placement of the proposed tallest development blocks within this site-specific LCA away from the upper slopes of the greensand ridge, and its edges with Upper Otterpool, Newingreen and Lymyne, the northern edge of the site to assist in visually integrating this part of the proposed Development</p>	<p>The visual amenity of: users of PRoW HE315 within the site; users of roads within 0-2km of the site i.e. Ashford Road, Otterpool Lane; and residents of Upper Otterpool.</p> <p>The visual amenity of: users of localised/close range PRoW within 2km to the north of the site; users of the NDW-NT; users of intermediate/medium range PRoW, between 2-5km to the north of the site; users of Open Access Land upon the North Downs scarp slopes within medium range; users and residents</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>into its setting and to avoid the introduction of built form that would break the skyline in views to it from the North Downs escarpment.</p>	<p>Westenhanger Castle; residents and users of the settlement of Barrow Hill. The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07, 08 and 09; ABC-30; and ABC-AONB-01, 02 and 03.</p>
		<p>The existing wavy edge field boundaries already created by the East Stour River, and its tributaries would be retained and strengthened with tree lines (1K), wet woodland (2B & 2F) hedgerow planting (2D) and areas of diverse semi-natural landscape created.</p>	<p>The landscape character of this LCA: SDC-11</p>
		<p>A proposed public open space would be created between the southern edge of Newingreen and the nearest areas of proposed housing to assist in visually integrating the proposed Development into its setting, reinforcing the existing defensible edge created by the Stone Street to the east, and protecting the individual identity of the settlement (as well as that of Lympne) and its rural setting. New orchard planting (6Q), hedgerow with trees (6P), and 10-15m wide tree belts (2E, 2G & 6R) would be used to reinforce the landscape structure in this area.</p>	<p>The visual amenity of: the residents and users of Newingreen and Lympne (including Berwick House); users of PRoW HE314 within the site; users of localised/close range PRoW, within 2km to the east of the site; and users of roads within 0-2km of the site i.e. Stone Street. The landscape character of LCA: SDC-12</p>
		<p>A proposed 75-175m wide public open space would be created between the edge of the built-up area of Lympne and the nearest areas of proposed housing to assist in visually integrating the proposed Development into its setting, avoiding coalesce, and</p>	<p>The visual amenity of the residents and users of Lympne.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>protecting individual identity of the village and its rural setting. New 20-30m wide tree belts (8C, 8D, 8F, 8G & 8H) field corner tree planting (8E) would be used to reinforce the landscape structure in this area.</p>	
<p>11. Lympne Plateau Industry</p>	<p>Proposed Land-use: Housing, local commercial centre. Building Height Range (above existing ground levels): Up to 15m. Proposed additional Built Infrastructure: Primary, secondary and tertiary access roads. Proposed Green Infrastructure: informal recreational routes. Woodland blocks, hedgerows, street trees.</p>	<p>The boundaries to this site-specific LCA (including at its entrance off Otterpool Lane) would be strengthened with woodland blocks (8M), proposed native tree line/avenue (8J), and hedgerow vegetation (8K) and 10m wide native species tree belts (8L) to assist in visually integrating this part of the proposed Development into its setting. These belts and woodlands would also restore a stronger landscape pattern throughout this site-specific LCA and ameliorate existing discordant views to the Lympne Industrial Estate.</p>	<p>The visual amenity of: users of PRoW HE316 within the site; the residents of Lympne, Newingreen; users of localised/close range PRoW within 2km to the north and west of the site; users of intermediate/medium range PRoW between 2-5km to the north and west of the site; users of the NDW-NT; users of Open Access Land upon the North Downs scarp slopes within medium and long range; and users of roads within the site i.e. Otterpool Lane.</p>
<p>12. Lympne Plateau Open Grassland</p>	<p>Proposed Land-use: informal recreation; housing, education. Building Height Range (above existing ground levels): 12-15m. Proposed additional Built Infrastructure: Primary, secondary and tertiary access roads. Proposed Green Infrastructure: informal and semi-naturalised</p>	<p>A proposed 75-175m wide public open space, woodland block (8C), and 30m wide tree belt (8D) buffer would be created between the edge of the built-up area of Lympne and the nearest areas of proposed housing to assist in visually integrating the proposed Development into its setting, avoiding coalescence with the village, protecting the individual identity of the settlement and its rural setting, creating a defensible edge to the proposed Development, and allow retention of views out from here to the North Downs escarpment.</p>	<p>The visual amenity of the residents and users of Lympne. The landscape character of LCA: SDC-11.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
	<p>parkland, areas of equipped and natural play, allotments.</p>	<p>A proposed 75m minimum wide public open space, field corner planting (8B), and 15m wide tree belt (8A) buffer would be created between the B2067 Aldington Road and the nearest areas of proposed housing to assist in visually integrating the proposed Development into its setting, creating a defensible edge to the proposed Development, and allow retention of views out from here to the North Downs escarpment.</p>	<p>The visual amenity of: the residents of properties along Aldington Road; users of localised/close range PRoW within 2km to the south of the site; and users of the SSW-LDP.</p>
		<p>The placement of the proposed tallest development blocks within this site-specific LCA away from the crest of the greensand ridge, the southern edge of the site, and its boundary with Lympne, to assist in visually integrating this part of the proposed Development into its setting, and to maintain a wooded crest to the greensand ridge in views from the North Downs escarpment.</p>	<p>The visual amenity of: users of the SSW-LDP; users of localised/close range PRoW within 2km to the north and south of the site; users of the NDW-NT; users of intermediate/medium range PRoW, between 2-5km to the north of the site; and users of Open Access Land upon the North Downs scarp slopes within medium and long range.</p>
		<p>10-20m wide tree belts (8I, 8P, 8Q & 8R) and hedgerows with trees (8N) would be planted along the edges and through the centre (including alongside the line of the old airfield runway 8O) of areas new built development within this LCA to assist in: visually integrating them into their setting; ameliorating existing views to the Lympne Industrial</p>	<p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07 and 08; and ABC-AONB-01, 02 and 03.</p> <p>The visual amenity of: users of the SSW-LDP; users of localised/close range PRoW within 2km to the north and south of the site; users of the NDW-NT; users of intermediate/medium range PRoW, between 2-5km to the north of the site; and users of Open Access Land upon the North Downs scarp slopes within medium and long range.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>Estate; restoring a stronger landscape pattern throughout the site Specific LCA; and reflecting the airfield's history.</p>	<p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 07, 08 and 09; ABC-30; and ABC-AONB-01, 02 and 03.</p>
<p>13. Westenhanger Scattered Settlement</p>	<p>Proposed Land-use: formal and informal recreation; housing, education, the main transport hub at Westenhanger Station, the main commercial centre, cultural facilities, business premises and community buildings.</p> <p>Building Height Range (above existing ground levels): 15-18m.</p> <p>Proposed additional Built Infrastructure: primary access roads, including re-routing of the A20. The main high street for the town. Upgrading of the transport interchange at Westenhanger Station.</p> <p>Proposed Green Infrastructure: informal and formal open space, town park between Westenhanger Castle and the A20 Ashford Road, school playing fields, areas of equipped and natural play, allotments. Riparian habitat,</p>	<p>Retention of some of the existing mature trees around the existing racecourse buildings and planting of 10m wide proposed tree belts (1B & 1J) along the northern boundary of the site (so reinforcing the existing defensible edge created by the railway to the north), along the edge with the settlement of Westenhanger (1H), and tree planting around the edge of the built development (1C, 1D & 1E) within this site-specific LCA to assist in: visually integrating them into their setting and restoring a stronger landscape structure throughout.</p> <p>The proposed conservation and reinforcement of the existing landscape pattern that the East Stour River, and its tributaries, have already created. The old Racecourse pond and the watercourse from here to the East Stour River would be retained and strengthened with new riparian planting, and areas of diverse semi-natural landscape created.</p> <p>The placement of the proposed tallest development blocks within this site-specific LCA away from its edges with Westenhanger Castle and the settlement of Westenhanger to assist in visually integrating this part of the proposed Development into its setting.</p>	<p>The visual amenity of: residents and users of Westenhanger and Stanford; users of the PRoW HE227; users of Stone Street; users of localised/close range PRoW within 2km to the north of the site; users of intermediate/medium range PRoW, between 2-5km to the north of the site; users of the NDW-NT; and users of Open Access Land upon the North Downs scarp slopes within medium and long range.</p> <p>The landscape character of LCA SDC-11</p> <p>The visual amenity of: users of the PRoW HE227; users and residents Westenhanger Castle; and residents and users of Westenhanger.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
	<p>woodland blocks, shaws, tree belts, hedgerows, street trees.</p>	<p>Ensure sensitive treatment of the phase's edges adjoining existing communities.</p>	
		<p>The creation of a historically appropriate and publicly accessible parkland setting to Westenhangar Castle from its southerly edge to the A20 Ashford Road (on land that was previously part of the old Racecourse), including gardens, open parkland, and new non-vehicular drive upon the historic approach to the Castle, areas of play and formal/informal recreation.</p>	<p>The visual amenity of: users of the PRoW HE227 and HE275; and users of Westenhangar Castle.</p>
		<p>The conservation of the character of Stone Street as an intimate lane and the individual identity of the settlement of Westenhangar along it (with the more isolated dwellings of Tollgate Cottage, Twin Chimneys and Little Greys) with new 10m wide native tree belt planting (1I, 4L & 4M).</p>	<p>The visual amenity of: users of the PRoW HE221A and HE281; and users and residents of Westenhangar.</p>
<p>14. Hillhurst Open Farmland</p>	<p>Proposed Land-use: informal recreation; housing, main business centre, business premises. Building Height Range (above existing ground levels):12-15m. Proposed additional Built Infrastructure: primary access roads. upgrading, part-re-</p>	<p>Focus the employment zone close to the existing infrastructure of the railway station, town centre and the A20/M20 junction. Retain and integrate the retained Hillhurst Farm buildings within an open space with new building positively fronting on to it. Ensure sensitive treatment of the area's edges adjoining existing communities</p>	<p>The visual amenity of: users of PRoW HE281 and HE221A within the site; the residents and users of Westenhangar (including the properties of Little Greys and Twin Chimneys), Stanford; users of localised/close range PRoW within 2km to the north and east of the site; users of intermediate/medium range PRoW between 2-5km to the north of the site; users of the NDW-NT; users of Open Access Land upon the North Downs scarp slopes within medium and long range; users of roads within the site i.e.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
	<p>alignment, and potential future dualling of the A20 between junction 11 of the M20 and Newingreen. New controlled vehicular junctions off of the A20 between the A20 between junction 11 of the M20 and Newingreen.</p> <p>Proposed Green Infrastructure: informal open space, village green and new green-lane parallel with the line of the A20. Riparian habitat, woodland blocks, shaws, tree belts, hedgerows, street trees.</p>	<p>Reinforcement of the area's boundaries, and integration of the proposed Development's built form in views from the AONB, with the creation of new tree belts.</p> <p>The proposed upgrading, part-realignment and potential dualling of the A20 Ashford Road note dualling between junction 11 of the M20 and Newingreen, and the earthworks associated with these would be mitigated by:</p> <ul style="list-style-type: none"> - minimizing the amount of new road that would be 'off-line' from its current alignment, so to reduce the quantity of visible highway design-associated earthworks (i.e. steep cuttings and embankments); - retaining the majority of the existing tree belt that lies on the west side of the current road near to Little Greys; - bolstering this with additional 10m wide native tree belt planting (4J) immediately to the south west between the new alignment and the boundary with the AONB / Sandling Park; - further 10m wide native tree belt planting (4J) around the boundary of the current roundabout in the far north-east corner of the site and the adjacent AONB; - gapping up the current hedgerow between the roundabout and Kiln Wood on the east side of the current road with new hedge species and 10m wide tree planting (4J); 	<p>Stone Street and A20 Ashford Road; and users of roads 0-2km of the site i.e. Kennett Lane; and Users of Junction 11 of the M20 and the adjacent Service Station</p> <hr/> <p>The landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 06, 07, 08 and 12; and ABC-AONB-01, 02 and 03.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>- new native hedge planting between the A261 at the Newingreen junction and Kiln Wood; creating a vegetated median within any potential dual carriageway, planted with native tree and understorey species;</p> <p>- 10m wide planting tree belt (4N & 4O) along the north-western side of the road between it and the nearest area of proposed built development.</p> <p>These would assist in visually integrating the works into their setting, and reinforcing the defensible edge to the eastern side of the proposed Development.</p>	
		<p>The proposed upgrading, part-realignment and potential dualling of the A20 Ashford Road note dualling between junction 11 of the M20 and Newingreen, and the earthworks associated with these would be mitigated by:</p> <p>- minimizing the amount of new road that would be 'off-line' from its current alignment, so to reduce the quantity of visible highway design-associated earthworks (i.e. steep cuttings and embankments);</p> <p>- retaining the majority of the existing tree belt that lies on the west side of the current road near to Little Greys;</p> <p>- bolstering this with additional native tree belt planting (4J) immediately to the south west between the new alignment and the boundary with the AONB / Sandling Park;</p>	<p>The visual amenity of: users of PRow HE281 and users of localised/close range PRow within 2km to the east of the site.</p> <p>The landscape character of LCA SDC-12.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>- further native tree belt planting (4J) around the boundary of the current roundabout in the far north-east corner of the site and the adjacent AONB;</p> <p>- gapping up the current hedgerow between the roundabout and Kiln Wood on the east side of the current road with new hedge species and tree planting (4J);</p> <p>- new native hedge planting (4J) between the A261 at the Newingreen junction and Kiln Wood; creating a vegetated median within any potential dual carriageway, planted with native tree and understorey species;</p> <p>- planting tree belt (4N & 4O) along the north-western side of the road between it and the nearest area of proposed built development.</p> <p>These would assist in visually integrating the works into their setting, and reinforcing the defensible edge to the eastern side of the proposed Development.</p>	
		<p>The placement of the proposed tallest development blocks within this site-specific LCA away from its edges with the existing residential areas of Stone Street and the AONB to assist in visually integrating this part of the proposed Development into its setting.</p>	<p>The visual amenity of: the residents and users of Westenhanger (including the properties of Little Greys and Twin Chimneys).</p>
		<p>Placement of the main area of business premises along the northern edge of the site adjacent to the railway line, junction 11 of the M20 and the</p>	<p>The visual amenity of: users of PRoW HE281, users of localised/close range PRoW within 2km to the north of the site; users of the NDW-NT; users of</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>motorway service station to assist in visually integrating this part of the proposed Development into its setting.</p>	<p>intermediate/medium range PRow, between 2-5km to the north of the site; users of Open Access Land upon the North Downs scarp slopes within medium range; and residents and users of Westenhanger.</p>
		<p>Creation of tree lined (4K) village green at the southerly most section of this site-specific LCA to assist in the conservation of the views towards the North Downs escarpment from PRow HE313 within adjacent site Specific LCA no.20, and from Hythe Road.</p>	<p>The visual amenity of: users of localised/close range PRow within 2km to the west of the site; and users of roads within 0-2km of the site including Hythe Road. The landscape character of LCA: SDC-12.</p>
		<p>The creation of appropriate separation distances between those dwellings along Stone Street (i.e. Little Greys, Twin Chimneys and Tollgate Cottage) within or adjacent to the application boundary, which are reasonably assumed to be retained and occupied in the same way as they are currently throughout the entirety of the construction period, and any proposed built form, including consideration in particular of the gap between the habitable rooms of existing and new buildings (particularly where such dwellings differ in their number of storeys or in their finished floor levels). Plus, the use of existing mature structural vegetation or planting of new structural vegetation immediately beyond the boundary these properties' curtilages and access drives where they adjoin areas of proposed built form and/or infrastructure. The design of new built form must also respect the scale of such residential buildings in terms of their heights and character to</p>	<p>The visual amenity of the residential receptors in the existing scattered dwellings along Stone Street that are reasonably assumed to be retained and occupied in the same way as they are currently throughout the entirety of the construction period.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>avoid unacceptable overbearing and dominating visual effects upon occupiers of existing dwellings.</p> <p>The majority of the existing mature trees around the existing Hillhurst Farm buildings would be retained and 10-30m wide native tree belts would be planted along the northern (4A) and eastern boundaries (4I, 4J, 4N, 4O) of the site along the edge with the settlement of Westenhanger (4I & 4M), and through the centre of areas new built development (4B, 4C, 4D, 4E, 4F, 4G & 4H) within this site-specific LCA.</p>	<p>To assist in: visually integrating the proposed Development into its setting; restoring a stronger landscape pattern throughout the LCA; conserving the individual identity of Westenhanger; and reinforcing the existing defensible edge created by the railway to the north and Kiln Wood and Sandling Park to the east so helping mitigate the effect of the Development upon the visual amenity of: users of PRoW HE281 and HE221A within the site; the residents and users of Westenhanger (including the properties of Little Greys and Twin Chimneys), Stanford; users of localised/close range PRoW within 2km to the north and east of the site; users of intermediate/medium range PRoW between 2-5km to the north of the site; users of the NDW-NT; users of Open Access Land upon the North Downs scarp slopes within medium and long range; users of roads within the site i.e. Stone Street and A20 Ashford Road; and users of roads 0-2km north of the site i.e. Kennett Lane; and Users of Junction 11 of the M20 and the adjacent Service Station. And upon the landscape character of LCA SDC-11 and adjoining LCAs: SDC-05, 06, 07, 08 and 12; and ABC-AONB-01, 02 and 03.</p>
<p>15. A20 Scattered Settlement</p>	<p>Proposed Land-use: housing, education. Building Height Range (above existing ground levels): 12-18m.</p>	<p>Creation of space for tree planting (1K & 5F) along the A20 in order to assist in: visually integrating adjacent development blocks into their setting and creating an improved cohesion to the landscape along the length the road.</p>	<p>The visual amenity of: users of PRoW HE275; users of the NDW-NT; users of intermediate/medium range PRoW, between 2-5km to the north of the site; users of Open Access Land upon the North Downs scarp slopes within medium range; residents along the A20;</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
	<p>Proposed additional Built Infrastructure: primary access roads, including re-routing of the A20. The main high street for the town.</p> <p>Proposed Green Infrastructure: informal and formal open space, town park between Westenhanger Castle and the A20 Ashford Road, school playing fields, areas of equipped and natural play. Tree belts, hedgerows, street trees.</p>	<p>The creation of proposed wide openings between areas of proposed development blocks, including: the proposed non-vehicular drive along the historic approach to Westenhanger Castle; the public open space along the tributary to the East Stour River; and the open space leading to the site of the Roman Villa and geological SSSI to help reinforce the visual links from the road to the surrounding landscape and allowing views to Westenhanger Castle and the North Downs escarpment.</p> <p>The creation of appropriate separation distances between those dwellings (i.e. the scattered houses along the A20 and at the edge of Newingreen) within or adjacent to the application boundary, which are reasonably assumed to be retained and occupied in the same way as they are currently throughout the entirety of the construction period, and any proposed built form, including consideration in particular of the gap between the habitable rooms of existing and new buildings (particularly where such dwellings differ in their number of storeys or in their finished floor levels). Plus, the use of existing mature structural vegetation or planting of new structural vegetation immediately beyond the boundary these properties' curtilages and access drives where they adjoin areas of proposed built form and/or infrastructure. The design of new built form must also respect the scale of such residential</p>	<p>residents and users of Newingreen; users of the A20 Ashford Road.</p> <p>The visual amenity of: users of PRow HE275; and users of the A20 Ashford Road</p> <p>The visual amenity of the residential receptors in the existing scattered dwellings either side of the A20 that may be retained and occupied in the same way as they are currently throughout the entirety of the construction period.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>buildings in terms of their heights and character to avoid unacceptable overbearing and dominating visual effects upon occupiers of existing dwellings.</p>	
<p>16. Newingreen Linear Settlement</p>	<p>Proposed Land-use: n/a. Building Height Range: n/a. Proposed additional Built Infrastructure: n/a. Proposed Green Infrastructure: areas of structural planting, allotment and parkland within adjacent LCAs.</p>	<p>A proposed open space, woodland blocks and tree belt buffer (1M & 2E) would be created between the southern edge of Newingreen and the nearest areas of proposed housing to assist in visually integrating the proposed Development into its setting and protecting the individual identity of the settlement and its rural setting.</p>	<p>The visual amenity of: the residents and users of Newingreen; users of PRoW HE314 within the site; users of localised/close range PRoW, within 2km to the east of the site; and users of roads within 0-2km of the site, i.e. Stone Street.</p>
<p>17. Lypnpe Settlement Core</p>	<p>Proposed Land-use: n/a. Building Height Range: n/a. Proposed additional Built Infrastructure: n/a. Proposed Green Infrastructure: areas of structural planting, allotment and parkland within adjacent LCAs.</p>	<p>A proposed 75-175m minimum wide public open space, woodland block (8B, 8C, 8D & 8E), and tree belt (6R & 8G) buffer would be created within the adjoining site-specific LCA between the edge of the built-up area of Lypnpe and the nearest areas of proposed housing to assist in visually integrating the proposed Development into its setting, protecting individual identity of the village and its rural setting.</p>	<p>The visual amenity of the residents and users of Lypnpe. The landscape character of LCA: SDC-11.</p>
<p>18. Sandling Park Open Farmlands</p>	<p>Proposed Land-use: n/a. Building Height Range: n/a. Proposed additional Built Infrastructure: n/a.</p>	<p>The proposed upgrading, part-realignment and potential dualling of the A20 Ashford Road note dualling between junction 11 of the M20 and Newingreen, and the earthworks associated with these would be mitigated by:</p>	<p>The visual amenity of: users of localised/close range PRoW within 2km to the east of the site. The landscape character of LCA SDC-12.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
	<p>Proposed Green Infrastructure: areas of structural planting within adjacent LCAs.</p>	<ul style="list-style-type: none"> - minimizing the amount of new road that would be 'off-line' from its current alignment, so to reduce the quantity of visible highway design-associated earthworks (i.e. steep cuttings and embankments); - retaining the majority of the existing tree belt that lies on the west side of the current road near to Little Greys; - bolstering this with additional native tree belt planting (4J) immediately to the south west between the new alignment and the boundary with the AONB / Sandling Park; - further native tree belt planting (4J) around the boundary of the current roundabout in the far north-east corner of the site and the adjacent AONB; - gapping up the current hedgerow between the roundabout and Kiln Wood on the east side of the current road with new hedge species and tree planting (4J); - new native hedge planting (4J) between the A261 at the Newingreen junction and Kiln Wood; creating a vegetated median within any potential dual carriageway, planted with native tree and understorey species; - planting tree belt (4N & 4O) along the north-western side of the road between it and the nearest area of proposed built development. <p>These would assist in visually integrating the works into their setting, and reinforcing the defensible</p>	

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>edge to the eastern side of the proposed Development.</p>	
<p>19. Sandling Wooded Parkland</p>	<p>Proposed Land-use: n/a. Building Height Range: n/a. Proposed additional Built Infrastructure: n/a. Proposed Green Infrastructure: areas of structural planting, within adjacent LCAs.</p>	<p>The proposed upgrading, part-realignment and potential dualling of the A20 Ashford Road note dualling between junction 11 of the M20 and Newingreen, and the earthworks associated with these would be mitigated by:</p> <ul style="list-style-type: none"> - minimizing the amount of new road that would be 'off-line' from its current alignment, so to reduce the quantity of visible highway design-associated earthworks (i.e. steep cuttings and embankments); - retaining the majority of the existing tree belt that lies on the west side of the current road near to Little Greys; - bolstering this with additional native tree belt planting (4J) immediately to the south west between the new alignment and the boundary with the AONB / Sandling Park; - further native tree belt planting (4J) around the boundary of the current roundabout in the far north-east corner of the site and the adjacent AONB; - gapping up the current hedgerow between the roundabout and Kiln Wood on the east side of the current road with new hedge species and tree planting (4J); - new native hedge planting (4J) between the A261 at the Newingreen junction and Kiln Wood; creating a vegetated median within any potential dual 	<p>The visual amenity of: users of localised/close range PRoW within 2km to the east of the site.</p> <p>The landscape character of LCA SDC-12.</p>

<p>Otterpool Park Site Specific LCA (see ES Appendix 12.1)</p>	<p>Summary of Development Proposals within the Site Specific LCA As outlined in the SDP, OP-DS and Parameter Plans, and which are supported by the GI-Strategy</p>	<p>Embedded Design Measures associated with the LCA (1A = structural planting units shown on LVIA Figure 12.77 and GI-Strategy Figure 106, and listed in the section 6.5 of the GI-Strategy)</p>	<p>Receptor(s) upon which the significance of the effect would be reduced (or upon which a significant effect would be avoided or prevented, if indicated) by inclusion of the embedded design and mitigation measure</p>
		<p>carriageway, planted with native tree and understorey species;</p> <p>- planting tree belt (4N & 4O) along the north-western side of the road between it and the nearest area of proposed built development.</p> <p>These would assist in visually integrating the works into their setting, and reinforcing the defensible edge to the eastern side of the proposed Development.</p>	
<p>20. Berwick Enclosed Farmland</p>	<p>Proposed Land-use: n/a. Building Height Range: n/a. Proposed additional Built Infrastructure: n/a. Proposed Green Infrastructure: areas of structural planting, within adjacent LCAs.</p>	<p>Creation of a tree lined (4K) village green at the southerly most section of adjacent site-specific LCA no.14 to assist in the conservation of the views towards the North Downs escarpment from PRoW HE313 and from Hythe Road.</p> <p>A proposed public open space would be created between the southern edge of Newingreen and the nearest areas of proposed housing to assist in visually integrating the proposed Development into its setting, reinforcing the existing defensible edge created by the Stone Street to the east, and protecting the individual identity of the settlement (as well as that of Lympne) and its rural setting. New orchard planting (6Q), hedgerow (2G & 6P), and 10-15m wide tree belts (2E & 6R) would be used to reinforce the landscape structure in this area.</p>	<p>The visual amenity of: users of localised/close range PRoW within 2km to the west of the site; and users of roads within 0-2km of the site, i.e. Hythe Road.</p> <p>The landscape character of LCA: SDC-12.</p> <p>The visual amenity of: the residents and users of Stone Street (including Berwick House); users of PRoW; users of localised/close range PRoW, within 2km to the east of the site; and users of roads within 0-2km of the site i.e. Stone Street.</p> <p>The landscape character of LCA: SDC-12</p>

Additional Mitigation

12.4.116 An iterative appraisal of the proposed Development, taking into account the embedded design measures and good practice, was undertaken to identify any potentially significant effects that would require additional mitigation. Effects on landscape and visual amenity receptors that could be significant and for which additional mitigation is possible are as follows:

- Impacts upon the visual amenity of residential receptors in dwellings inside of the site.
- Impacts upon the landscape character of the site and its surrounds and visual amenity of the other identified receptors.

Construction

12.4.117 The LVIA considers the impacts on the visual amenity of residential receptors in dwellings inside of the site resulting from construction of the proposed Development. This takes into account the assumed types of construction activities involved, the geographic scale, extent and duration of activities and their proximity to receptors. When assigning magnitude to the impacts identified, in accordance with Table 12-10 and Table 12-13 the following site-wide additional mitigation measures have been assumed to be in place:

- The planning implementation, management and maintenance of further advance structural planting proposals specific to the reduction in adverse visual amenity impact upon the residential receptors in those dwellings that are assumed to be retained (the proposals would be prepared in planning Tier 2 and Tier 3 in accordance with the general and planting-type design principles set out in section 5.5 and 6.4 of the GI-Strategy, and would be secured by planning condition).

Operation

12.4.118 The LVIA considers the impacts on the visual amenity resulting from construction of the proposed Development to residential receptors in dwellings inside of the site, and on the landscape character of the site and its surrounds and visual amenity of the other identified receptors. This takes into account the assumed types of construction activities involved, the geographic scale, extent and duration of activities and their proximity to receptors. When assigning magnitude to the impacts identified, in accordance with Table 12-10 and Table 12-13 the following site-wide additional mitigation measures have been assumed to be in place:

- The planning, implementation, management and maintenance of further advance structural planting proposals specific to the reduction in adverse visual amenity impact upon the residential receptors in those dwellings that are assumed to be retained (the proposals would be prepared in planning Tier 2 and Tier 3 in accordance with the general and planting-type design principles set out in section 5.5 and 6.4 of the GI-Strategy, and would be secured by planning condition).
- The planning, implementation, management and maintenance of further phase/parcel-specific structural planting (such as the of planting of currently unplanned open spaces and along currently unplanned secondary and tertiary roads) would be prepared in planning Tier 2 and Tier 3 in accordance with the general and planting-type design principles set out in section 5.5 and 6.4 of the GI-Strategy, and would be secured by planning condition, to further reduce impacts upon the landscape character of the site and its surrounds and visual amenity of the identified receptors.

12.5 Assessment of Residual and Cumulative Effects

- 12.5.1 The following section sets out the residual effects following the implementation of the embedded measures and additional mitigation set out above.
- 12.5.2 It must be read in conjunction with the detailed assessment tables for each receptor contained in ES Appendix 12.2. These tables show the detailed assessment of each receptors sensitivity and the magnitude of change and significance of effect upon them at each assessment scenario, first for non-cumulative and then for cumulative effects.

Landscape Character Receptors

- 12.5.3 The detailed assessment tables set out in ES Appendix 12.2 have considered the effect and significance of changes on the landscape character of those receptors identified in Section 12.3 of this assessment as having the potential to experience significant landscape effects arising from the proposed Development.
- 12.5.4 The receptors identified and used within this assessment are the key characteristics, components, perceptual and aesthetic qualities, and overall character of the LCAs set out in the SDC-HLLA and ABC LC-SPD, supplemented by appreciation of other published landscape character assessments, the site-specific landscape character assessment, and our other fieldwork and desktop studies.

Landscape Character of the Site

- 12.5.5 The landscape character of the site (covered by LCA SDC-HLLA no.11, as shown on Figure12.07) is likely to experience adverse effects arising from the proposed Development. There would be a fundamental long-term and largely irreversible change to the make-up and balance of most of the receptor's key landscape characteristics and perceptual and aesthetic qualities across much of its geographic area. The proposed Development would introduce a largely urban townscape character upon an area of chiefly current agricultural and open landscape character.
- 12.5.6 Over time the significance of effects would reduce as the substantial green infrastructure proposals that form part of the embedded design and mitigation scheme establish and mature and form new positive attributes to the area's landscape and townscape character. These include:
- the restoration of a richer and more appropriately diverse landscape character to the corridors of the East Stour River and its tributaries;
 - the creation of more appropriate landscape character settings to key areas of heritage and geological value such as Westenhanger Castle and the Otterpool Quarry SSSI; and
 - the creation of an expansive network of accessible open space comprising woodland, riverside meadow, informal and formal recreation, traffic-free greenways and parkland.
- 12.5.7 In addition, and in line with recommendations made within the KCC-LAK for those of its LCAs that cover the site, the proposed Development would:
- restore a frequency of woodland on the lower slopes of the greensand ridge;
 - create a new, stronger structural landscape framework of woodland, wet woodland, copses, shaws, tree belts, and hedgerows;
 - create landscape features to define linear settlements and transport corridors, and control visual detractors – such as Lympne Industrial Estate.

- 12.5.8 Acknowledging the substantial change to the character of the site that would be inevitable with a development of this nature, the proposals have also included the creation of new, or where required the reinforcement of existing robust defensible boundaries along the edges of the proposed Development. These will assist in mitigating the sharp contrast in character with adjoining areas that may otherwise occur without them, and assist in defining a visually appreciable frame and limit to the settlement. Many of these would be planted near the outset of the proposed Development's overall construction and in advance of the construction of some of those areas of new built-form that they are intended to mitigate.
- 12.5.9 These defensible edges take the form of:
- the creation of substantial blocks of new native woodland belt planting around edges of the site (that are not however simply linear belts, but vary in width to replicate the existing landscape pattern of shaws, copses, field corner clumps, and shelter belts);
 - the reinforcement of existing defensible edges such as the Ashford-Folkestone railway line, the A20, and the wooded edge of Sandling Park with new native structural planting
 - separation from key areas of sensitivity such as existing settlements, the crest of the greensand ridge and Harringe Brooks Wood.
- 12.5.10 Despite the mitigating factors listed above, the overall magnitude of change upon this receptor of 'moderate/high sensitivity' would be 'adverse' and 'large' at AS1 and AS2, reducing only to 'moderate' at AS2 and AS3. The effect on the landscape character of this receptor would be 'moderate/major' at AS1 and AS2, reducing, to 'moderate' at AS3 and AS4. On account of the factors described above and in ES Appendix 12.2 the fundamental shift in much the LCA's existing key landscape components, characteristics, and perceptual and aesthetic qualities is considered be '**significant**' and **adverse** for all assessment scenarios.

Landscape Character outside of the Site

Those parts of LCA SDC-11: Lympne that are outside of the Application Site Boundary

- 12.5.11 The parts of the LCA SDC-11 that lie outside of the application site boundary comprise the agricultural land between its western edge and F&HDC's boundary with ABC, and the existing settlements of Lympne, Newingreen, Westenhanger and Barrow Hill.
- 12.5.12 On account of:
- there being no new built form being proposed in these settlements and in this agricultural land;
 - the strong degree of enclosure afforded to them by the existing structural vegetation (such as the layers of existing domestic garden trees, hedgerows and shrubs, Harringe Brookes Wood, and the tall field hedgerows along Harringe Lane);
 - the proposed separation distances between new built development and the existing settlements;
 - the predominant 'inward-facing' character of these settlements (i.e. facing onto the roads that they have developed along);

- the significant quantity, type and location of accessible open space being planned within the proposed Development which would substantively mitigate potential change on those existing publicly accessible areas in this LCA; and
 - the proposed Development's embedded design measures (i.e. the proposed structural planting around the edge of, and throughout the proposed Development and the lowering of building density and height at the proposed Development's edge),
- 12.5.13 the large degree of landscape character change felt within the site would diminish very quickly beyond its boundaries.
- 12.5.14 Whilst there would be harm experienced on account of:
- visible increase in built form, movement (particularly during construction) and lighting, and
 - some diminishment in some of the views to the North Downs escarpment,
 - resulting from the proposed Development, the LCA's identified characteristics (set out in Table 12-18) would remain predominantly unaffected and the areas' integral rural and village settlement character would be maintained.
- 12.5.15 As such it is anticipated that at AS1 and AS2, as the planned embedded design measures establish, there would be a **'moderate' adverse** significance of landscape character effect on these areas. It is considered that this landscape character effect would not be **'not significant'** and as the overall essential and underlying make-up and balance of the LCA's character would be conserved. The significance of effect would reduce to **'moderate/minor'** (also **'not significant'**) in AS3 and AS4 as the proposed mitigation becomes established.

Adjoining Landscape Character Receptors

- 12.5.16 These receptors are LCAs: SDC-06: Stanford, SDC-09: Sellindge, SDC-12: Brockhill, SDC-13: Greensand Ridge, and ABC-10: East Stour Valley.
- 12.5.17 The detailed character impact assessment set out in ES Appendix 12.2 determines that very few of the characteristics of these LCAs would be susceptible to potential undue negative consequences arising from the proposed Development, and as such most receptors are considered generally resilient to change brought about by the proposed Development.
- 12.5.18 The kind of characteristics of the LCAs that would be effected were found to be those of 'open views' in the direction of the site and the 'general tranquil perceptual quality' that some of these LCAs display. It was identified that the visible increase in built form, movement (particularly during construction) and lighting resulting from the proposed Development would have an adverse effect upon these characteristics.
- 12.5.19 The detailed character impact assessment considered, however, that on account of the:
- proposed retention and reinforcement of existing strong defensible edges top the site, and the creation of new ones where these do not already exist (both of which would be largely implemented early on in the construction period of the proposed Development).
 - adjoining LCAs having an equivalent landform and topography to that containing the site,
 - greater frequency of woodlands, tree belts and hedgerows throughout the adjoining LCAs, and

- mitigation related structural planting
- 12.5.20 that the large degree of landscape character change felt within the site would diminish very quickly beyond its boundaries and as such the magnitude of change to the landscape character receptors adjoining the site boundary would be at worst ‘moderate/small’ at AS1, reducing to ‘small’ at AS2 and generally ‘very small’ at AS3 and AS4.
- 12.5.21 On account of the sensitivity of these landscape character receptors the significance of effect was considered to be generally at worst ‘**moderate/minor**’ and **adverse** at AS1 and AS2, reducing to ‘**minor/moderate**’ and **adverse** at AS3 and AS4. The effect on the landscape character of these receptors would therefore be ‘**not significant**’ for all assessment scenarios. The ‘**moderate**’ **adverse** effect upon the SDC-06 Stanford LCA at AS1 was also considered ‘**not significant**’ because most of the area’s components, characteristics, and perceptual and aesthetic qualities that shape its moderate sensitivity remain unchanged and the area’s integral rural character would be maintained.

Other Landscape Character Receptors

- 12.5.22 The effects of the proposed Development upon the landscape character receptors away from the boundary of the site, and the LCAs containing it, have also been assessed. These receptors are: SDC-05: Postling Vale, SDC-07: Tolsford Hill, SDC-08: North Downs Ridge, SDC-21: Romney Marsh Proper Farmlands, ABC-25: Aldington Ridgeline, ABC-29: Brabourne Lees Hilly Farmlands, ABC-30: Brabourne Arable Farmlands, ABC-31: Brabourne Farmlands, ABC-AONB-01 Postling Vale – Stowting, ABC-AONB-02 East Kent Downs – Petham, ABC-AONB-03 Lympne – Aldington, ABC-AONB-04 Lympne - Hythe Escarpment, ABC-AONB-05 Lympne - Romney Marsh, and ABC-AONB-06 Stour Valley – Hampton.
- 12.5.23 The detailed character impact assessment set out in ES Appendix 12.2 shows that only a few of the key characteristics and perceptual and aesthetic qualities of the LCAs within this part of study area that were considered to be susceptible to significant effects arising from the proposed Development, are likely to be impacted upon. These include: the far-reaching panoramic views out from, or back to the escarpments of the North Downs and the greensand ridge; the sense of remoteness, tranquillity and of a wild rugged landscape; and the strong rural nature of many of these LCAs.

Far-Reaching Panoramic Views

- 12.5.24 The detailed assessment concluded that the proposed Development would become a component in the far-reaching panoramic views from the North Downs.
- 12.5.25 It was found, however, that in most views the proposed Development is only likely to constitute a horizontally narrow part given intervening landform, vegetation and buildings, and the distances the location of such views are from the site. In addition, the unaffected wooded greensand ridge, the promontory of Romney Marsh and Dungeness (with its power station and windfarm on the horizon), the High Weald, and the English Channel would remain visibly evident above the proposed Development, in such views. And below the site the unaffected broad expanse of the scarp foot-slopes and Vale of Holmesdale would also remain visibly evident.
- 12.5.26 Likewise, in most views from these LCAs the proposed Development would only constitute a modest section of the broad panoramas that are experienced. The current panoramic views generally stretch not only to the escarpment of the North Downs in either direction, but in the case of some views (such as from Tolsford Hill) back into the dip-slope of the landform as well.

- 12.5.27 The current views were found to already contain other elements of built-form. Some of which are similar in nature to the proposed Development, and others of a clear detracting form (such as the Channel Tunnel terminal and the Lympne Industrial Estate) - on account of the incongruous scale of their individual components and the lack of sensitivity displayed in their siting, materials and colour.
- 12.5.28 By contrast, the appearance of settlement (when controlled, planned, designed, implemented and managed, or allowed to evolve sensitively) in such views is a factor that contributes to the attractiveness of them. An opinion shared by Section 2 the AONB-SPS (see the extract contained within paragraph 12.2.86 of this assessment) and by the AONB-MP(2014-2019) (see the extract contained within paragraph 12.3.113 of this assessment) which recognise settlement and towns as one of the constituents (along with open countryside, estuaries, and the sea) of views from the scarp.
- 12.5.29 The detailed assessment found that the proposed new settlement would not only be apparent in such views, but it would also, importantly, be legible as a town as well. The proposed siting of the town centre at the lowest point of the Vale of Holmesdale and near to other areas of existing activity (i.e. junction 11 of the M20, the railway station and service station), and the clear arrangement of sub-centres in other visually defined locations (such as upon Barrow Hill) would aid people's ability to 'read', understand, compute and subconsciously accept the settlement in the broad panoramic views from these LCAs.
- 12.5.30 The assessment also found that proposed belts of native structural vegetation, which would be equally visually apparent in such views by AS2, AS3 and AS4 would not only reduce the amount of built-form visible, but they too would help in 'reading' and accepting the settlement. Their substantive nature would create a strong visual framework, based upon the current and historic field patterns of the area, within which parts of the town would visually appear to nestle. In such panoramic views they would also help to visually create clearly understood constraints/defensible edges around the edge of the settlement.
- 12.5.31 Whilst it is accepted that individual elements of the town (such as the larger of the community and commercial buildings) would be visible from some of the panoramic views within these LCAs, from views over 5.0km such detail is far more difficult to distinguish.
- 12.5.32 As such it is considered that this small scale of change to the valued characteristic of far-reaching panoramic views would not alter its fundamental nature, and that it would only be felt across a moderately small proportion of the LCAs it helps characterise. In addition, whilst the change would be mostly permanent and irreversible it would be felt less keenly with time as the proposed structural planting establishes.

Sense of Remoteness and Tranquillity

- 12.5.33 With regards to the characteristic of remoteness and tranquillity within these LCAs - the detailed assessment, set out in ES Appendix 12.2, shows that there would be a diminishment in the degree of these as a result of the proposed Development (particularly during the construction period when the aspect of movement combines with those of built-form and lighting).
- 12.5.34 The scale of change however would be small, and as such would not be so extensive as to cause the loss of these characteristics from these LCAs - given: the broadness of panoramas (of which the proposed Development would only be a part of); the distance from the LCAs to the proposed Development and the strength of the quieter, unhurried nature of the land in between then; and the fact that the aspects of contrast,

openness, natural beauty, and landform would remain strong parts of the perceptual and aesthetic qualities of these LCAs.

Conclusion

- 12.5.35 The assessment has identified that the LCAs away from the edge of the site are sufficiently robust in terms of strength of character to accept the proposed Development. Whilst it has been identified that there are likely to be adverse impacts upon two of the characteristic and perceptual and aesthetic qualities of these receptors as a result of the proposed Development, it has been determined that the fundamental integrity of each, and the role they play in helping to define the character of such LCAs would not alter.
- 12.5.36 Therefore, on account of the sensitivity of these landscape character receptors the significance of effect was considered to be generally at worst '**moderate/minor**' and **adverse** through all assessment scenarios – therefore '**not significant**'. For most receptors the significance of effect reduced to '**minor/moderate**' by AS2, AS3 and AS4. As such the effects on the LCAs away from the boundary of the site arising from the proposed Development are considered '**not significant**'.

Visual Amenity Impact Assessment

Public Rights of Way through the Site

- 12.5.37 The detailed visual amenity impact assessment set out in ES Appendix 12.2 shows that users of the PRow within the site (as shown on Figure 12-3) are likely to experience adverse effects resulting from the proposed Development.
- 12.5.38 The construction and operation of the proposed Development is likely to bring about substantial changes to the visual experience of those using these footpaths and bridleways by virtue of them visually being aware of a greater deal of built form, construction activity, lighting and the paraphernalia of settlement at close range than they are current used to. Such elements would also hinder some of the existing longer views out from the site to the surrounding landscape – notably views to the escarpment of the North Downs.
- 12.5.39 Given that not all routes are likely to be affected at **AS1** (as it is unlikely that construction would occur in all parts of the site at once) the significance of effect is considered to be '**moderate**' **adverse**. The effects is, however, considered to be a '**significant**' effect on account of the fundamental change that that would be brought about to the users of those PRow impacted by the proposed Development during this period.
- 12.5.40 At Development completion (**AS2**) it is considered that the Development would alter the overall balance and make-up of the visual experience of all PRow within the site, and therefore the effect is considered '**moderate/major**' **adverse** and therefore '**significant**'.
- 12.5.41 As the areas of the proposed Development's embedded green infrastructure design and mitigation measures continue becoming established at AS3 and AS4 the previous impacts would have reduced and the visual experience for users would be one of new landscape of public open spaces, naturalised areas and woodland. At **AS3** a residual '**moderate**' **adverse** effect would occur, which is considered '**significant**'. At **AS4** residual '**moderate**' **adverse** effect would occur, but one that is subsequently not wholly adverse, and so is considered '**not significant**'.

Public Rights of Way Outside of the Site

12.5.42 The detailed visual amenity impact assessment set out in ES Appendix 12.2 shows that there would be adverse effects to the visual amenity of users of PRowS on all sides of the site.

Users of localised/close range PRow, within 2km to the south of the Site

12.5.43 To the south, however the protection afforded by the dense wooded areas, tree belts, hedgerows, existing buildings and landform on the crest of the Hythe Escarpment prevents direct views to the site by users of these PRow (e.g. HE318, HE317 and HE 322). Consequently there is very little inter-visibility between these and the site.

12.5.44 The assessment has found that whilst there may be a perception of increased lighting at night by users of the PRowS in this area (as shown on Figure 12-3) there would be a negligible magnitude of change on account of the existing areas of lighting that already exists (i.e. the Lympne Industrial Estate, Lympne village and the Port Lympne Animal Park). In addition, the substantial embedded design measures included within the proposed Development (i.e. the separation of any proposed buildings from the site's southern boundary by a minimum of approximately 75m, the planting of a 15m wide native tree belt within this gap, and the placement of the proposed tallest development blocks away from the crest of the greensand ridge) would ensure that such adverse impacts are generally small in nature.

12.5.45 On balance the adverse effect on users of the localised/close range PRow, within 2km to the south of the site (as shown on Figure 12-3) is considered '**minor**' **adverse** at **AS1** as only a very small proportion of the overall construction activity is likely to be perceived. The effect would be '**minor/moderate**' **adverse** at **AS2** as the Development is fully built but the structural planting is not fully established, and '**minor**' **adverse** at **AS3** and **AS4** as the mitigation matures. At all assessment scenarios the effect is considered '**not significant**'.

Users of localised/close range PRow, within 2km to the west of the Site

12.5.46 Within the localised area (2km) to the west of the site the existing density of woodland blocks (such as Harringe Brookes Wood, Burch's Rough and Round Wood), the tall hedgerows (such as those along Harringe Lane), and undulating landform also limits the intervisibility between the PRow here (numbers HE302, HE325, AE459 and AE316, as shown on Figure 12-3) and the site.

12.5.47 The detailed assessment in ES Appendix 12.2 identified that when taking into account these existing factors, only users of a few PRow in this area have the potential to experience significant effects. These users would have sight of both construction and operational activity but would generally view the proposed Development at an oblique angle, and as part of wider panoramas. Users of other paths would experience indirect impacts from a discernment of slightly greater ambient light at night.

12.5.48 The construction-related mitigation measures (set out in section 12.4), the substantial structural planting proposed for the western boundary of the site (so creating a visibly robust defensible edge to it), the placement of the tallest buildings away from this boundary, the use of minimal lighting and adherence to the ILP-GNROL, with regards to light spill, glare and sky glow, and the planting structural native tree belts between the development blocks and throughout the 'Hilltop' and 'Woodland Ridges' character areas, closest to this edge would combine to diminish the visual impact of proposed built-form and its lighting upon users of these PRowS. The creation of the nearest local centre to this edge (near Barrow Hill) would help convey the visual legibility of

the new settlement as a town, and not ‘sprawl’, in the residual views from these PRowWs to the site. In addition, views to North Downs escarpment, experienced by users of PRow HE302 and HE325 (see Viewpoint 14 on Figure 12.26 and 12.27) would not be prevented by the proposed Development or its planting.

- 12.5.49 The assessment considered therefore that, overall, the effect on users of localised/close range PRow, within 2km to the west of the site would be **adverse**, but **‘not significant’** during any assessment scenario. The effect during construction (**AS1**) would be **‘moderate/minor’ adverse** given the temporary and reversible nature of these effects. The significance of effect would increase to **‘moderate’ adverse** at **AS2** as the Development would be fully built but the structural planting would not be fully established. Whilst the proposed Development would be distinct, it would not be the defining element in the visual experience of users of these PRowWs and so would not markedly change the overall balance and make-up of this, and therefore is considered **‘not significant’** at **AS2**. The extent and scale of the proposed Development in views from these PRowWs would reduce by **AS3** and **AS4** to **‘moderate/minor’ adverse** effects as the embedded green infrastructure design and mitigation measures become established, and are also considered **‘not significant’**.

Users of intermediate range PRow, between 2-5km to the west of the Site

- 12.5.50 Views from PRowWs within the intermediate area (between 2-5km) to the west of the site (see Viewpoints 12 and 13) are limited, because of intervening landform, buildings, and structural vegetation (large woodland blocks such as Burch’s Rough, Backhouse Wood, Stockhills Wood and Poulton Wood, combined with an increasing numeracy of tree belts, shaws, hedgerows, and hedgerow trees) to only very occasional east-facing glimpses.
- 12.5.51 Consequently, The changes brought about by the proposed Development would only be experienced by users of a small number of the PRow through this area. Those that do have views to the site would experience occasional glimpses of new built form and the indirect impact from a discernment of slightly greater ambient light at night. The proposed structural planting along the western edge of the site (most of which would be implemented early on in the construction period), would reduce the extent of this in terms of both the length of path affected and prominence of the proposed Development. In addition, the placement of the tallest buildings away from this boundary, the use of minimal lighting and adherence to the ILP-GNROL, with regards to light spill, glare and sky glow would minimise effects further. Users of these PRowWs are not wholly unfamiliar with the type of development proposed and would generally view the proposed Development as part of wider panoramas, and therefore the proposed Development would appear visually integrated into its setting
- 12.5.52 The detailed assessment in ES Appendix 12.2 identified that when taking into account these existing factors, the effect on users of intermediate range PRow, between 2-5km to the west of the site would be **adverse**, but **‘not significant’** during any assessment scenario. The effect during construction (**AS1**) would be **‘minor’ adverse** given the temporary and reversible nature of these effects. The significance of effect would increase to **‘minor/moderate’ adverse** at **AS2** as the Development would be fully built but the structural planting would not be fully established. Whilst parts of the proposed Development would be noticeable, it would not be the defining element in the visual experience of users of these PRowWs and so would not markedly change the overall balance and make-up of this, and therefore is considered **‘not significant’** at **AS2**. The extent and scale of the proposed Development in views from these PRowWs would reduce slightly by **AS3** and **AS4**, but remain as

‘moderate/minor’ adverse effects, as the embedded green infrastructure design and mitigation measures become established, and so are also considered **‘not significant’**.

Users of localised/close range PRow, within 2km to the north of the Site

- 12.5.53 The detailed assessment in ES Appendix 12.2 identified that there would not be intervisibility between the proposed Development and all of the PRow through this area. Those directly affected would be HE224, HE228, HE229, HE262, HE263 and HE270 (as shown on Figure 12.3). There would be indirect impacts from a discernment of slightly greater ambient light at night, however, upon others.
- 12.5.54 The users of those PRow that would have sight of the Development would experience adverse impacts on account of the construction activity (in AS1) and further built-form (in AS2, AS3 and AS4) visible in the generally open agricultural views currently experienced – albeit users would not be wholly unfamiliar with the type of development proposed, they would generally view the proposed Development as part of wider views, only views southwards would be affected, and only a moderate part of the proposed Development would remain apparent.
- 12.5.55 Given, however, the proximity to the site of some of the PRow users identified (for example see Figures 12.68 to 12.72, and the fact that the proposed Development would be seen on the rising ground to the south the effects are considered **‘significant’ adverse** at **AS1** and **AS2**. By AS3 the proposed structural planting (most of which would be implemented at the commencement of the proposed Development’s overall construction), would be suitably established to reduce the prominence of the proposed Development. Whilst the Development would remain recognisable at this distance, views of it would not markedly alter the overall balance and make-up of the visual experience through this area, and therefore the at **AS3** and **AS4** the effect would be **‘not significant’**.

Users of localised/close range PRow, within 2km to the east of the Site

- 12.5.56 The detailed visual amenity impact assessment set out in ES Appendix 12.2 identified that the proposed Development would not be visible to users of most of the PRow through this area, and those that would have views to the proposed Development (including PRow HE313 and HE293) would experience it for short sections only. In addition, where views are possible it is only relatively small portions of the proposed Development that would be visible.
- 12.5.57 Whilst the proposed Development, once constructed, would remain apparent in some views from these few PRow concerned the proposed structural planting (a lot of which would be implemented by year 5 of construction), would reduce the extent of this in terms of both the length of paths affected and prominence of the proposed Development.
- 12.5.58 The proposed Development would bring about adverse effects on the visual experience of these users during construction and through operation on account of the added movement, activity and built form.
- 12.5.59 Users of these few PRow affected are, however, not wholly unfamiliar with the type of development proposed (i.e. on the basis that the settlements of Lympe and Newingreen, and the infrastructure of the M20, motorway service station and railway line etc. exist in which views already), and would generally view the proposed Development as part of wider views, and therefore the proposed Development would appear comparatively visually integrated into its setting at AS2. Following the proposed Development’s completion and the establishment of the structural planting

there would still be a small magnitude of change to users of the P_{RoW} on account of the distinct perception of large settlement and its infrastructure in views from them. Whilst the Development would remain recognisable at this distance, views of it would, on account of the broad multi-directional aspect of them and the small number of P_{RoW} affected, not considerably alter the balance and make-up of the visual experience through this area.

- 12.5.60 Consequently, the detailed assessment set out in ES Appendix 12.2 considered that there would be a **'moderate' adverse** effect that is **'not significant'** at **AS1** and **AS2**, reducing to a **'moderate / minor' adverse** effect at **AS3** and **AS4** which is also **'not significant'**.

Users of intermediate range P_{RoW}, between 2-5km to the north of the Site

- 12.5.61 The detailed assessment in ES Appendix 12.2 found that the direct sight of the proposed Development would not be experienced by users of all of the P_{RoW} through this area given the sharp changes in topography between the scarp and foot slopes of the North Downs and the variances in structural vegetation cover. A greater ambient light at night, however, is likely affect most users when looking south toward the site.
- 12.5.62 The users of those P_{RoW}s that do have views to the site would experience the adverse addition of construction sites, new residential and commercial buildings, structures, public open space, planting and lighting, and the loss of views over open agricultural and commercial land, and, on occasions, to further horizons. Sight of the majority of the proposed Development would be available to most users of P_{RoW} with views to the site on the scarp, because of their elevated position. Users of P_{RoW}s in the lower-lying area, however, would only really appreciate the central, northern and north-eastern parts of the proposed Development.
- 12.5.63 The proposed structural planting (most of which closest to this area would be implemented near the commencement of the proposed Development's overall construction), would reduce the extent of this in terms of both the lengths of path affected, the horizontal and vertical area of views affected, and the overall prominence of the proposed Development. The distance the Development would be perceived from (i.e. up to 5km) would also reduce the clarity, and hence the full awareness of the Development in views from this area, and therefore the proposed Development would with time appear increasingly visually integrated into its setting.
- 12.5.64 Following the proposed Development's completion and the establishment of the structural planting at AS3 and AS4 there would still be a moderate/minor effect to users of the small number of P_{RoW}s with views to the proposed Development upon the scarp on account of the continuing distinct perception of the Development. The Development (whilst still discernible at this distance) would not considerably alter the balance and make-up of the visual experience throughout this area on account of: the broad panoramic aspect of views from the scarp; the restrictions to views at the lower level; and the embedded design measures, such as the proposed structural planting and the design of the development as a legible settlement.
- 12.5.65 The receptors on these P_{RoW}s have a moderate/high sensitivity to the impacts that are likely arise from the proposed Development. Consequently, the effect upon them as a whole would, at **AS1**, be **'moderate' adverse**, but **'not-significant'** in so far that the proposed Development does not become the defining element in the receptors' visual experience at this time.
- 12.5.66 By completion of the Development at **AS2** the Development would, before the structural planting properly establishes, in some views through this area, be distinct

and would alter the balance and make-up of the visual experience moderately. Whilst this does not lead to an overall change in the nature of the view the Development would become one of the minor defining elements in the visual experience given other elements within the panoramic views from the scarp slope and those within the more restricted views from the lower-lying parts of this area, and therefore is considered '**significant**' **adverse**.

- 12.5.67 The extent and scale of the proposed Development in views from these PROWs would reduce as the final embedded green infrastructure design and mitigation measures become established at **AS3** and **AS4**. The proposed Development through these periods would not markedly change the overall balance and make-up of the visual experience from these receptors, as a whole, given other elements within the views through this area, and therefore is considered '**not significant**'.

National Trails and Long Distance Paths

North Downs Way National Trail

- 12.5.68 The detailed visual amenity impact assessment set out in ES Appendix 12.2 shows that there would be some adverse effects to the visual amenity of users of the NDW-NT, some of which, along a few stretches of the path during construction and at the beginning of the proposed Development's operation would be significant.
- 12.5.69 The proposed Development would replace what is visually perceived as a substantial area of open agricultural land (albeit clearly containing a variety of other land uses), within a number of views from the NDW-NT, with additional built-form, lighting and movement (particularly during the construction period).
- 12.5.70 The ZTV produced for this assessment (see Figure 12.10) and the fieldwork that has been carried out reveals that there are, however, extensive proportions of the NDW-NT through the study area that the proposed Development would not be visible from. In all, approximately only 5.5km of the 24.0km route of the NDW-NT through the study area would have clear or intermittent views to the proposed Development (see Figure 12.11). Views from the remaining lengths of the route would be obscured by landform, vegetation (woodland blocks are a common occurrence upon the crest of the scarp through this area) or buildings.
- 12.5.71 In addition, some stretches of the 5.5km of the NDW-NT that would have a view to the proposed Development are beyond the 5.0km distance from site boundary at which it has been determined that detail of built-development ceases from visually clear. From the stretches of the NDW-NT with views to the proposed Development beyond 5km (e.g. VPs 01 and 07), therefore, the proposed Development would appear more assimilated with the surrounding landscape. It is also evident that users of the NDW-NT at those vantage points that have views to the proposed Development from a distance of less than 5.0km from the site boundary, would be beyond 5.0km from other visible large settlements (i.e. Folkestone, Hythe or Ashford).
- 12.5.72 The research undertaken along the NDW-NT within the study area in preparation of this assessment has identified that familiarity with built-form, particularly settlements, large and small, both in the foreground of views (i.e. at the base of the scarp such as Wye and Brabourne), in the middle distance (such as Brabourne Lees and Sellindge), and in the far-distance (such as Ashford) in which the proposed Development would lie, is a common occurrence to users of the path. None of these existing settlements define the views from the NDW-NT, nor do they dominate or disturb, but are simply one of its constituent parts given the broadness of the panoramic views possible. It is strategic-scale development within the foreground, and not the midground or distance, of such views that the SDC-PTR considers to be inappropriate.

- 12.5.73 In addition, the key VPs along the NDW-NT that are recognised upon Ordnance Survey mapping (through the study area and elsewhere along its route) are often located where there are simultaneous views of both town and country. Whilst it is accepted that the value of such recognised VPs may, in part, be related to the ease at which many people who live in towns can access such views, what is apparent, from their popularity and notoriety is that users of them consider the sight of settlements to not diminish the enjoyment of such views. The combination of town and countryside is an aspect of the Vale of Holmesdale landscape that is also recognised within AONB-MP(2014-2019). Added to this, the visual character of the expansive areas of open agricultural land that would remain in the foreground and middle-distance of views along the NDW-NT through the study area are of sufficient in strength and robustness to repel a fundamental change in the balance of the visual experience arising from the introduction of the proposed Development.
- 12.5.74 Where sight of the proposed Development would be possible, from the relatively few vantage points that there are upon the NDW-NT, it would principally be seen within a broad panorama. As determined in the assessment of landscape character impact the proposed Development would only constitute a modest part of such wide and expansive views. The proposed Development would not break the skyline of such views or would it rise above the wooded crest of the greensand ridge. In addition, because of the north-west to south-east alignment of the scarp face through this area, a moderate proportion of views during users' kinetic experience of walking parts of the NDW-NT would be oblique, and only some would be direct.
- 12.5.75 The proposed Development's proposed belts of native structural vegetation, which would be equally visually apparent as the proposed built-form in such views would at AS3 and AS4 not only reduce the amount of new buildings and structures visible, but would also help in 'reading' and accepting the settlement. Their substantive nature would create a strong framework, based upon the current and historic field patterns of the area, between which parts of the town would visually appear to nestle. In such panoramic views the substantive belts would also help to visually create clearly understood constraints around the edge of the settlement.
- 12.5.76 Overall, therefore, the following have been taken into account in determining the significance of effect:
- The moderately small proportion of the NDW-NT through the study area, and even smaller area within this that the proposed Development would be clearly distinguishable from;
 - The acceptance that when views are possible, that sight of settlement within them is not uncommon, or detrimental as a principle;
 - The vertical visual narrowness that the proposed Development would be within most views;
 - The fact that the proposed Development's siting would still allow views over the top of it to the wooded crest of the greensand ridge and to areas beyond;
 - The proposed legibility of the proposed town, when clear and detailed views are possible; and
 - proposed embedded design mitigation measures that seek to further assimilate the proposed Development within its setting.
- 12.5.77 In consideration of the above, the effect on the users of the NDW-NT overall and as part of users kinetic experience along it, is considered to be '**moderate**' **adverse** at AS1 and '**significant**', '**moderate/major**' **adverse** and therefore '**significant**' at

AS2, reducing to **'moderate' adverse** and **'not significant'** at **AS3** and **AS4** as the proposed Development becomes visually integrated into its setting.

Saxon Shore Way – Long Distance Path

- 12.5.78 The SSW-LDP lies at its nearest point approximately 50m to the south-west of the application site boundary (as shown on Figure 12-3). This point along the path and the stretches of it either side separated from the site by layers of roadside structural vegetation and the buildings of the Lymgne Industrial Estate.
- 12.5.79 The assessment has found that whilst there may be a perception of increased lighting at night by users of the path there would be a negligible magnitude of change on account of the existing areas of lighting that already exists (i.e. the Lymgne Industrial Estate, Lymgne village and the Port Lymgne Animal Park). In addition, the substantial embedded design measures included within the proposed Development (i.e. the separation of any proposed buildings from the site's southern boundary by a minimum of approximately 75m, the planting of a 15m wide native tree belt within this gap, and the placement of the proposed tallest development blocks away from the crest of the greensand ridge) would ensure that such adverse impacts are generally small in nature.
- 12.5.80 On balance the adverse effect on users of the SSW-LDP is considered **'moderate / minor' adverse** at **AS1** as only a very small proportion of the overall construction activity is likely to be perceived. The effect would be **'moderate/minor' adverse** at **AS2** as the Development is fully built but the structural planting is not fully established, and **'minor/moderate' adverse** at **AS3** and **AS4** as the mitigation matures. At all assessment scenarios the effect is considered **'not significant'**.

Outdoor Recreational Areas

Open Access Land between 2-5km from the site

- 12.5.81 The detailed assessment in ES Appendix 12.2 found that the direct sight of the proposed Development would not be experienced by users of all parts of the Open Access Land (shown on Figures 12.2 and 12.3) given intervening topography, existing structural vegetation, and existing built form. A greater ambient light at night, however, is likely affect most users when looking south toward the site.
- 12.5.82 The users of those parts of the Open Access Land that do have views to the site would experience the adverse addition of construction sites, new residential and commercial buildings, structures, public open space, planting and lighting, and the loss of views over open agricultural and commercial land, and, on occasions, to further horizons. Sight of the majority of the proposed Development would be available to most users of Open Access Land with views to the site on the North Downs scarp, because of their elevated position. Users of Open Access Land in the lower-lying area (e.g. Gibbons Brook Open Access land), however, would only really appreciate the northern parts of the proposed Development.
- 12.5.83 The proposed structural planting (most of which closest to these areas would be implemented near the commencement of the proposed Development's overall construction), would reduce the extent of the proposed Development that is visible in terms of both the areas of Open Access land affected, the horizontal and vertical area of views affected, and the overall prominence of the proposed Development. The distance the Development would be perceived from (i.e. up to 5km) would also reduce the clarity, and hence the full awareness of the Development in views from the further areas of Open Access Land, and therefore the proposed Development would with time appear increasingly visually integrated into its setting.

- 12.5.84 Following the proposed Development's completion and the establishment of the structural planting at AS3 and AS4 there would still be an effect to users Open Access Land with views to the proposed Development upon the scarp on account of the continuing distinct perception of the Development. The Development would not, however, considerably alter the balance and make-up of the visual experience throughout these areas on account of: the broad panoramic aspect of views from the scarp; the restrictions to views at the lower level; and the embedded design measures, such as the proposed structural planting and the design of the development as a legible settlement.
- 12.5.85 The receptors in the areas of Open Access Land between 2-5km from the site have a moderate/high sensitivity to the impacts that are likely arise from the proposed Development. Consequently, the effect upon them as a whole would, at **AS1**, be '**moderate**' adverse, but '**not significant**' in so far that the proposed Development does not become the defining element in the receptors' visual experience at this time.
- 12.5.86 By completion at **AS2** the Development would, before the structural planting properly establishes, in some views from the areas of Open Access Land between 2-5km from the site, be distinct and would alter the balance and make-up of the visual experience moderately. Whilst this does not lead to an overall change in the nature of the view the Development would become one of the minor defining elements in the visual experience given other elements within the panoramic views from the scarp slope and those within the more restricted views from the lower-lying parts of this area, and therefore is considered '**significant**'.
- 12.5.87 The extent and scale of the proposed Development in views from the areas of Open Access Land between 2-5km from the site would reduce further as the final embedded green infrastructure design and mitigation measures become established at **AS3** and **AS4**. The proposed Development through these periods would not markedly change the overall balance and make-up of the visual experience from these receptors, as a whole, given other elements within the views through this area, and therefore is considered '**not significant**'.

Open Access Land beyond 5km from the site

- 12.5.88 In comparison to these effects, the receptors in the areas of Open Access Land beyond 5km from the site (e.g. Peene Country Park) would experience a lesser effect at each assessment scenario on account of the smaller proportion that the proposed Development would contribute to the existing views from this area. At **AS1** the effect would be '**minor / moderate**' adverse, and so '**not-significant**'.
- 12.5.89 By completion at **AS2** the Development would, before the structural planting properly establishes, in some views from the areas of Open Access Land beyond 5km from the site, be noticeable but would not alter the balance and make-up of the visual experience. As it would not lead to an overall change in the nature of the view, and because the Development would become a minor elements in the visual experience the effect is considered '**moderate / minor**' adverse and therefore '**not significant**'.
- 12.5.90 The extent and scale of the proposed Development in views from the areas of Open Access Land beyond 5km from the site would reduce further as the final embedded green infrastructure design and mitigation measures become established at **AS3** and **AS4**. The proposed Development through these periods would not markedly change the overall balance and make-up of the visual experience from these receptors, as a whole, given other elements within the views through this area, and therefore is considered '**not significant**'.

Other Recreational Receptors

- 12.5.91 Receptors at of the other recreational areas identified (Lympne Airfield, Westenhanger Castle & Port Lympne Animal Park) would at **AS1** experience, at worst, **'moderate' adverse** effects to their visual amenity. These effects are considered **'not significant'** on account of the fact that the proposed Development would not be the defining element in the receptors' visual experience at these locations, taking into account the construction-related embedded design, mitigation and enhancement measures.
- 12.5.92 At **AS2** the receptors would also experience at worst, **'moderate' adverse** effects to their visual amenity as the proposed Development is completed. These effects are considered **'not significant'** on account of the fact that the proposed Development would not be the defining element in the receptors' visual experience at these locations, taking into account the embedded design, mitigation and enhancement measures – in particular the structural planting proposals (many of which would be in place early on during the construction period).
- 12.5.93 At **AS3** the embedded design and additional mitigation measures establish the effect would, at worst, reduce to **'moderate / minor' adverse**, and therefore **'not significant'**.
- 12.5.94 There would be a **'moderate' beneficial 'not significant'** effect at **AS3 & AS4** to users of Westenhanger Castle on account of the removal of existing discordant buildings between it and the land to the south, and the proposed creation of a more parkland setting to its southern outlook.

Existing Settlements

- 12.5.95 The detailed visual amenity impact assessment set out in ES Appendix 12.2 shows that the proposals were found to be noticeable from existing settlements (i.e. Lympne, Westenhanger, Newingreen, Barrow Hill, Stanford, Court-at-Street, Aldington Church, Brabourne and Sellindge) but due to the distances from the nearest new built-development, the degree of conserved intervening vegetation, the proposed buffer zones, coupled with the proposed embedded design and mitigation measures there would be no overbearing impacts.
- 12.5.96 As such the detailed visual amenity impact assessment set out in ES Appendix 12.2 shows that the effect on the users and residents of the existing settlements is considered to be at worst **'moderate' adverse** at **AS1** but **'not significant'**, on account of the construction-related mitigation measures in place.
- 12.5.97 At **AS2** it was considered that there would be a **'major / moderate' adverse** and **'significant'** effect upon the residents and users of Westenhanger on the basis that, despite the mitigation measures implemented, the new built form would be generally apparent on all sides of the settlement and the structural planting around it would not have been adequacy mature to visually ameliorate this. By AS3 (and AS4) the structural planting would have established and there would be a **'moderate' adverse**, but **'not significant'** effect.
- 12.5.98 For all other settlements there would be at worst a **'moderate' adverse** but **'not significant'** effect at **AS1** given the construction-related mitigation measures proposed. There would still be, at worst, a **'moderate' adverse** effect upon the residents and users of some settlements at AS2 when the proposed Development is complete. These are considered **'not significant'** on account of the range of embedded design measures implemented which would ensure that there are not 'over bearing' or dominating effect to the settlements.

12.5.99 BY **AS3** and **AS4** as the proposed structural planting and green infrastructure measures have established there would be at worst a '**moderate / minor**' adverse '**not significant**' effect.

Individual Dwellings

12.5.100 The detailed assessment within ES Appendix 12.2 assesses the visual impact upon the residents of those dwellings inside and immediately outside of the application site boundary.

Individual dwellings inside the application site boundary

12.5.101 As set out in the OP-DS the individual dwellings within the application site boundary are either to be retained and incorporated within the proposed Development or demolished to make way for new built-form as outlined on the parameter plans and SDP. It also identifies buildings for which a decision on retention or demolition would be decided upon at planning Tiers 2 or 3.

12.5.102 For the purpose of conducting an LVIA upon a worst case scenario the detailed assessment set out in ES Appendix 12.2 assumes, that the current occupiers of those dwellings that are to be retained may remain in their residencies during the construction and operation of the proposed Development. It also assumes that the current occupiers of those dwelling that are to be demolished may remain in their residences for the majority of the construction period.

All Dwellings

12.5.103 The assessment concludes, despite the proposed construction-related mitigation, construction activity at **AS1** would be immediately apparent and prominent from some aspects of these houses and from their domestic curtilage, particularly those along the A20 whose current visual amenity includes views to the rising ground towards Lympne and the airfield and those with views across the race course to the escarpment of the North Downs. Such activity would bring about a recognisable change in views, and so was considered '**major-moderate**' adverse and '**significant**'.

Dwellings that are to be Retained

12.5.104 At **AS2**, once the proposed Development is complete many current views from these houses and their curtilage (particularly those along the A20 near to the proposed 'Town Centre' character area where the proposed buildings are at their highest) would, to varying degrees, be detrimentally replaced by new dense built form up to 18m in height. Subsequently the proposed Development would be immediately apparent and prominent in certain views. Taking into account the high sensitivity of these receptors the overall effect is considered to be '**major / moderate**', adverse and '**significant**'.

12.5.105 On account of the SDP confirming that the separation distances between existing residential properties and new development being subject to detailed design at planning Tiers 2 and 3 to avoid unacceptable overbearing effects upon occupiers, and because proposed structural planting mitigation that would be implemented around such properties would be nearing the same height as many of the existing dwellings by this stage the visual impact is considered to not be not dominating to the receptors as a whole.

12.5.106 By **AS3** and **AS4**, 15 and 30 years following scheme completion, respectively, the proposed mitigation structural planting would be sufficiently high and mature to hinder clear views to the new built form from the existing houses and domestic curtilage

(although in winter months the built form would still be partially visible through such vegetation). Considering the properties overall, the proposed Development would still form a visible, distinct and recognisable change in some views, but would only moderately effect the balance and make-up of the visual experience as a whole. This would give rise to a '**moderate**' **adverse** effect that is considered '**not significant**'.

12.5.107 In addition to the considerations above - the majority of the individual dwellings inside of the application site boundary are either owned or controlled by the applicant (in so far as a 'option agreement' has been reached with the property owners to sell the property should planning permission be granted). There are, however, some dwellings that the applicant does not own or control. The occupiers of these dwellings are aware of the allocation of the garden settlement within the F&HDC Core Strategy and the potential change to the visual outlook from their property.

Individual dwellings immediately outside of the application site boundary

12.5.108 The detailed visual amenity impact assessment set out in ES Appendix 12.2 shows that the residents of the individual properties immediately outside of the site boundary (i.e. those listed in 12.3.282) have a moderate/high sensitivity to the likely construction and operational impacts brought about by the proposed Development.

12.5.109 The effect experienced by residents as a whole would, through the construction period (**AS1**), be '**moderate**' **adverse** in nature, but '**not significant**' insofar that the Development would not become the defining element across these, and any change would be temporary.

12.5.110 At **AS2**, when the proposed Development is complete, there would be a greater awareness of the Development (on account of it constituting a greater proportion of available views) from some of these individual properties. The proposed Development would be apparent, and in some cases prominent and therefore a '**moderate / major**' **adverse** effect would occur – which would be '**significant**'. The suitable separation distances between them and new areas of built-form, the retention of existing vegetation, the stepping down of new building heights near to them, and given that the proposed vegetation, planted early on in the construction period would be establishing means that no visual experience would be dominating or over bearing.

12.5.111 As the sections of the proposed Development's embedded green infrastructure design and mitigation measures become established (**AS3** and **AS4**) the visual changes would be less distinct, and the proposed Development would constitute a smaller component of the overall visual experience of users and residents of the individual properties. The detailed assessment in ES Appendix 12.2 considered therefore that the effects would be '**moderate**' **adverse** but '**not significant**'.

Highways & Associated Areas

12.5.112 Receptors upon the 'highways and associated areas' identified (users of Junction 11 of the M20 and the adjacent Service Station, users of roads through the site including the A20, Stone Street and Otterpool Lane, and users of roads within 0-2km of the site including Hythe Road, Stone Street, Aldington Road, Harringe Lane, Kennet Lane) would at **AS1** experience, at worst, '**moderate**' **adverse** effects to their visual amenity. These effects are considered '**not significant**' on account of the fact that the proposed Development at construction would not be the defining element in the receptors' visual experience at these locations, taking into account the construction-related embedded design, mitigation and enhancement measures.

12.5.113 At **AS2** the receptors along the roads through the site would experience a '**moderate / major**' adverse and '**significant**' effect on account of the fundamental changes that would have occurred to their visual outlooks once the proposed Development is completed. The other receptors would experience '**moderate / minor**' adverse and '**not significant**' effects.

12.5.114 By **AS3** and **AS4** there would be '**moderate**' adverse effects to the users of the road through the site, to account for the change experience as a result of the proposed Developments almost complete enclosure of them. These are considered '**not significant**', however, due to the of the proposed open spaces, tree lines margins and other visually agreeable GI measures that would have established along them by this time. The other receptors during these assessment scenarios would experience, at worst, '**minor / moderate**' adverse and so '**not significant**' effects.

12.5.115 At **AS3** the embedded design and additional mitigation measures establish the effect would, at worst, reduce to '**moderate / minor**' adverse, and therefore '**not significant**'.

Cumulative Assessment

Landscape Character

12.5.116 The cumulative assessment set out in ES Appendix 12.2 found that, when the proposed Development was combined to a baseline where the identified 'under construction', 'approved', and 'allocated' developments around Ashford and within Sellindge were in place, there would be impacts upon the following characteristics of the identified landscape character receptors:

- attractive panoramic views,
- a sense of remoteness, and
- an unsettled landscape and perceived rurality.

12.5.117 It was determined that, whilst there would be some intensification of built form / settlement in the panoramic views, and a diminishment in the perceived sense of remoteness and rurality (through increased built form, movement and lighting) from the LCAs assessed as a result of the combined change, this would not:

- tip the balance of existing 'non-significant' effects into 'significant' ones
- transform the LCAs into different landscape types,
- introduce additional significant effects.

12.5.118 In most instances the impacts were moderated by the embedded design and further mitigation measures associated with the proposed Development, and the facts that:

- Most other characteristics of the LCAs would remain unaffected;
- The distances between the developments around Ashford and those at the site and at Sellindge would be suitably large to dispel opportunities where all developments would be seen clearly in one view.
- The developments around Ashford would be difficult to distinguish in many of the characteristic views on account of the relatively low-lying land they are located upon and the fact that the majority would be seen against the back drop of the existing built-up area of Ashford.
- The developments in Sellindge are sited in relatively enclosed locations.

- The proposals / policy diagrams associated with the developments within Sellindge contain proposals for the advance planting of substantial belts of structural vegetation along their edges
- The developments in Ashford are reasonably anticipated to also contain, or would only be permitted on condition of measures to mitigate the adverse impacts of construction and operational activity on adjoining areas.

12.5.119 With regards to the cumulative impact of the proposed Development in combination with the OFMA it was found that there was a general lack of intervisibility between affected LCAs and the OFMA on account of:

- the proposed Development having been constructed before the OFMA on intervening land; and
- the proposed mitigation planting between these having begun to establish by the time the OFMA's construction has begun.

12.5.120 As such, the OFMA, when introduced to a baseline where the proposed Development was in place (i.e. as AS3), would not:

- tip the balance of existing 'non-significant' effects into 'significant' ones (apart from within the LCA (SDC-11) which would physically contain the OFMA development),
- transform the LCAs into different landscape types,
- introduce additional significant effects (apart from within the LCA (SDC-11) which would physically contain the OFMA development).

Visual Amenity

12.5.121 The cumulative assessment set out in ES Appendix 12.2 found that, when the proposed Development was combined to a baseline where the identified under construction, approved, and allocated developments around Ashford and within Sellindge were in place, the impacts on visual amenity would generally be on the receptors:

- Upon the escarpment and scarp slope of the North Downs;
- In viewpoints to the south-west of the site; and
- In viewpoints near to Sellindge.

12.5.122 It was determined that, whilst there would be some intensification of built form / settlement in the panoramic views (through increased built form, movement and lighting) from the LCAs assessed as a result of the combined change, this would not:

- tip the balance of existing 'non-significant' effects into 'significant' ones
- introduce additional significant effects.

12.5.123 In most instances the impacts were moderated by the embedded design and further mitigation measures associated with the proposed Development, and the facts that:

- The distances between the developments around Ashford and the visual receptors would be suitably large to dispel opportunities where all developments would be seen clearly in one view.
- The developments around Ashford would be difficult to distinguish in many views on account of the relatively low-lying land they are located upon and the fact that the majority would be seen against the back drop of the existing built-up area of Ashford.

- The developments in Sellindge are sited in relatively enclosed locations.
- The proposals / policy diagrams associated with the developments within Sellindge contain proposals for the advance planting of substantial belts of structural vegetation along their edges
- The developments in Ashford are reasonably anticipated to also contain, or would only be permitted on condition of measures to mitigate the adverse impacts of construction and operational activity on adjoining areas.

12.5.124 With regards to the cumulative visual impact of the proposed Development in combination with the OFMA it was found that there was a general lack of intervisibility between affected viewpoints and the OFMA on account of:

- the proposed Development having been constructed before the OFMA on intervening land; and
- the proposed mitigation planting between these having begun to establish by the time the OFMA's construction has begun.

12.5.125 As such, the OFMA introduced to a baseline where the proposed Development was in place would not:

- tip the balance of existing 'non-significant' effects into 'significant' ones
- introduce additional significant effects (apart from within the visual receptors which would be inside of the OFMA development).

12.5.126 As such, the cumulative effects on visual amenity (not including those viewpoints where, and at those assessment scenarios when, the effect on visual amenity by the proposed Development alone was found to be significant) were found not to bring about any further significant effects.

Landscape Related Designations

12.5.127 In order for the impacts (both singularly and cumulatively) upon designated areas of be determined a number of factors need to be considered. Firstly, the effects on the landscape character of the designated area must be assessed, then secondly the effects on views from within and towards it. These effects are then considered in light of the documented 'special qualities', valued elements or characteristics, and the purposes of the designation.

Kent Downs Area of Outstanding Natural Beauty

Landscape Character Effects

12.5.128 The effects upon the landscape character of the AONB (both singularly and cumulatively) have been assessed as part of the landscape character impact assessment carried out within this assessment. This used as its baseline the most up to date and detailed landscape character assessment data available (i.e. the SDC-HLLA and the ABC-LC SPD) and supplemented this with information within other known LCAs (i.e. the AONB-KDL, the KCC-LAK and the AONB-MP (2021-2026)), field work and the site-specific landscape character assessment that was carried out in preparation of this assessment.

12.5.129 The detailed assessment tables set out in ES Appendix 12.2 considered that there were some adverse effects upon a few of the characteristics of those LCAs that contain the AONB within the study area - most notably upon the characteristic of far-reaching panoramic views. It was considered, however, that the change to the valued characteristic of far-reaching panoramic views as a whole would not alter its

fundamental nature, and that it would only be felt across a moderately small proportion of the LCAs it helps characterise. In addition, whilst the change would be mostly permanent and irreversible it would be felt less keenly with time as the proposed structural planting establishes.

- 12.5.130 Likewise, it was found that the proposed Development would bring about some diminishment of the sense of wildness and remoteness that characterise some of those LCAs that contain the AONB. The assessments considered, however, that the scale of change was not sufficient that these elements would no longer be key characteristic of these LCAs.
- 12.5.131 As such, the overall integral character of those LCAs which contain the AONB would be maintained. Most of the components, characteristics, and perceptual and aesthetic qualities that shape their moderate/high sensitivity remain unaltered, despite (after taking into account the embedded design, mitigation measures) some experiencing a small magnitude of adverse and largely irreversible change. The embedded design measures, such as the proposed structural planting and the design of the development as a legible settlement would ensure that the effects were felt less keenly with time. Overall, the effects on the LCA which contain the AONB were at worst of 'moderate/minor' adverse significance at any assessment scenario and therefore 'not significant' during construction or operation of the proposed Development (the single exception to this is single 'moderate' adverse, but 'not significant' effect upon the landscape character of LCA: SDC-06 (Stanford) at AS1. Only a very small portion of the LCA is covered by the AONB designation).

Visual Amenity effects

- 12.5.132 The visual amenity impact assessment set out in ES Appendix 12.2 (and summarised above) considered that there were 'significant' adverse visual effects upon users of the NDW-NT, some PRow and at a few areas of Open Access Land within the AONB during AS1 and AS2 (on account of the proposed Development being distinct and a minor defining element in certain views).
- 12.5.133 The extent and scale of the proposed Development in these views would, however, markedly reduce as the embedded green infrastructure design and mitigation measures become established by AS3 and AS4. As such the proposed Development would not remarkably change the overall balance and make-up of the visual experience from the AONB. The AONB is considered, therefore, to be sufficient in strength and robustness to repel a fundamental change in the balance of the visual experience of users arising from the introduction of the proposed Development (both singularly and cumulatively).

Effects on the Special Characteristics and Qualities

Dramatic Landform and Views

- 12.5.134 The landscape character impact assessment and the visual amenity impact assessment both considered (both singularly and cumulatively) that, whilst there were some significant adverse effects upon certain receptors at a few of views from the areas within the AONB, that the effects were on balance at worst of moderate/minor significance, and adverse, during construction or operation of the proposed Development.
- 12.5.135 Settlements in the view from the AONB were found to be typical, and recognised by the AONB-MP (2014-2019). The proposed Development would not hinder views to Romney Marsh and Hythe Bay from the greensand ridge and Hythe escarpment.

12.5.136 In respect of the ‘setting’ of the AONB, it was determined in section 12.3 that four distinct geographic areas of this occur. As shown on Figure 12.08 these are: the area of the AONB to the east of the A20 and Stone Street, which directly abuts parts of the site’s eastern edge; the Hythe escarpment, which directly abuts parts of the site’s southern edge; the North Downs escarpment; and the land within the AONB at the foot of the scarp.

12.5.137 The proposed Development is considered to adhere to the guidance set out in the AONB-SPS:

- Care has been taken over the site layout, height of proposed built-form to minimise impact when viewed from the AONB;
- Sufficient densities of built-form have been set to allow for significant tree planting between buildings. In addition, approximately 50% of the proposed Development would be green infrastructure;
- Consideration has taken place of the landscape character, land-uses and heritage assets within the environs of the site to assimilate it into its setting, and assist the supporting surrounding green infrastructure assets around and beyond it;
- The design codes, that will assist in the detailed design of the proposed Development will set out the use of colours, materials and non-reflective surfaces, as indicated in the DAS;
- The proposed Development would adhere to the Institution of Lighting Professionals (ILP) Guidance Notes for the Reduction of Obtrusive Light, with regards to light spill, glare and sky glow;
- The proposed Development proposes the grouping of new structures and buildings close to existing structures of the railway station and service station to avoid new expanses of development that are visible and out of context;
- The proposed Development proposes substantial mitigation measures, including native landscaping that is locally appropriate;
- A Community Facilities Delivery Statement will set out the strategy for the long-term management and governance of all infrastructure of community benefit, including the strategic public open space and GI; and
- The proposed substantial structural planting around the edge of the proposed Development would ensure that an abrupt change of landscape character would not occur.

12.5.138 In addition, the proposed Development would incorporate valued views back to the North Downs escarpment from within the site and from areas that have a view to the scarp across the site such as at VPs 10, 14 and 18.

A Rich Legacy of Historic and Cultural Heritage

12.5.139 It is considered that there would be some positive outcomes upon the landscape character and visual amenity related aspects of this ‘special component / characteristic / quality’ - by revealing, conserving, interpreting and making accessible, areas of the site which have a degree of intervisibility with the AONB (such as Westenhanger Castle and its parkland, the historic barrows, Otterpool Quarry and Lympne Airfield), the richness of the overall area’s historic landscape would be better recognised, protected and understood.

Tranquillity and Remoteness

- 12.5.140 With regards to the ‘special characteristic and quality’ of remoteness and tranquillity within the AONB, the detailed character impact assessment, set out in ES Appendix 12.2, shows that there would be a diminishment in the degree of this as a result of the proposed Development (particularly during the construction period when the aspect of movement combines with those of built-form and lighting).
- 12.5.141 The scale of change however would be small given the: the broadness of panoramas (of which the proposed Development would only be a part of); the distance from the more tranquil and remote parts of the AONB to the proposed Development and the quieter, unhurried nature of the land in between; and the fact that the aspects of contrast, openness, natural beauty, and landform transcending built-form remain parts of the perceptual and aesthetic qualities of these LCAs.

Access, Enjoyment and Understanding

- 12.5.142 Given that the proposed green infrastructure scheme has been designed to provide users and residents of the proposed Development with a sufficient diversity and quantity of accessible public open space (over 50% of the OPA), it is considered that concerns about the potential recreational pressure on the AONB would be suitably abated, and that there would be no considerable adverse outcomes on this ‘special characteristic and quality’.

Effects on the Purpose of the Designation

- 12.5.143 The detailed landscape character and visual amenity assessments (both singularly and cumulatively) show that whilst there would be some adverse effects on some of the key characteristics of, and views from areas contained within the AONB that these would not bring about substantial effects to the Special Characteristics and Qualities of the designation as a whole.
- 12.5.144 The proposed Development conserves key attributes of this part of the AONB such as: the outlook from the North Downs escarpment as one containing open countryside towns and the sea; the views back to the escarpment from within and through the site; and the skyline of the wooded greensand ridge in views from the escarpment, with Romney Marsh, Hythe Bay and the High Weald beyond.
- 12.5.145 The proposed Development would also enhance key elements such as: reinforcing the boundaries of the AONB with native woodland planting where the site adjoins it; improving the visual assimilation of the existing roundabout to the south of Junction 11 of the M20 into the surrounding AONB landscape which lies immediately to its east; and ameliorating the current discordant views to the Lympne Industrial Estate in views from the North Downs escarpment and its foot-slopes.
- 12.5.146 As such the ‘natural beauty’ of the AONB– being the purpose of the original designation, and, as outlined by the Countryside Agency in their publication *Areas of Outstanding Natural Beauty: A guide for AONB Partnership Members* (Countryside Agency, CA24, November 2001), defined as “*natural beauty is not just the look of the landscape, but includes landform and geology, plants and animals, landscape features and the rich history of human settlement over the centuries*”, would not be substantially affected by the proposed Development.

The Special Landscape Area: North Downs

- 12.5.147 Within F&HDC the North Downs SLA (approximately 13,750ha) includes all areas covered by the AONB designation and a few areas of land (totalling approximately 510ha) outside of this.

- 12.5.148 The area covered by the North Downs SLA designation that lies within the study area but outside of the AONB are shown on Figure 12.2 and Figure 12.3.
- 12.5.149 Within the site this includes the approximately 40ha triangle of agricultural land to the west of Stone Street and east of the Sandling Park.

Landscape Character Effects

- 12.5.150 The direct effects upon the character of the singular area and small portion of the SLA designation within the far north eastern part of the site were determined as part of the Landscape Character Assessment carried out (both singularly and cumulatively) within this assessment. This used as its baseline the most up to date and detailed landscape character assessment data available (i.e. the SDC-HLLA and the ABC-LC SPD) and supplemented this with information within other known LCAs (i.e. the AONB-KDL and the KCC-LAK), field work and the site-specific landscape character assessment that were carried out in preparation of this assessment.
- 12.5.151 Our site-specific landscape character assessment determined that this portion of agricultural land, had no remarkable characteristics, components, or aesthetic features above those of the adjoining field parcels within the site. It was noted that the area contains a few dwellings, including the distinctive red brick buildings of Hillhurst Farm and the attractive triple Victorian terrace of Little Greys, but that its perceptual qualities are strongly influenced by the built form, movement and noise of the surrounding land uses (the railway, the elevated motorway junction, the motorway service station, and A20). The area is visually constrained by the woodland vegetation along the edge of Sandling Park to the east, but has more open views across the shallow valley of the East Stour River over the dense vegetation through Westenhanger. In addition, there are views out to the North Downs escarpment from above the structures, vegetation and paraphernalia of the railway, and the motorway junction and service station.
- 12.5.152 The changes that would occur to this portion of the SLA are the direct replacement of its current rural land use (albeit one surrounded on two sides by built development i.e. the settlement of Westenhanger to the west, and the railway line, railway station, M20, its service station, and elevated M20 junction to the north), with an area of residential, commercial and infrastructure development, including the dualling and realignment of the A20.
- 12.5.153 The Landscape Character Impact Assessment concluded that there would be a fundamental change to the character of the LCA that covers this portion of the North Downs SLA. The key landscape components, characteristics, and perceptual and aesthetic qualities, (after taking into account the proposed changes, as well as the embedded design, mitigation and enhancement measures) would shift from one that is rural, to one that is urban. Overall the effect of landscape character was judged to be at worst of moderate / major significance, and adverse, and therefore 'significant' at AS1, AS2, AS3 and AS4.
- 12.5.154 It was considered, however that the degree of significance would reduce with time as impacts of the embedded design and mitigation proposals (which include substantial native tree belts around the edge and through the central areas of the land parcel, as part of the overall proposed Green Infrastructure strategy) establish and mature.
- 12.5.155 The direct and indirect effects upon the landscape character of the remaining approximately 470ha of the North Downs SLA designation (outside of the site) within F&HDC that have potential to experience significant effects arising from the proposed Development were also assessed within the detailed assessment of LCAs within ES Appendix 12.2. The effect upon the LCAs that these areas are part of was judged to

be at worst ‘moderate/minor’ and ‘adverse’, and therefore ‘not significant’ at any assessment scenario.

Visual Amenity Effects

- 12.5.156 The effects upon the visual amenity of receptors in and around this portion of the North Downs SLA were considered (both singularly and cumulatively) as part of the Visual Amenity Impact Assessment set out in ES Appendix 12.2 (see the visual assessment referencing VPs 8, 9 and 20). There was found to be an initial ‘significant’ adverse effect upon users of the PRoWs that cross through whole proposed Development site during the construction (at AS1) of the proposed Development.
- 12.5.157 The effect on users of the PRoWs upon completion of the proposed Development (AS2) was considered to be ‘moderate / major’ and ‘adverse’, and therefore also ‘significant’. Following establishment of the green infrastructure related embedded design and mitigation measures (including protection of the PRoW through this portion of land within 15-30m wide structurally planted greenways, and the enclosure of the new A20 dual carriageway within planted tree belts) the significance of the effect (at AS4) would reduce to ‘moderate’ adverse, and on balance ‘not significant’.
- 12.5.158 In addition to those PRoWs within the site, a number of PRoWs outside of the site were also found to be impacted upon by proposed Development within this portion of the SLA. It was considered that proposed Development here would contribute to the adverse effects upon users of the PRoW to the north, east and south of it. The effect on these users would be the addition of further built form in what are predominantly rural outlooks but which also contain awareness of existing built development (i.e. the settlement of Westenhanger to the west, and the railway line, railway station, M20, its service station, and elevated M20 junction to the north). The significance of the visual effects of the whole proposed Development on the users of these PRoWs was found to be at worst ‘moderate adverse’, but on balance ‘not significant’.
- 12.5.159 The effects of the proposed Development as a whole on the visual receptors within the areas of the North Downs SLA outside of the site has also been assessed. This determined that the significance of these effects upon users of the PRoW through these areas was at worse ‘moderate’ adverse and ‘significant’ at AS1, and ‘moderate/major’ adverse and ‘significant’ at AS2, but reducing to ‘moderate’ adverse and ‘not significant’ at AS3 and AS4.

Effects on the Special Characteristics and Qualities

- 12.5.160 Whilst planning policy NE3 of the F&HDC-P&PLP states that the SLA within the F&HDC administrative area is “*of countywide landscape significance*” no published document provides a further description of the key characteristics or special qualities that convey this level of protection.
- 12.5.161 In the absence of any description of the key characteristics or special qualities of the SLA, the findings of the Landscape Character Impact Assessment, within this LVIA, are relied upon instead.

Effects on the Purpose of the Designation

- 12.5.162 From consideration of the current and emerging F&HDC development plans the purpose of the North Downs SLA designation within the District is to protect or enhance the natural beauty of this landscape of ‘county-wide’ significance which is “*significant to the setting of the Kent Downs*” (SDC-CS, paragraph 5.51), “*unless the need to secure economic and social wellbeing outweighs the need to protect them*” (SDC-LPR policy CO4 and F&HDC-P&PLP policy NE3), noting that the preamble to SDC-LPR policy CO4 states that development within the SLA should be “*kept to a*

minimum and where acceptable, should be designed and constructed so that the visual impact on the landscape is minimised and it makes a positive contribution to the attractiveness of the area.”

- 12.5.163 Our site-specific landscape character assessment determined that this portion of land had no remarkable characteristics, components, or valued perceptual or aesthetic features above those of the adjoining field parcels within the site. Its character was also found to be shaped by the surrounding land uses and planning context, most notably the paraphernalia of the transport corridor to the north and the presence of the AONB directly to the east.
- 12.5.164 As with the other sections of the North Downs SLA designation that lie outside of the AONB and to the north of the site (see Figure 12.3), this land appears to geographically provide a buffer to this designation.
- 12.5.165 As such the proposed Development proposes the realignment of the A20 (albeit as a dual carriageway) away from the eastern boundary with the AONB, and the early establishment of a substantial structural native tree belt between the two. This would both visually protect this part of the AONB and provide a robust defensible edge between it and the proposed Development.
- 12.5.166 In addition, the distinctive red brick buildings of Hillhurst Farm and the attractive triple Victorian terrace of Little Greys that lie within the parcel of land would be retained and the further stages of the proposed Development’s planning would ensure that they are sensitively incorporated into the detailed layout of the proposed Development. The proposed green infrastructure strategy ensures that the new buildings are set back from the site’s boundary with the existing dwellings of Westenhanger along Stone Street and from the very southern edge of the area to protect views from outside the site towards the North Downs escarpment, and the route of the existing PRoWs are infolded within wide tree belts.
- 12.5.167 Whilst there would be harm to the North Downs SLA designation on account of the change of this portion of it from one with a fundamentally rural character to urban form, within the wider context it amounts to a small degree of change – some 8% of the North Downs SLA outside of the AONB, or 0.3% of the overall North Downs SLA within the District. The landscape character, and the visual amenity of users of the remaining areas of the designation outside of the site would not be substantially affected.

12.6 Monitoring

- 12.6.1 There are no monitoring requirements that have been identified for landscape character and visual amenity receptors.

12.7 Assessment Summary

- 12.7.1 Table 12-26 and Table 12-27 provide an assessment summary with respect to Landscape Character and Visual amenity including the potential significant effect with embedded design measures in place, and additional measures required to reach the residual significance of effect.

Table 12-26 Landscape Character Impact Assessment Summary

Definitions:

AS1 = Assessment scenario 1: Peak Construction Year

AS2 = Assessment scenario 2: Year 0 following completion– Operation Year 0

AS3 = Assessment scenario 3: Year 15 following completion – Operation Year 15

AS4 = Assessment scenario 4: Year 30 following completion – Operation Year 30

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Landscape character of the site						
<p>Area covered by LCA SDC-11 Lymgne</p> <p>Non-cumulative assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Sensitive Land Use Siting - Sensitive Layout Detail - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Further Space for Green Infrastructure - Blue Infrastructure Proposals - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1: Moderate / Major Adverse - SIGNIFICANT</p> <p>AS2: Moderate / Major Adverse - SIGNIFICANT</p> <p>AS3: Moderate Adverse - SIGNIFICANT</p> <p>AS4: Moderate Adverse - SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate / Major Adverse - SIGNIFICANT</p> <p>AS2: Moderate / Major Adverse - SIGNIFICANT</p> <p>AS3: Moderate Adverse - SIGNIFICANT</p> <p>AS4: Moderate Adverse - SIGNIFICANT</p>
<p>Area covered by LCA SDC-11 Lymgne</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Sensitive Land Use Siting - Sensitive Layout Detail - Sensitive Consideration of Building Heights 	<p>AS1: Moderate / Major Adverse - SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate / Major Adverse - SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Cumulative assessment	<ul style="list-style-type: none"> - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Further Space for Green Infrastructure - Blue Infrastructure Proposals - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS2: Moderate / Major, adverse: SIGNIFICANT</p> <p>AS3 : Moderate / Major, Adverse- SIGNIFICANT</p> <p>AS4: Moderate, adverse - SIGNIFICANT</p>				<p>AS2: Moderate / Major, adverse: SIGNIFICANT</p> <p>AS3 : Moderate / Major, Adverse- SIGNIFICANT</p> <p>AS4: Moderate, adverse - SIGNIFICANT</p>
Adjoining Landscape Character Receptors						
<p>Those parts of LCA SDC-11: Lympe that are outside of the Application Site Boundary</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space 	<p>AS1: Moderate, adverse: NOT SIGNIFICANT</p> <p>AS2: Moderate, adverse: NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate, adverse: NOT SIGNIFICANT</p> <p>AS2: Moderate, adverse: NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 					
<p>Those parts of LCA SDC-11: Lypne that are outside of the Application Site Boundary</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1: Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Major, adverse - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - SIGNIFICANT</p> <p>AS4: Moderate, adverse - NOT SIGNIFICANT</p>	<p>C & O</p>	<p>Further structural planting</p>	<p>Planning Condition</p>	<p>AS1: Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Major, adverse - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - SIGNIFICANT</p> <p>AS4: Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>SDC-06: Stanford</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1: Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>SDC-09: Sellindge</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges 	<p>AS1: Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Minor / Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS3: Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4: Minor / Moderate, adverse - NOT SIGNIFICANT</p>				<p>AS3: Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4: Minor / Moderate, adverse - NOT SIGNIFICANT</p>
<p>SDC-09: Sellindge</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space 	<p>AS1: Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 					
<p>SDC-12: Brockhill</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Minor / Moderate - NOT SIGNIFICANT</p> <p>AS4: Minor / Moderate - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Minor / Moderate - NOT SIGNIFICANT</p> <p>AS4: Minor / Moderate - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>SDC-13: Greensand Ridge</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>
<p>ABC-10: East Stour Valley</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse- NOT SIGNIFICANT</p>				<p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse- NOT SIGNIFICANT</p>
Other Landscape Character Receptors away from the boundary of the site						
<p>SDC-05: Postling Vale</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space 	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 :Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse -</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 :Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse -</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 					
<p>SDC-05: Postling Vale</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1: Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>SDC-07: Tolsford Hill</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting 	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Non-cumulative Assessment	<ul style="list-style-type: none"> - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse - NOT SIGNIFICANT</p>				<p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Moderate / Minor, adverse - NOT SIGNIFICANT</p>
SDC-07: Tolsford Hill Cumulative Assessment	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character 	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS4 :Moderate / Minor, adverse - NOT SIGNIFICANT</p>				<p>AS4 :Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>SDC-08: North Downs Ridge Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Minor /Moderate, adverse - NOT SIGNIFICANT</p>	<p>C & O</p>	<p>Further structural planting</p>	<p>Planning Condition</p>	<p>AS1: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3: Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4: Minor /Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>SDC-21: Romney Marsh Proper Farmlands</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>
<p>ABC-25: Aldington Ridgeline</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS3 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p>				<p>AS3 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p>
<p>ABC-25: Aldington Ridgeline Cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p>	<p>C & O</p>	<p>Further structural planting</p>	<p>Planning Condition</p>	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 					
<p>ABC-29: Evegate Mixed Farmlands</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>
<p>ABC-30: Brabourne Arable Farmlands</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting 	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Non-cumulative Assessment	<ul style="list-style-type: none"> - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>				<p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>
ABC-30: Brabourne Arable Farmlands Cumulative Assessment	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety 	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>				<p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>
<p>ABC-31: Brabourne Farmlands Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>	<p>C & O</p>	<p>Further structural planting</p>	<p>Planning Condition</p>	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>ABC-AONB-01 Postling Vale - Stowting</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>ABC-AONB-01 Postling Vale - Stowting</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>				<p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>ABC-AONB-02 East Kent Downs - Petham</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space 	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 					
<p>ABC-AONB-02 East Kent Downs - Petham</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor - NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor - NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate - NOT SIGNIFICANT</p>
<p>ABC-AONB-03 Lympne - Aldington</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility 	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Non-cumulative Assessment	<ul style="list-style-type: none"> - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>				<p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>
ABC-AONB-04 Lympne - Hythe Escarpment Non-cumulative Assessment	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control 	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate,</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate,</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	adverse - NOT SIGNIFICANT				adverse - NOT SIGNIFICANT
<p>ABC-AONB-05 Lympne - Romney Marsh</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>ABC-AONB-06 Stour Valley – Hampton</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse: - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse – NOT SIGNIFICANT</p>	<p>C & O</p>	<p>Further structural planting</p>	<p>Planning Condition</p>	<p>AS1 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse: - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse – NOT SIGNIFICANT</p>
<p>ABC-AONB-06 Stour Valley – Hampton</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse: - NOT SIGNIFICANT</p>	<p>C & O</p>	<p>Further structural planting</p>	<p>Planning Condition</p>	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse: - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse – NOT SIGNIFICANT</p>				<p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse – NOT SIGNIFICANT</p>

Notes: Construction = C, Operation = O

Table 12-27 Visual Character Impact Assessment Summary

Definitions:

AS1 = Assessment scenario 1: Peak Construction Year

AS2 = Assessment scenario 2: Year 0 following completion– Operation Year 0

AS3 = Assessment scenario 3: Year 15 following completion – Operation Year 15

AS4 = Assessment scenario 4: Year 30 following completion – Operation Year 30

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Public Rights of Way through the Site						
Public Rights of Way through the Site Non-Cumulative Assessment	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive layout detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes 	<p>AS1: Moderate / Major Adverse - SIGNIFICANT</p> <p>AS2: Moderate / Major Adverse - SIGNIFICANT</p> <p>AS3: Moderate Adverse - SIGNIFICANT</p> <p>AS4: Moderate Adverse - SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1: Moderate / Major Adverse - SIGNIFICANT</p> <p>AS2: Moderate / Major Adverse - SIGNIFICANT</p> <p>AS3: Moderate Adverse - SIGNIFICANT</p> <p>AS4: Moderate Adverse - SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 					
Public Rights of Way Outside the Site						
<p>Users of localised / close range PRoW, within 2km to the south of site</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate - NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>Users of localised / close range PRow, within 2km to the west of the site</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Major - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS2 = Moderate / Major - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>
<p>Users of localised / close range PRow, within 2km to the north of the site</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing 	<p>AS1 = Moderate, adverse - SIGNIFICANT</p> <p>AS2 = Moderate / Major - SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse - SIGNIFICANT</p> <p>AS2 = Moderate / Major - SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Non-cumulative Assessment	<ul style="list-style-type: none"> - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>				<p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>Users of localised / close range PRoW, within 2km to the north of the site</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control 	<p>AS1 = Moderate / Major, adverse - SIGNIFICANT</p> <p>AS2 = Moderate / Major - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Major, adverse - SIGNIFICANT</p> <p>AS2 = Moderate / Major - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 					
<p>Users of localised / close range PRoW, within 2km to the east of the site</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	- Area-specific Embedded Design Measures					
Users of intermediate / medium range PRow, between 2-5km to the west of the site Non-cumulative Assessment	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>
Users of intermediate / medium range PRow, between 2-5km to the north of the site	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Non-cumulative Assessment	<ul style="list-style-type: none"> - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>				<p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>Users of intermediate / medium range PRoW, between 2-5km to the north of the site</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 					
National Trails and Long Distance Paths						
<p>Users of the North Downs Way, National Trail</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Moderate, adverse – SIGNIFICANT</p> <p>AS2 = Moderate / Major, adverse - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – SIGNIFICANT</p> <p>AS2 = Moderate / Major, adverse - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>Users of the North Downs Way, National Trail</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Moderate / Major, adverse – SIGNIFICANT</p> <p>AS2 = Moderate / Major, adverse - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Major, adverse – SIGNIFICANT</p> <p>AS2 = Moderate / Major, adverse - SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>
<p>Users of the Saxon Shore Way, Long Distance Path</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form 	<p>AS1 = Moderate / Major, adverse – SIGNIFICANT</p> <p>AS2 = Moderate / Major, adverse - SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>				
Outdoor Recreational Areas						
<p>Users of Open Access Land (OAL) upon the North Downs scarp slopes within intermediate / medium range</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 					
<p>Users of Open Access Land (OAL) upon the North Downs scarp slopes within intermediate / medium range</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse - SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>Users of Open Access Land (OAL) (including Peene Country Park) upon the North Downs scarp slopes within long range</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>
<p>Users of Lympne Airfield</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse -</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse -</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Further Space for Green Infrastructure - Blue Infrastructure Proposals - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>				<p>NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>Users of Westenhanger Castle</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, neutral – NOT SIGNIFICANT</p> <p>AS3 = Moderate, beneficial - NOT SIGNIFICANT</p> <p>AS4 = Moderate, beneficial - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, neutral – NOT SIGNIFICANT</p> <p>AS3 = Moderate, beneficial - NOT SIGNIFICANT</p> <p>AS4 = Moderate, beneficial - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Further Space for Green Infrastructure - Blue Infrastructure Proposals - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 					
<p>Users of Port Lympne Animal Park</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Further Space for Green Infrastructure - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation 	<p>AS1 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	- Area-specific Embedded Design Measures					
Users & Residents of Existing Settlements						
Users and residents of Lympne Non-cumulative Assessment	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Further Space for Green Infrastructure - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor/ Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>Users and residents of Westenhanger</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Further Space for Green Infrastructure - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Major, adverse – SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>	<p>C & O</p>	<p>Further structural planting</p>	<p>Planning Condition</p>	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Major, adverse – SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>Users and residents of Newingreen</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Further Space for Green Infrastructure - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>Users and residents of the settlement of Barrow Hill</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Non-cumulative Assessment	<ul style="list-style-type: none"> - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Further Space for Green Infrastructure - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS2 = Moderate, adverse –NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>				<p>AS2 = Moderate, adverse –NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>
Users and residents of Stanford Non-cumulative Assessment	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form 	<p>AS1 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>				<p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>
<p>Users and residents of Court-at-Street</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area 	<p>AS1 = Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse –NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Minor / Moderate, adverse –NOT SIGNIFICANT</p> <p>AS3 = Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 					
<p>Users and residents of Aldington Church</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Area-specific Embedded Design Measures 	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>Users and residents of Brabourne</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character 	<p>AS1 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse –NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse –NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Character Area Diversity and Distinction - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>				<p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>
<p>Users and residents of Sellindge</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space 	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	<p>C & O</p>	<p>Further structural planting</p>	<p>Planning Condition</p>	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 					
<p>Users and residents of Sellindge</p> <p>Cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Measures to Reduce Reliance on Existing Public Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Retention of Public Rights of Way Routes - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse –NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Residents Outside Settlements						
<p>Individual Residential Properties: inside the application boundary, and which would be demolished by the end of the construction period</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Major / Moderate, adverse – SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Major / Moderate, adverse – SIGNIFICANT</p>
<p>Individual Residential Properties along the A20 to be retained (or whose</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles 	<p>AS1 = Moderate/ Major, adverse – SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate/ Major, adverse – SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>demolition cannot be decided until the further tiered planning stages) and - generally enclosed by the proposed Development</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS2 = Moderate/ Major, adverse – SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>				<p>AS2 = Moderate/ Major, adverse – SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>
<p>Individual Residential Properties along or near to Stone Street, Westenhangar to be retained (or whose demolition cannot be decided until the further tiered planning</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety 	<p>AS1 = Major / Moderate, adverse – SIGNIFICANT</p> <p>AS2 = Major / Moderate, adverse – SIGNIFICANT</p> <p>AS3 = Moderate / Major, adverse - SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Major / Moderate, adverse – SIGNIFICANT</p> <p>AS2 = Major / Moderate, adverse – SIGNIFICANT</p> <p>AS3 = Moderate / Major, adverse - SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>stages) and which are generally enclosed by the proposed Development</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS4 = Moderate, adverse - SIGNIFICANT</p>				<p>AS4 = Moderate, adverse - SIGNIFICANT</p>
<p>Individual Residential Properties to be retained (or whose demolition cannot be decided until the further tiered planning stages) and which are only partially enclosed by the proposed Development</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments 	<p>AS1 = Moderate / Major, adverse – SIGNIFICANT</p> <p>AS2 = Major/ Moderate, adverse – SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>	<p>C & O</p>	<p>Further structural planting</p>	<p>Planning Condition</p>	<p>AS1 = Moderate / Major, adverse – SIGNIFICANT</p> <p>AS2 = Major/ Moderate, adverse – SIGNIFICANT</p> <p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 					
<p>Individual Residential Properties, outside, but in the immediate environs of the application site and, to be retained</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Sensitive Consideration of Building Heights - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Improved Integration of Heritage in the Landscape - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS3 = Moderate / Minor, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate / Minor, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
Highways & Associated Areas						
<p>Users of Junction 11 of the M20 and the adjacent Service Station</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – NOT SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>
<p>Users of roads through the site including the A20, Stone Street and</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles 	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Major, adverse – SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Major, adverse – SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
<p>Otterpool Lane</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 	<p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>				<p>AS3 = Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Moderate, adverse - NOT SIGNIFICANT</p>
<p>Users of roads within 0-2km of the site including Hythe Road, Stone Street, Aldington Road, Harringe Lane, Kennet Lane</p> <p>Non-cumulative Assessment</p>	<ul style="list-style-type: none"> - No Substantial Landform Change - A Topography-responsive Design - A Landscape-responsive Layout - Robust Defensible Edges - Sensitive Land Use Siting - Sensitive Layout Detail - Clear Settlement Legibility - Deliberate Diversity in Building Styles - Visually Considerate Orientation and Positioning - Visually Considerate Built Form Massing - Visually Considerate Architectural Form - Gradation of Density Towards the Development's Edges - Diversity in Density to Accentuate Settlement Legibility and Character - Character Area Diversity and Distinction - Creating Intimate Visual Character and Variety - Local Vernacular Character - Lighting Control 	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>	C & O	Further structural planting	Planning Condition	<p>AS1 = Minor / Moderate, adverse – NOT SIGNIFICANT</p> <p>AS2 = Moderate / Minor, adverse – SIGNIFICANT</p> <p>AS3 = Minor / Moderate, adverse - NOT SIGNIFICANT</p> <p>AS4 = Minor / Moderate, adverse - NOT SIGNIFICANT</p>

Receptor	Embedded Design Measures (see full description in section 12.4)	Potential Significant Effect (pre-mitigation)?	Phase	Additional Mitigation	Mitigation delivery mechanism	Residual Effect Significance
	<ul style="list-style-type: none"> - Lighting Mitigation Measures - Reflectivity Reduction Measures - Substantial Proportion of Open Space - Improvements to Aspects of the Intrinsic Landscape Character of the Area - Structural Planting Mitigation Commitments - Considerate Access through Existing Structural Vegetation - Area-specific Embedded Design Measures 					

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