

Landscape Proof of Evidence

In Respect of: Land North of the A20, Ashford Road,
Hollingbourne, Kent.

On behalf of Wates Developments

Date: 11th December 2023 | Pegasus Ref: P21-3456

LPA Ref: 23/500899/OUT

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1. Witness Background and Particulars

- 1.1. My name is Andrew Cook and I hold a Bachelor of Arts degree in Geography (BA Hons) and a Masters Degree in Landscape Design (MLD). I am a Chartered Landscape Architect, Chartered Member of the Landscape Institute (CMLI), Chartered Environmentalist (C Env) and Member of the Institute of Environmental Management and Assessment (M IEMA).
- 1.2. I am one of the founding Executive Directors of Pegasus Group which was established in 2003. Since then, the company has grown, establishing sixteen offices across the UK, employing approximately 400 planning and environmental planning professionals. I jointly head the environmental planning division in which planning for residential and commercial development accounts for a significant part of the business. I registered the company as a corporate member of the Institute of Environmental Management and Assessment (IEMA) as a founding member of IEMA's Quality Mark scheme.
- 1.3. I have gained over 35 years of landscape planning consultancy experience. Prior to Pegasus, I was an Environmental Director at RPS (formerly Chapman Warren Planning Consultants) where I specialised in addressing landscape planning issues which related to a wide range of development projects. I have had considerable experience of and involvement in a wide range of employment development and built infrastructure projects throughout the UK, many of which have involved sites in sensitive locations such as statutory protected landscapes including National Parks (NP), Areas of Outstanding Natural Beauty (AONB) as well as non-statutory landscape designations such as a Special Landscape Areas (SLAs) and gaps, as 'valued landscapes'. I have presented evidence at public inquiries on many occasions to address various landscape and visual issues.
- 1.4. I am based in the Cirencester office of Pegasus where I manage a team of 22 environmental planners and landscape architects. I and the landscape architects within my team at Pegasus undertake their work in compliance with the Landscape Institute's Code of Standards of Conduct and Practice for Landscape Professionals (May 2012).
- 1.5. This landscape proof of evidence is based on my own professional judgement and is presented in accordance with the guidance of my professional institution, the content of which is true to the best of my knowledge and belief and is presented irrespective of by whom I am instructed.

2. Introduction and Scope of Landscape Evidence

2.1. I am instructed on behalf of Wates Developments ('the Appellant') to present evidence relating to landscape and visual matters in respect of the Public Inquiry relating to an application for outline planning permission which was submitted to Maidstone Borough Council and validated on 9th March 2023. The application proposed the following:

"Outline application for the erection of a building for storage and distribution (Class B8 use) with a floor space up to 10,788sqm (Gross external area) ancillary offices, associated car parking, HGV parking, landscaping and infrastructure (All matters reserved except for access)."

2.2. The planning application that is now the subject of this appeal was submitted to Maidstone Borough Council (LPA ref: 23/500899/OUT) and refused.

2.3. My Landscape Proof of Evidence comprises separate appendices as listed. This evidence should also be read in conjunction with the Planning Proof of Evidence prepared by Asher Ross. I have been involved in the planning application with my colleague Jon Evans who prepared the LVIA under my supervision and was involved in the determination stage. I provided initial advice as to the suitability of the site to accommodate B8 use development. I have visited the site on several occasions and familiar with its landscape context. I am able to support the proposed appeal scheme and I therefore formally accepted the instructions regarding this appeal.

Scope of Evidence

2.4. There are 3 reasons set out in the Planning Decision Notice the second one of which is landscape visual matters, which states that:

"The development would cause significant harm to the character and appearance of the countryside and landscape within the local area through its site coverage and scale, further consolidation of development and urbanisation in the vicinity, and prominence in local views. It would also have a significant adverse impact on the setting of the Kent Downs in views towards the scarp slope from Old Mill Road to the south. This would be contrary to policies SP17(1) and (4) and DM20(ii) of the Maidstone Borough Local Pla 2017, policy SD8 of the Kent Downs AONB Management plan and paragraphs 174(a) and (b) and 176 of the NPPF."

2.5. Accordingly, the following matters are considered within my landscape proof of evidence with regard to the alleged harm set out in the second Reason for Refusal. The proposed development in itself is alleged to harm the:

- Character of the countryside
- Appearance of the countryside
- Landscape within the local area
- Prominence in local views
- Setting of the AONB in views from Old Mill Road

2.6. Careful reading of the second reason for refusal notes alleged harm from the development upon the local area with regard to character and appearance. There is also reference to the setting of the AONB but this is solely in respect to views towards the scarp slope itself within the AONB and from one visual receptor namely the Old Mill Road. These particular aspects I focus on in my proof. I note that the AONB Board have raised the issue of setting with regards to the AONB and views from this designation.

2.7. My proof sets out my analysis and professional judgement with regard to this matter noting that in overall terms, the proposal would not cause significant harm to the setting of the AONB and that, having regard to mitigation, effects upon character and appearance would be both limited and highly localised in the context of the site and neighbouring development.

2.8. I note that the site and the proposals have been carefully considered by the applicant, such that the application scheme I consider would be suitable given its location and current development and that the landscape and visual effects arising from this proposal are not considered unacceptable, mindful of the AONB and the local landscape.

2.9. In preparing my evidence, I have reviewed a number of documents, the principal ones of which include the following:

- Application LVA
- Case Officer's Report
- Landscape Consultation Responses
- Planning Proof of Evidence prepared by Asher Ross
- Relevant landscape reports
- Design and Access Statement
- Application Planning Statement

- Relevant Planning Policies
- Statement of Common Ground
- Kent Downs AONB Management Plan (2021–2026)
- Other documents but not necessarily referenced here

2.10. Where appropriate, I draw upon relevant information from these documents and seek to avoid unnecessarily repeating the same information and therefore I have summarised my analysis.

2.11. As part of my instructions I have undertaken a review of the LVIA which was submitted as part of the planning application, together with other supporting documents and also assessed the scheme with reference to the LVIA viewpoints surrounding the site together with the application visuals that illustrate the appearance of the scheme.

2.12. Notwithstanding the LVIA's findings, I have undertaken my own assessment regarding the character and appearance of the local landscape and with regard to the setting of the AONB to inform my professional judgements. Consequently, as an individual landscape professional, I have come to some different conclusions to that set out in the LVIA which is not unusual as rehearsed in GLVIA3. I consider that the proposal would result in effects ranging from adverse to beneficial where relevant and as stated. I would also note that as far as my analysis is concerned, my appraisal has been undertaken against the baseline of the nearby employment uses and planning consents, including the remaining undeveloped part of the adjacent allocation.

2.13. The analysis that I have undertaken has allowed me to consider the landscape and visual effects with reference to the issues raised in the second Reason for Refusal and to make informed professional judgements concerning such matters. Within the scope of my area of expertise I assess whether the level of harm is deemed to be acceptable or otherwise from a landscape and visual perspective, mindful that the planning balance is for the planning witness.

Representative Viewpoints and Visualisations

2.14. I consider that the LVIA photographs have been taken from a number of representative viewpoints in the landscape surrounding the site, both in terms of views of the local and surrounding countryside. It is anticipated that the Inspector would visit these representative

viewpoints set out in the LVIA as an aide memoire. It is also understood that the Council accept that such viewpoints are indeed representative.

2.15. It should be recognised that it is not practical to include viewpoints from every possible location. The LVIA viewpoints which have been selected, illustrate a range of visual receptors at different distances and directions from the site, often representative of a kinetic sequential viewing experience, which is obviously best judged on site. The locations of the viewpoints have been carefully considered and the photography has been undertaken when atmospheric conditions and visibility were good. The photography is considered appropriate given the type and scale of development. The representative viewpoints and visualisations have been prepared in accordance with the Guidelines for the Landscape and Visual Impact Assessment (3rd Edition) ('GLVIA') and Landscape Institute ('LI') guidance relevant at the time of production, however, it is recognised that there is no substitute for visiting the viewpoints in the field to gain a first-hand appreciation of the viewing context.

2.16. I also note that as an LVIA was prepared for the application, with this information, the Case Officer was fully informed as to the landscape and visual implications of the proposal as these relate to the character and appearance of the local area and setting.

Rule 6 Parties

2.17. I am aware that the Kent Downs AONB Unit are a Rule 6 Party to this Inquiry and I have read their Statement of Case, noting that their concerns transcend the concerns of the Council, with regard to views out of the AONB and specifically viewpoint 12.

Professional Judgement and Nature of Effect

2.18. Mindful of the GLVIA 3rd Edition, I have reviewed the scheme based on the viewpoints as part of my fieldwork and site visit. This has allowed me to ascertain the landscape and visual effects and make informed professional judgements concerning such matters and establish the level and nature of effect from a landscape and visual perspective. My assessment is based on winter views, given the Inquiry timetable, however, I have been mindful of summer views in my analysis. I note that the Inspector will experience winter views on site. My analysis is based on year 1 following planting and winter views. I refer to year 15 where appropriate to assess the effect of maturation of the mitigation planting (Revision E), see appendix 8.

2.19. The degree of landscape or visual effect is identified by means of a descriptive scale in accordance with GLVIA 3rd Edition.. However, it is also necessary to consider the nature of the landscape and visual effects.

2.20. GLVIA assists noting with regard to landscape effects paragraph 5.37 states that:

“One of the more challenging issues is deciding whether the landscape effects should be categorised as positive or negative. It is also possible for effects to be neutral in their consequences for the landscape. An informed professional judgement should be made about this and the criteria used in reaching the judgement should be clearly stated. They might include, but should not be restricted to:

The degree to which the proposal fits with existing character

The contribution to the landscape that the development may make in its own right, usually by virtue of good design, even if it is in contrast to existing character.

The importance of perceptions of landscape is emphasised by the European Landscape Convention, and others may of course hold different opinions on whether the effects are positive or negative, but this is not a reason to avoid making this judgement, which will ultimately be weighed against the opinions of others in the decision-making process.” (my emphasis)

2.21. With regard to visual effects paragraph 6.29 states that:

“As with landscape effects an informed professional judgement should be made as to whether the visual effects can be described as positive or negative (or in some cases neutral) in their consequences for views and visual amenity. This will need to be based on a judgement about whether the changes will affect the quality of the visual experience for those groups of people who will see the changes, given the nature of the existing views.” (my emphasis)

2.22. In this instance and for the purposes of this proof, the effects upon the landscape are specifically considered in terms of effect upon firstly landscape elements and secondly landscape character. My proof also sets out how the proposal would have a bearing upon the general visual amenity associated with the area. The proposed scheme, I regard as an appropriate high quality scheme which is consistent with the character of employment use and built infrastructure in the locality. Similarly, the proposed landscape mitigation, functioning as green infrastructure across the site, would be in character and in keeping with the area. I consider that the overall landscape mitigation design would form an attractive green infrastructure which would be beneficial in nature in itself regarding both landscape and visual effects.

2.23. However, I am aware that people on the whole generally adopt an adverse reaction to change, particularly with regard to their local environments with which they are very familiar. It is my professional judgement that the scheme would be in keeping with the character and appearance of the locality, and that the proposed green infrastructure would be beneficial in landscape terms though the built form I would regard as being adverse in terms of nature of effect. In terms of the scheme as a whole, therefore, adopting a precautionary approach, I consider that the overall effects would be adverse with regard to the nature of effect concerning landscape character and visual amenity (views) and with regard to the setting of the AONB.

Baseline Situation

2.24. The land immediately to the north-west of the site is currently under development having previously been farmland. The development is referred to as Loc 8 and called Woodcut Farm on Ashford Road. This is an employment development which accommodates a number of buildings of various sizes across the site including offices and B1 use but has not been designed to accommodate larger B8 logistics use. The majority of this development is near completion in terms of construction with the last part of the development still to be constructed in the south-eastern corner of the site, contiguous with the appeal site. The majority of the buildings are complete in terms of their construction and evident in the photographs and photomontages. A further building as proposed as part of the Woodcut Farm scheme has been included (as a massing model) in some photomontages from Old Mill Road to indicate the complete development in visual terms for visual purposes.

2.25. The Inspector commented on the local landscape character of the area with regard to the proposed development at White Heath at Ashford Road. At internal paragraph 8, the Inspector's Report (IR) notes the surroundings are dominated by the road network which carries large volumes of fast moving traffic. The A20 (Ashford Road) passing the front of the site and connecting with junction 8 of the M20 at the rear are significant infrastructure features. The IR goes on to note at paragraph 14 that it is of relevance that the Local Plan identifies the area as being one for significant change resulting from the allocation of the land around the site at Woodcut Farm for a large-scale mix employment use. Outline planning permission has been given. This is likely to extensively change the character of the area and also bring with it more activity. At internal paragraph 21, the IR notes when regard is paid to the changing context of the area around the site resulting from the development at Woodcut Farm, a three storey building of the scale proposed would not be harmful to the character of

the area. There is a reasonable prospect that a landscape scheme would assist with assimilating the development into its surroundings. Paragraph 22 notes the site is open to distant views from the AONB. Trees and other landscaping at the rear boundary of the site would serve to limit the perceived scale of the proposed development and provide an element of screening that would reduce its overall impact. As such, the natural beauty of the AONB would be conserved.

Local Landscape Character Baseline Context

- 2.26. There are a number of recent planning permissions that relate to the immediate locality. I comment upon the relevant Officers' Reports where these relate to landscape and visual matters.
- 2.27. With regard to planning application reference number 21/506792/HYBRID I note the following observations. This application was for a mixed commercial scheme at Woodcut Farm. In the OR summary it notes that the proposed development would result in a low level of harm to the character and appearance of the area and that the impacts of the development would be localised and seen in the context of the approved allocated site and would represent an infill. Permission was recommended.
- 2.28. The proposed development included a three storey office building to the front and a B8 use building to the rear. The Report noted in close range views from the A20, the front building would be most prominent due to its location. In long range views from the AONB due to the distance and the effect of intervening landform and vegetation, the two buildings would not have any significantly different impact beyond the development compared to the approval on the surrounding employment site. The Report goes on to note at paragraph 6.23 that the Case Officer has carefully considered views of Natural England and the Kent Downs AONB Unit but did not agree that the proposed expansion of the site would cause harm to the setting of the AONB. The Report goes on to note at paragraph 6.24, the impact of the development would be localised and seen in the context of the approved development surrounding it. It would, however, increase visible development and cause some harm though it was considered that this would be a low level of harm to the character and appearance of the countryside.
- 2.29. With regard to planning application reference number 21/506791/REM I note the following observations. This is a Reserved Matters application for development including B8

employment and flexible Class Use E (g). The Officer's Report notes that it is considered that the site falls within the setting of the AONB. Kent Downs AONB Unit strongly objected to the proposal with no comments from Natural England. With regard to appearance, the Report noted limited visual impact including through use of non-reflective materials, sensitive colouring, green roofs and walls and sensitive lighting proposals. The building should include active frontage elements incorporating glazing and address both the A20 and the M20. The Case Officer recommended permission.

- 2.30. With regard to planning application reference number 23/502387/REM I note the following observations. The Officer's Report notes the proposal relates to a number of buildings for B8 use including ancillary offices. The Report notes that the conflict with the site policy was assessed and judged to be acceptable in terms of the impact upon the local landscape and setting of the AONB under these applications. Permission was recommended.
- 2.31. With regard to planning application reference number 20/505182/REM I note the following observations. This application relates to a Reserved Matters application for phase 1 of Woodcut Farm. In the summary the report notes that the proposed levels strike an acceptable balance between lowering buildings and development to limit its impact upon the setting of the AONB and local landscape and having suitable levels changes in and around the site. The Kent Downs AONB strongly objected to the proposals. At paragraph 7.10, the Officer's Report refers to photomontages and notes that in long distance views the development would not be significantly harmful or intrusive from the AONB. In more localised views they demonstrate that the strategic landscaping outside of the development would largely screen and/or break up views of the development. Furthermore, the Case Officer noted that the proposed layout was not considered to be unacceptable or to result in a materially different impact from the AONB or one that would have a significant adverse impact on its setting. The Officer's recommendation was for approval.
- 2.32. With regard to planning application reference number 20/505195/OUT I note the following observations. This proposal relates to a section 73 application to vary Conditions of the outline permission which control the size, height and orientation of the buildings. Natural England raised objections to the application. At paragraph 7.30, the Report notes that the proposed changes would not be of a magnitude that would result in a materially different impact to the setting of the AONB compared to the approved permission. The proposals would also not have a significant adverse impact on the setting of the AONB. At paragraph

8.01, the Report notes the proposed changes would have a slightly greater impact above the approved permission. However, it was considered that the changes would not make any obvious noticeable difference in views from the AONB due to the distance and/or the effect of intervening landform and vegetation. In more localised views to the south, the changes would be more apparent but would not make such a difference that the impact upon the landscape and local area would be unacceptable in the context of the site being allocated and the extant permission.

- 2.33. With regard to planning application reference number 17/502331/OUT I note the following observations. This is an outline application for a mixed commercial development comprising B1 and B8 uses with a maximum floor space of 45,295sqm and was recommended for approval. Natural England raised an objection to the proposal in terms of impact on the AONB. At paragraph 6.23, the Officer's Report notes in localised views from the A20, M20 and Old Mill Lane around 400m to the south, the development would inevitably have a significant impact and it would also be seen in views towards the AONB from Old Mill Lane and the A20 to the south which would be harmful to its setting. The Report notes in conclusion, the application can take into account the appropriate landscaping mitigation, the details of which would be dealt with under any Reserved Matters application. The Officer recommended that planning permission should be approved.

Description of the Site and Its Development Context

- 2.34. The site currently comprises a single arable field which is broadly triangular in shape with access to this field is by means of the A20 Ashford Road.
- 2.35. The land immediately to the north of the site is currently under construction to create a new employment site know as Woodcut Farm, (this is a commercial development and is a Local Plan Allocation Site under EMP1 (4) of the Local Plan 2017). The appeal site is 2.88ha in area. Its topography is gently sloping form east to west and has no vegetation such as trees and hedges within the site though tree cover and hedgerows currently frame the site on land beyond the red line. The site lies beyond the Len Valley Landscape of Local Value (LLV) which extends as far north as the A20. The site also lies outside the North Downs AONB which at its closest point is over 0.5km to the north though the site is considered to fall within the setting of this AONB in terms of intervisibility.

- 2.36. Also lying to the north and north-east of the site is the M20 motorway and junction 8 providing full access and associated slip roads to connect with the adjacent A20 Ashford Road. Immediately to the north of this roundabout junction and connecting to it is a large scale motorway service area including a range of facilities together with hotel accommodation (Days Inn), petrol filling station and together with various retail concessions and charging stations. A separate lorry park also lies within this area. This MSA is framed to the north by a rail line which connects Maidstone to the west with Ashford to the east. North of this rail infrastructure lies the Kent Downs AONB with this rail line forming the southern boundary to the AONB designation in this locality. Further west of the MSA, known as Maidstone Services the rail line crosses the M20 motorway at which point the motorway continues to define the southern boundary of the AONB.
- 2.37. Immediately to the east of the site lies the dual carriageway linking the A20 to the M20 junction and is framed by embankments and cuttings which are planted with maturing woodland.
- 2.38. Immediately to the south of the site lies the A20 Ashford Road and an associated roundabout junction together with dual carriageway further east. Immediately to the south of this junction lies a commercial site with access off Old Mill Road. Old Mill Road itself is effectively a single lane road which is broadly orientated north-south and connects into Ashford Road at its northern end, and at its southern end connects with Forge Lane by means of a T-junction close to Leeds Village extending over a distance of a kilometre.
- 2.39. To the south-west the site is bounded by the A20 Ashford Road which is a two lane carriageway and further south of which lies a series of fields primarily pastoral use, which formerly formed part of the Leeds Langley safeguarded area for strategic development. Also located to the west of the site is a large complex known as Bearsted Caravan Club site with pitches and various facilities adjacent to new office premises fronting onto and directly accessed off Ashford Road. West of the site the countryside is punctuated with sporadic linear residential development comprising large curtilages and has a suburban appearance alongside golf course landscapes and further hotel complexes including The Marriott accessed off Ashford Road.
- 2.40. In overall terms, the site is significantly influenced by the presence of built and road infrastructure in the immediate locality. This is reinforced by the associated use of the roads

with high levels of traffic generating both noise, movement and lighting. High level lighting columns also feature heavily in the locality in the night-time scene.

Case Officer's Report to Committee

- 2.41. A Delegated Report, dated June 2023 was prepared by the Case Officer (CO) Richard Timms. Unhelpfully the report is neither paginated nor paragraphed referenced though I proceed to refer to it in that context.
- 2.42. In terms of local representations, the local residents' concerns did not raise any issues with regards to local character and the only landscape and visual point raised was concern relating to visibility from one public right of way known as the North Downs Way located in the AONB, with no reference to harm to visual amenity with regard to the A20 Ashford Road nor the country lane, Old Mill Road further south.
- 2.43. The Officer's Report (OR) refers to Ward Councillor Garten and quotes that the Woodcut Farm site and notes that regards to the neighbouring AONB mitigation proposed is considered to be quite successful with regard to that adjacent scheme.
- 2.44. The OR notes no objection from Natural England i.e. no material concern with regard to harm to the AONB.
- 2.45. The Maidstone Borough Council's own Landscape Office advised that the landscape scheme should be more native in design with regard to plant species. I address this matter separately in Section 3 of my proof with regard to landscape modifications to the appeal proposals.
- 2.46. The OR notes that the Kent Downs AONB Unit strongly objects to the proposal specifically referencing harm to the setting of the AONB.
- 2.47. The Officer's Report notes LPA LVIA Consultant cross referred to his report.
- 2.48. The policy context is addressed and refers to Policy SP1 with regard to employment and the Woodcut Farm allocation.
- 2.49. A section addresses impact on the character and appearance on the area and notes that the site falls within the setting of the Kent Downs AONB due to proximity and because the site can be seen in the context of the scarp slope of the AONB itself, a key characteristic when viewed from the south. Policy SP17 states proposals should not have a significant adverse

impact on the setting and refers to the NPPF paragraph 176 (former NPPF) where development within the setting should be sensitively located and designed to avoid or minimise adverse impact (my emphasis).

- 2.50. The OR goes on to note that the A20 and the M20 are urbanising features in the local area as is the Woodcut Farm development.
- 2.51. The OR goes on to refer to Woodcut Farm development noting these building will be set back from the road (by that I'm assuming the A20) by 25–40m with landscaping in front and that it is inevitable that that development will change the character of this part of the A20 noting that the largest buildings are highly visible from the A20 though this impact will reduce in time once landscaping at the site matures, taking a number of years. The report also refers to recent built commercial buildings on the south side of the A20. Furthermore, east of the site lies the A20 roundabout, low scale sporadic development with the exception being the Great Danes Hotel with reference to this being set back from the A20.
- 2.52. The OR refers to the Council's Landscape Character Assessment 2013 update noting the site falls within the Leeds Castle Parklands Landscape Character Areas and White Heath farmlands which notes the condition of which is poor and its landscape sensitivity moderate with overall guidelines to restore and improve.
- 2.53. The OR notes that the area has and will continue to change since the 2013 update assessment with the introduction of Woodcut Farm introducing more urbanisation of the local landscape. The CO notes that Woodcut Farm will never be fully hidden though harm to character and appearance of the countryside will be mitigated by landscaping. The CO notes the site forms the last remaining field on the north side of the A20 in the character area.
- 2.54. The CO refers to the development introducing a large building up to 15m high and goes on to note that commercial buildings at Woodcut Farm means that it could be said the proposal is not entirely out of character. The report goes on to note that the Woodcut Farm buildings and any parking areas are set back from the A20 with the buildings set back. The OR notes that the size of the site means that similar buffers and robust planting are not possible and therefore the proposals would be out of character with the consented buildings in the vicinity.
- 2.55. The OR refers to the 2017 Local Plan Inspector noting that the proposed allocation at Woodcut Farm would cause harm to the character and appearance of the local area including



the setting of the AONB and that mitigation would be unlikely to negate all of the adverse impact though the deemed harmful development was allowed.

2.56. The OR refers to the Council's LVIA Consultant (Peter Radmall Associates) noting that the moderate adverse impact on the landscape character was a reasonable conclusion. The OR concluded that the development caused harm to the character to the local area and landscape (my emphasis) and would result in the loss of the last undeveloped field north of the A20.

2.57. The OR notes that the Case Officer undertook his own assessment of visual impact based on the viewpoints to form his conclusions which are summarised as follows:

- Effect on localised views where development will be highly visible and prominent in close proximity to the A20 and from the flyover and from Old Mill Road within 400m of the site to the south and that development would have a significant visual impact from these viewpoints (my emphasis).
- Potential landscaping shows limited space for planting and only space for a single line of trees along the west and south boundaries which would not sufficiently mitigate visual impacts seen from the A20 and flyover.

2.58. I address these specific points in later sections of my proof.

2.59. The OR specifically addresses the setting of the Kent Downs AONB. It notes that from Old Mill Road public footpath KH180 to the south, the development would be seen with the backdrop of the AONB scarp slope and has such it would have a significant harmful impact on the setting of the AONB when seen from this viewpoint (my emphasis). Furthermore, the CO notes that the proposals would consolidate and extend development to the east of the allocation within the setting and that potential landscaping would not be sufficient to mitigate the visual impact on the setting of the AONB.

2.60. It is noted that in more distant viewpoints from the south (10 & 11) the site is not visible.

2.61. From the AONB itself the proposal would be partly visible from viewpoint 12 & 13 on the North Downs Way PROW like the Woodcut Farm development however, at 2.6km distance the proposal would not be prominent or overly intrusive as similar concluded for Woodcut Farm. The CO draws conclusions with regards to landscape noting the proposal would have a significant visual impact from the A20 beyond and to the west of the site as well as also from the A20 flyover and Old Mill Road within 400m and that such impact would not be sufficiently mitigated by the limited landscaping. I comment on this, further in my proof. The CO also



notes significant harm to the character and countryside within the local area though its scale, further consolidation of development, urbanisation, and prominence in local views. Separately it would have a significant adverse impact on the setting of the AONB in views towards the scarp slopes from Old Mill Lane. (I also refer to this as Road)

2.62. I address the points raised in the Officer's Report in further sections of my proof, but in broad terms there is significant overlap between my view and that of the case officer, albeit with some areas of difference which are set out in my proof.

3. Description of the Proposals

Application Scheme

3.1. The application seeks outline permission for a storage and distribution building (Class B8 use) with a floorspace up to 10,788 sqm, ancillary offices, car and HGV parking, landscaping and infrastructure with all matters reserved except for access. The access would be in the western corner of the site with works proposed on the A20 to create a right turn lane from the east. Whilst in outline an Illustrative Masterplan has been provided which shows a single building on the east part of the site with loading bays and parking areas in front on the western part. The Planning Statement states that the development will comprise the follow:

- Warehouse building to have a maximum external height of 15m.
- A maximum of 100 employee visitor car parking spaces.
- 58 cycle spaces and 10 motorcycle spaces.
- HGV parking for 40 vehicles comprising 24 parking spaces and 16 docking bays.

Modification to Appeal Proposals

3.2. The application included an Illustrative Landscape Masterplan (Revision E). This shows further structural woodland planting framing the proposed building with regard to its eastern and southern elevations. The landscape scheme (Revision E) has been carefully designed so that the entrance area has an 'open aspect' to ensure that the proposed building is visible from the A20 adjacent road. This design would show an attractive landscape as frontage with the building set back into the site away from the A20 road. I acknowledge that landscape design is illustrative at this stage, and would be subject of a condition requiring further approval. If visibility of the building from the adjacent Ashford Road is a particular concern, the outline landscape layout allows for flexibility to and in particular, to enable the frontage to be planted with additional structural woodland planting to reflect the other boundary treatments of the site (see example, Revision F). Such a landscape design could be enforced by means of a suitably worded condition, and I have addressed how such a condition could be discharged by robust structural landscaping proposals which would help to mitigate visual effects of the proposals, with regard to the adjacent A20 and Old Mill Road.

3.3. Additionally, land on the south side of Ashford Road is within the control of the Appellant. This land is now quite open in aspect as the historic hedgerows in this area have disappeared

over time leaving only a few remnant isolated shrubs. The most northerly triangle field adjacent to the Ashford Road could be subject to further tree planting along its western boundary as well as its southern boundary. These trees would grow in a free-form manner with a mature height of approximately 15m plus. This proposed general design is illustrated on a planting plan at appendix 10.

- 3.4. The application building is proposed to be up to 15m in height. The adjacent Woodcut Farm development which is near completion has an overall height of 68.2m AOD. Mindful of this height as a benchmark, it is proposed that the roofscape to ridge height for the proposed building would be a maximum of 67.5m AOD, which could be addressed by condition. This means that the overall height of the building and floor level can be flexible ensuring that the overall height does not exceed 67.5m. The photomontages at appendix 11 are based on floor levels and building heights so that the overall height of 67.5m AOD is achieved. In contrast, the LVIA photomontage is based on 54m floor level and building height of 15m resulting in a total of 69m AOD. The photomontages in my proof assume a maximum height of 67.5m AOD.

General Design Principles

- 3.5. The site currently comprises one arable field. The site is enclosed with both traditional field boundary treatment of trees and hedgerows and framed by an employment site to the north and to the north-east lies the M20, junction 8 together with Maidstone MSA Services.
- 3.6. A full description of the proposed development is set out in the Design and Access Statement and Planning Statement submitted with the application and in the Officer's Delegated Report. A summary of the development proposals is set out below in landscape terms.
- 3.7. The application proposal seeks outline planning permission with landscaping reserved, therefore the conceptual masterplan is intended to only be illustrative which I acknowledge in my analysis. This also applies to the Landscape Masterplan, which is also illustrative at this stage, see drawing number P21-3546-06 Rev E.
- 3.8. It is proposed that vehicular access to the site is taken off the A20 Ashford Road. The internal road and pedestrian networks will extend from this point.
- 3.9. The landscape areas would be primarily naturalistic in design around the perimeter of the site with some limited ornamental planting associated with the car parking bays.

- 3.10. The landscape scheme would provide green infrastructure for the benefit of the wider landscape recreational access for the benefit of the wider community. The scheme reflects the local landscape character providing new hedgerows and tree cover, tree belt planting.
- 3.11. With regard to the design and layout of the development, the single building has been carefully located so that it is located close to the site's eastern boundary so that it set well back from the A20 Ashford Road.
- 3.12. The landscape design principles can be summarised as follows:
1. A landscape tree belt would be provided along the southern boundary;
 2. New naturalistic landscape areas;
 3. New tree planting and hedgerows are proposed;
 4. Amenity planting associated with the parking bays;
 5. Landscape corridor fronting the A20 Ashford Road.
- 3.13. The landscape would primarily comprise native trees and shrubs which would reinforce the site's strong landscape framework.
- 3.14. I comment on the design of the scheme from a landscape perspective. The Ministry of Housing Communities and Local Government published a National Design Guide (NDG) (September 2019) to provide guidance to secure beautiful, enduring and successful places and sets out ten key characteristics with these objectives in mind.
- 3.15. Internal page 6 of the document usefully defines the specific terms: 'layout'; scale; appearance and landscape as follows. Paragraph 23 defines layout as:

"Layout shows how routes and blocks of development are arranged and relate to one another to create streets, open spaces and buildings. It defines:

The structure or settlement pattern

The grain, or the pattern of development, blocks and plots

The broad distribution of different uses, and their densities or building heights."

- 3.16. 'Scale' is defined in paragraph 26 as follows:

"Scale is the height, width and length of each building proposed, within a development in relation to its surroundings. This relates both to the overall size and massing of individual buildings and spaces in relation to their surroundings, and to the scale of their parts. It affects how a space can be

used and how it is experienced. The relationships between the different dimensions of a building or component are known as its proportions.”

3.17. ‘Appearance’ is defined in paragraph 27 as follows:

“Appearance is the aspects of a building or space within the development which determine the visual impression the building or space makes, including the external built form of the development, it’s architecture, materials, decoration, lighting, colour and texture. In the case of a space, its landscape also influences its appearance.”

3.18. The term ‘landscape’ is also defined in paragraph 28 of the document as follows:

“Landscape is the treatment of land for the purpose of enhancing or protecting the amenities of the site, the area in which it is situated and the natural environment. Landscaping includes landform and drainage, hard landscape such as surfacing, boundary treatments, street furniture and play equipment. It also includes soft landscape – trees, shrubs and other planting.”

3.19. In the NDG (2019) the first of the ten characteristics referenced is ‘context’ which is concerned with the location of the development and the attributes of its immediate, local and regional surroundings. It goes on to note that well-designed places are based on a number of factors:

1. A sound understanding of the features of the site and the surrounding context;
2. Integration into the surroundings so they relate well to them;
3. Influenced by and influence their context positively; and
4. Responsive to local history, culture and heritage.

3.20. Section C1 of the document is concerned with understanding how a site relates well to its local and wider context. This scheme has taken these factors into account with regard to the site’s context.

3.21. For the reasons I set out below, I consider that the proposals accord with these principles of good design and would lead to positive landscape and visual effects.

3.22. The detailed descriptions of the proposal, as set out in various documents including the Design and Access Statement note that the design of the proposals would anchor the scheme in its locality, assisting in establishing its sense of place mindful of its development context and the adjacent Woodcut Farm development.

Green Infrastructure Broad Design Principles

- 3.23. The vision for land adjacent to Ashford Road was to design and create a green infrastructure that would provide a naturalistic wooded landscape framework to effectively assimilate the proposal in its local landscape context.
- 3.24. At a macro level, the proposed green infrastructure would ensure that the development is set within the structure of an attractive landscape which would mitigate visual impacts. The development would deliver a cohesive and high-quality green infrastructure network that would:
1. Support local landscape character to provide an attractive sense of place and enhance visual amenity;
 2. Protect and enhance existing green infrastructure assets namely the trees and hedgerows within and around the perimeter of the site.
 3. Protect and create habitats to enable biodiversity habitats and species to thrive;
 4. Provide a resilient and adaptive environment in the face of climate change, principally through tree planting.
- 3.25. The illustrative landscape plan (Revision E) demonstrates how the development could be laid out to respond to the opportunities that the site offers.
- 3.26. The green infrastructure if delivered in the manner I propose would deliver a large range of benefits considered enhancement which would include:
1. Climate change adaptation and mitigation – principally tree planting for natural air-cooling and CO2 absorption
 2. Protecting and enhancing landscape character and appearance and biodiversity by using land improvements and management to deliver biodiversity gain and overall landscape enhancement
 3. Introduce native tree belt around the perimeter of the site (as advocated by the AONB setting Position Statement)
- 3.27. For the landscape proposals for the development, I have divided these into a number of different character areas and I comment on each of these specific areas as set out in the proceeding paragraphs.

Northern Boundary

- 3.28. The northern boundary is currently defined by a double hedgerow which demarcates a former green lane which is now defunct and severed as a consequence as a result of more recent highway infrastructure namely the junction 8 M20. Along this former alignment are

several young standard trees. This existing perimeter vegetation would be retained which defines separation between Woodcut Farm to the north and the appeal site to the south. The eastern end of the northern boundary would form a narrow triangular area of landscape which would be reinforced with additional standard trees which are heavy standards and extra heavy standards in size giving an initial approximate height of 4m. These trees would be further reinforced with structural planting which would comprise native trees and shrubs with these extending typically 3m in height as selected standards. This northern landscape corridor would be completed planted with shrub planting using native shrubs which would develop to for understory. All of this structural planting would frame the northern elevation of the building leaving a hard surface service strip adjacent to the elevation for maintenance access.

- 3.29. The western part of the north boundary would also accommodate some native shrub planting to frame several small buildings including the cycle store and security gatehouse and would also include some proposed standard trees.
- 3.30. The combination of the retained hedges and trees together with the proposed landscape would in combination provide a robust and substantial landscape corridor along the northern boundary of the site and would assist in visually framing the proposed building.

South West Boundary

- 3.31. The southwestern boundary forms a gentle curve defined by the Ashford Road and its slip road. The eastern side of this boundary is defined by a mature hedge together with some tree cover which frames part of the Ashford Road. This vegetation would be retained. This would be reinforced with further tree and shrub planting. This would form a landscape corridor which would be reinforced with additional standard trees which are heavy standards and extra heavy standards in size giving an initial approximate height of 4m. These trees would be further reinforced with structural planting which would comprise native trees and shrubs with these extending typically 3m in height as selected standards. This northern landscape corridor would be completed planted with shrub planting using native shrubs which would develop to for understory. All of this structural planting would frame the northern elevation of the building leaving a hard surface service strip adjacent to the elevation for maintenance access.

3.32. The landscape adjacent to the Ashford Road accommodates the access road into the site which would also be framed with landscape. The Illustrative Landscape Masterplan shows much of this area designed as amenity lawns with full planting punctuated with native shrub planting and standard trees. The design rationale allowed for visibility of the building from the entrance. However, this is an illustrative design. As illustrated at appendix 9, an alternative landscape design could include all of this area planted with standard trees and shrubs to form a dense understorey and upper canopy of native vegetation such that with the curved alignment of the access road would substantially screen the proposed building from the A20. Either approach would be satisfactory in my view.

Eastern Boundary

3.33. Beyond the red line on the eastern boundary is the highway corridor which forms an engineered embankment to the M20 motorway. The area is predominately defined by native trees and shrubs which are maturing into a tree belt all of which would be retained and physically unaffected by the proposals. All of this existing vegetation would be augmented with additional tree and shrub planting to form a landscape corridor. This landscape would be reinforced with additional standard trees which are heavy standards and extra heavy standards in size giving an initial approximate height of 4m. These trees would be further reinforced with structural planting which would comprise native trees and shrubs with these extending typically 3m in height as selected standards. This northern landscape corridor would be completed planted with shrub planting using native shrubs which would develop to form understorey. All of this structural planting would frame the northern elevation of the building leaving a hard surface service strip adjacent to the elevation for maintenance access.

Car Park and Service Area

3.34. The car park and service area would be framed and punctuated with standard trees and shrubs to create an attractive green frame to this area. A native hedge would frame much of the car park to provide strong special definition.

Off-Site Tree Planting

3.35. The field to the south-west of the site on the opposite side of Ashford Road is a former defunct triangular field with a few remnant shrubs along its southern boundary. These would be retained. The western and southern boundaries to this field would be subject to new native tree planting. This would reinforce physical boundaries on two sides of the field (see



Planting Plan). It is intended through management and maintenance that these trees would be allowed to grow in height to 15m plus (see appendix 10).

Summary

- 3.36. The scheme has been carefully designed to reflect the local development context, particularly with regard to Woodcut Farm.
- 3.37. I consider that the proposed development would be in keeping with the local commercial development. Furthermore, the design of the scheme together with its green infrastructure, I consider accords with current best practice advocated in the NDG (2019) from a landscape and visual perspective. My analysis and review here has assisted me in forming my professional judgement concerning character and appearance matters I examine in subsequent sections of my proof.
- 3.38. The design of the scheme takes the site's opportunities available to deliver a landscape masterplan and design that is pragmatic whilst innovative and as such reflects best practice and accords with the local landscape and relevant design policies. In essence, it would reflect the local sense of place. The proposed landscape scheme as an application drawing revision E is, I consider, to be acceptable in effectively assimilating the proposed development in its local development context. Landscape scheme revision F shows the site allows flexibility for additional tree planting which would provide a greater degree of physical and visual containment, should that be considered necessary.

4. Effect on Landscape Elements and the Character of the Site

Introduction

- 4.1. This section of my evidence explains why the scheme would in overall terms result in some beneficial effects as far as landscape elements are concerned, mindful of the fact that these elements collectively define much of the character of the site's context.
- 4.2. This section assesses the effects of the scheme upon those landscape elements and features that currently characterise the site and its immediate boundaries. My analysis is based on the Landscape Masterplan, Revision E submitted with the application.

Hedgerows

- 4.3. The scheme would involve no loss of hedgerows as there are no internal hedgerows across the site and those hedgerows that are on the perimeter can be accommodated. The landscape masterplan shows the scheme would deliver a 'net gain' of hedgerows within the landscape areas, landscape areas and corridors.
- 4.4. To accommodate the proposed site access and associated visibility splays, there would be no loss of hedgerows.
- 4.5. Additional hedgerow planting would be located around the perimeter of the car parking area as illustrated in the Detailed Landscape Masterplan prepared by Pegasus, resulting in an overall net gain in the hedgerow resource and beneficial effects with regard to the hedgerow resource on the site, with a medium level of susceptibility, value and sensitivity combined with a medium magnitude of change which would result in a moderate beneficial effect.

Trees and Tree Cover

- 4.6. No trees are proposed to be removed to accommodate the proposed development.
- 4.7. Forming an integral part of the design, it is proposed to introduce a substantial amount of tree cover around the perimeter of the site to augment what is already present beyond the red line.
- 4.8. This tree planting would create a strong physical and visual framework in the short, medium and longer term. It is proposed that the trees planted around the perimeter of the

development area would provide visual interest and frame the building and parking area. The principle is to introduce native tree species, some with an ornamental character such that the overall resultant tree cover would enhance the general visual amenity of the locality.

- 4.9. This gain needs to be set against no loss of trees. Given the tree resource has a high susceptibility, value and sensitivity combined with a medium magnitude of change, there would be a major beneficial effect in terms of tree resource associated with the proposal.

Land Cover/Existing Land Use

- 4.10. The site is comprised of one arable field. Whilst the proposed development would result in the loss of a field to accommodate the proposed development, the proposed scheme would create areas of naturalistic woodland and landscape. The scheme would inevitably result in the loss of some arable land within the site. Given a low susceptibility value and sensitivity, combined with a high magnitude of change, the proposal would result in a moderate (adverse) degree of effect to the site itself. However, this does need to be balanced against the fact that the proposal would introduce woodland/hedge planting where there is none currently.

Topography

- 4.11. The site and the surrounding area is essentially gently undulating in terms of topographic profile and sits at approximately 55m AOD. The proposed scheme would therefore share broad topographic continuity with the adjacent Woodcut Farm development. As a result, there would be no requirement for any substantial earthworks.
- 4.12. As such, the legibility of the topographic profile of the site and surrounding area would prevail with the scheme in place. Based on a low susceptibility, value, sensitivity, combined with a low magnitude of change, this would result in a minor (adverse) effect upon the topography of the site.

Public Rights of Way

- 4.13. The site has no public rights of way located within it and therefore the scheme would not physically affect any existing route nor require any diversions or stopping up. The site has no value in terms of informal recreation in this regard.
- 4.14. With a high susceptibility, value and sensitivity, combined with no magnitude of change, there would be no degree of effect with regard to recreational opportunities.

Water Features

- 4.15. There are no water features associated with the site nor are any proposed with the scheme, as a result there would be no adverse effect on water features as a result of this proposal.

Summary

- 4.16. In overall terms, the scheme would result in some beneficial effects with regard to the landscape elements that currently define the landscape character of the site. The site would change from a single arable field to an employment site comprising a warehouse together with ancillary infrastructure. The elements that currently contribute to defining the character of the site and its locality, namely trees, shrubbery and hedgerows would all be strengthened and form more prominent elements in the medium and longer term, but I recognise this would be in the context of a new B8 development.

Landscape Character of the Site

- 4.17. The site is currently managed as arable land forming one field. The boundaries of the site are in the main, framed by a combination of mature hedgerows and tree belts, which provide a strong sense of visual containment and enclosure associated with the site. There are significant urbanising influences associated with the site including nearby built infrastructure and highway network. There is an industrial estate which is contiguous with the site's northern boundary which reveals a strong sense of physical and visual connection between the site itself and adjacent industrial estate. The site itself does not accommodate features such as trees and hedgerows, however, these lie on the perimeter of the site and these elements would be retained, and their presence reinforced with the green infrastructure proposals as an integral part of the scheme.
- 4.18. Collectively, if one draws the different elements of the site together, it defines the overall character of the site itself. In summary, the site is characterised as a field but is significantly influenced visually by the adjacent built infrastructure and industrial buildings. The site is framed to the north by a commercial trading estate, Woodcut Farm. To the east lies the M20 and Maidstone service area whilst to the south lies the A20 Ashford Road and slip roads and associated highways infrastructure such as lighting columns. The site is currently significantly affected by the substantial urbanising influences of other adjacent development. The site in terms of its character appears as an urban fringe edge of settlement environment.

- 4.19. The scheme would introduce a high-quality employment site which would be in keeping with the local character area, not at odds or out of character or appearance. However, adopting a precautionary approach the proposals would result in an overall adverse effect in landscape character terms. The proposal would accommodate significant new green infrastructure which would reinforce local landscape features and be more representative of the local landscape character area and therefore would result in some beneficial effects at the site level.
- 4.20. The boundaries of the site is, on the whole, framed by a combination of built form and mature hedgerows and maturing tree cover, which provide some sense of visual containment and enclosure associated with the site.
- 4.21. The existing Woodcut Farm development is contiguous with the site's northern boundary which creates a strong sense of physical and visual containment between the current settlement edge and the adjacent parts of the site. The locality is currently defined by an arrangement of various built-in infrastructure which collectively define the character of the site's immediate environs. Outside of an existing urban area it would be hard to find a site which was more influenced by adjacent large scale road infrastructure and large scale buildings. The landscape proposals would also provide a much more robust landscape framework for the proposed development, all of which would be in character with the local and wider landscape.
- 4.22. At the site level, with a low susceptibility (given its peri-urban character), value and sensitivity combined with a high magnitude of change would result in an overall moderate (adverse) effect in landscape character terms with regard to the site itself.

5. Effect on Landscape Character Beyond the Site

Introduction

- 5.1. This section of my proof explains how the scheme would have a bearing upon the landscape character of the surrounding area. As defined in the GLVIA glossary landscape character is defined as “A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different to another...”.
- 5.2. To further clarify a distinction in the use of terms, Landscape Character Areas (LCAs) are discrete geographical areas of a particular landscape, as opposed to Landscape Character Types (LCTs), which are defined in GLVIA, page 157 as follows:

“These are distinct types of landscape that are relatively homogeneous in character. They are generic in nature in that they may occur in different areas in different parts of the country, but wherever they occur they share broadly similar combinations of geology, topography, drainage patterns, vegetation and historical lands use and settlement pattern, and perceptual and aesthetic attributes.”

- 5.3. A number of landscape character assessments have been undertaken in recent years to identify both **Landscape Character Types (LCTs) and Areas (LCAs)** as defined above and have been published to assist professionals in understanding how decisions can affect landscape character.
- 5.4. I have provided some narrative here in this section to explain how the proposed scheme would have a bearing upon the wider landscape character of the area beyond the site itself.

National Character Area (NCA 120) The Wealden Greensand

- 5.5. The site and the surrounding area are located within the **National Character Area 120 Wealden Greensand**. This NCA forms part of an assessment of the character of England's landscape, first undertaken by the Countryside Agency but now the responsibility of Natural England.
- 5.6. Internal page 6 of the document provides a summary of the NCA and identifies the key defining characteristics of this landscape as follows:

- *“A long, narrow belt of Greensand, typified by scarp-and-dip slope topography, including outcrops of Upper Greensand, Gault Clay and Lower Greensand. The Greensand forms escarpments separated by a*

clay vale: the overall undulating and organic landform – particularly in the west – gives a sense of intimacy to the landscape. Leith Hill in Surrey is the highest point in south-east England.

- *There are extensive areas of ancient mixed woodland of hazel, oak and birch, with some areas having been converted to sweet chestnut coppice in past centuries. These areas reflect the diverse geology, including the distinctive chalk grassland elements within the East Hampshire Hangers Special Area of Conservation (SAC), the wooded commons ('charts') of East Surrey and West Kent, and conifer plantations.*
- *Semi-natural habitats include: remnant lowland heathland, mostly concentrated in West Sussex, Hampshire and West Surrey; the wetlands associated with the River Arun in West Sussex; and unimproved acid grasslands found in commons, parklands, heathland and other areas of unimproved pasture.*
- *Fields are predominantly small or medium, in irregular patterns derived from medieval enclosure. Boundaries are formed by hedgerows and shaws, with character and species reflecting the underlying soils. On the clay, hedgerows are dense and species-rich, with occasional standard oaks. On more acidic soils they generally consist of hawthorn and blackthorn, also with occasional oak trees, and often trimmed low.*
- *Agricultural land comprises a mosaic of mixed farming, with pasture and arable land set within a wooded framework. There is a fruit-growing orchard belt in Kent and also around Selborne in Hampshire.*
- *The rural settlement pattern is a mixture of dispersed farmsteads, hamlets and some nucleated villages. Large houses set within extensive parks and gardens are found throughout the area.*
- *In the east of Kent, the Wealden Greensand has a gentler and more open aspect than in the wooded west. This part of the area is also more marked by development, with the presence of major towns and communication corridors such as the M26, M25 and M20 motorways and railway lines including the Channel Tunnel Rail Link (High Speed 1).*
- *The local built vernacular includes the use of Greensand, ragstone and, in the west, malmstone, bargate stone, plus dark carrstone patterned in the mortar between stones ('galleting') in Surrey, as well as timber-framing and weatherboarding.*
- *There are a range of historic landscape features, including field monuments, old military defences, prehistoric tumuli, iron-age hill forts, Roman forts, the Royal Military Canal, small quarries and relics of the iron industry (including hammer ponds). Sunken lanes cut into the sandstone are a historic and characteristic feature, as are older deer parks and more recent 18th-century parklands.*

- ***Surface water is an important feature across the Greensand, with many streams and rivers passing through the NCA: the Western Rother, Wey, Arun, Medway and the Great and East Stour.***
- ***The Greensand ridge meets the coast of Kent between Folkestone Warren and Hythe. While most of the coastal strip is now built up and protected by sea defences, the undeveloped sea cliffs at Copt Point provide important geological exposures, are designated for their nature conservation interest and fall within the Dover–Folkestone Heritage Coast.*** (my emphasis)

5.7. All of these key defining characteristics would continue to remain beyond the immediate environs of the site. Beyond the site, the character of the landscape would not change as the effects of the proposal on this landscape character would be negligible in terms of degree of effect.

5.8. With regard to Statements of Environmental Opportunity, SEO4 notes that:

“Plan to deliver a network of integrated, well managed green spaces in existing and developing urban areas, proving 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.” (my emphasis)

5.9. The scheme would accord with this broad strategy. With regard to this, the proposal would protect and maintain the long distance views of the AONB as well as general panoramic vistas across the NCA. The proposal would also retain and enhance the strong hedgerow and wooded pattern. It would maintain the character and views from the Old Mill Road and the design has ensured that the local landscape character is respected and reflected in the proposed scheme.

5.10. The NCA document provides examples with regard to SEO4 and specifically refers to creating areas of broadleaved woodland around towns to provide a buffer to new development which also helps to provide climate change adaptation as well as enhance landscape character and deliver biodiversity benefits. It also goes on to note ensuring that development and its associated infrastructure does not intrude on the rural landscapes or the special qualities of adjacent protected landscapes such as the Kent Downs AONB conserving remaining areas of tranquillity. It also goes on to reference existing landscape character to inform design and to ensure integration with the surrounding landscape. The final example refers to developing a strategic approach to green infrastructure across the NCA and in so doing, take account of the existing urban areas and areas of growth. Specifically, planning a network of green spaces

across the urban areas, urban fringe and adjacent countryside which can result in multiple benefits for the environment.

- 5.11. The overall key characteristics reveal a settled and farmed landscape with many specific references to infrastructure and individual settlements. This NE document is inevitably a high-level character assessment, which provides a useful overview by which to understand the character of the local landscape and its surroundings. At this higher level, it is considered that the scheme would bring about negligible change to the key characteristics of this NCA beyond the site. At the character area level, this landscape would have a medium susceptibility and a medium value resulting in a medium sensitivity, which combined with a negligible change of magnitude would result in a negligible degree of effect as a consequence of the scheme being in place. The proposal would be in keeping with the general character of the local landscape and would be in accordance with this NE landscape strategy.
- 5.12. As can be seen from appendix 14, the site located within a transport corridor falls within the Wealden Greensand. Approximately 1km to the north of the site, the landscape changes notably in character as the area becomes more elevated associated with the Kent Downs and forms part of National Character Area 119, referred to as the North Downs. I do not comment upon this NCA as it would remain physically unaffected by the proposed development.

Local Level – Maidstone Landscape Character Assessment (MLCA) March 2012 Amended July 2013

- 5.13. Maidstone Borough Council commissioned Jacobs to prepare the Maidstone Landscape Character Assessment which was amended in July 2013. The purpose of this report was to identify all of the landscape types and landscape character areas that occur in the rural part of the Borough. For each Landscape Character Area, the LCA contains:

- ***“A description of the landscape and its features***
- ***An assessment of its condition (i.e, the pattern of the landscape; the presence of detracting features, the state of the habitats and man-made elements within the landscape)***
- ***An assessment of its sensitivity (i.e, the ability of a landscape to accept change without causing irreparable damage to the distinctiveness of the landscape, a measure of the ‘sense of place’***
- ***Landscape management guidelines.”***

- 5.14. The preamble to the document goes on to note that the LCA will be used to help ensure changes to the landscape take place in a way that maintains the Local Landscape Character, retaining and strengthening positive landscape features. Also to inform the preparation of landscape management strategies and landscape schemes. The report also goes on to note summary analysis is provided to give a broad indication of an area's ability to accommodate change without the loss of its overall landscape integrity.
- 5.15. In this assessment the site and surrounding area is identified as being located in the **Leeds Castle Parklands (LCA 49)**.
- 5.16. The document notes that the Leeds Castle Parklands are situated to the east of Maidstone and encompass a section of the Len Valley. The major infrastructure corridor comprising the M20 and HS1 lies to the north. The western boundary is formed by the eastern extent of Maidstone's urban area and the eastern boundary is defined by the edge of Harrietsham.
- 5.17. The key characteristics of the **Leeds Castle Parklands** are identified in this study as:
- ***"Artificial landform as part of golf course at Leeds Castle***
 - ***Historic Leeds Castle and surrounding parkland***
 - ***Pocket of lowland dry acid grassland***
 - ***Mature parkland trees including oak, horse chestnut and pine***
 - ***River Len to the south***
 - ***Severance caused by the M20, HS1 and A20"*** (my emphasis)
- 5.18. All of these key defining characteristics would continue to remain beyond the immediate environs of the site. Effects on character would be negligible beyond the site itself.
- 5.19. The MLCA provides a description of the Leeds Castle Parklands. In paragraph 49.2 it notes that tree cover is scattered across the landscape in the form of small blocks of mixed woodland including mitigation planting along transport corridors. It also notes in paragraph 49.4 that the field pattern is very irregular as it has been severed by major infrastructure routes. Although tree cover provides a sense of enclosure and restricts views, the major infrastructure corridor of the M20, HS1 and the A20 are clearly audible from the surrounding landscape and reduce the sense of remoteness. Where minor routes pass over or under the M20 and HS1, the size and dominance of the infrastructure becomes most apparent.

- 5.20. Paragraph 49.5 states that built development is sparsely scattered along the A20 and adjoining roads. Furthermore, a notable amount of commercial development is situated along the A20 with a large hotel, caravan park, garden centre and car cleaning facilities. I note that this document being published in 2013 does not take account of the Woodcut Farm Industrial Estate and recent office development on the opposite side of the A20.
- 5.21. With regard to views, the MLCA notes that wider panoramic views of the North Downs are available from higher vantage points such as along Old Mill Lane. (I note that there is Old Mill Road immediately to the south of the site and assume that the document is referring to this highway.)
- 5.22. The document provides landscape analysis concerning the condition of the locality. It notes (para 49.8) that:
- “The major infrastructure routes of HS1, the M20 and A20 cause a significant degree of fragmentation to this landscape, and create an incoherent pattern of elements. Despite these routes being reasonably well integrated into the landscape in visual terms, the audibility of traffic degrades the remote and rural character. In addition to infrastructure, there are many other visual detractors including caravan parks, equestrian grazing and associated facilities and numerous commercial developments along the A20...There is limited arable land and although major infrastructure routes sever connectivity, many parts of the landscape are recognised for their ecological diversity...Traditional field boundaries comprising woodland blocks and tree belts are generally in good condition, although infrastructure routes have caused significant severance to the original field pattern...”*** (my emphasis)
- 5.23. I note that this analysis is prior to the introduction of the Woodcut Farm Industrial Estate and the nearby recent office development.
- 5.24. The MLCA report addresses sensitivity and notes that infrastructure routes and recent development slightly weaken local distinctiveness and fragment the continuity. Furthermore, visibility is moderate with much screening provided by intervening vegetation.
- 5.25. In terms of summary of analysis for the **Leeds Castle Parklands** the condition is assessed as moderate reflecting incoherent pattern of elements many detracting features and visual unity is significantly interrupted. With regard to sensitivity, this is assessed as high with intermittent tree cover and moderate visibility being some of the factors. In light of this analysis, the matrix for guidelines is to ‘conserve and restore’ the landscape and provides a summary of actions including:

- Consider the generic guidelines for valleys
- Conserve and restore tree cover which helps to screen views of major infrastructure routes
- Restore hedgerow boundaries where they have been removed

White Heath Farmlands (49-2)

5.26. Within the Leeds Castle Parklands there are smaller Landscape Character Areas that have been identified and assessed. The site and its immediate environs fall within the **White Heath Farmlands (49-2)**. It should be noted that this analysis undertaken in 2013 does not take account of the more recent consented developments including Woodcut Farm estate. The document identifies the key characteristics of this area as follows:

- **“Major infrastructure**
- ***Vegetation Belts along the head of the Len Valley***
- ***Urban influences including car dealership***
- **Modern development”** (my emphasis)

5.27. All of these key defining characteristics would continue to remain and prevail with the proposed scheme in place. I note that this analysis is prior to the introduction of the Woodcut Farm Industrial Estate and the nearby recent office development.

5.28. With regard to location, it notes that White Heath Farmlands is situated to the east of Maidstone. This area lies within part of the foreground of the Kent Downs AONB. Old Mill Road lies to the east and the M20/HS1 corridor borders the area to the north.

5.29. Under landscape description, the document (para 49.20) notes to the north the landscape is heavily influenced by the M20/HS1 corridor and traffic is both visible and audible. The busy A20 Ashford Road also dissects the area in an east-west direction increasing the impact of major infrastructure and fragmenting the landscape. There is little development within the landscape though a few modern properties and a car dealership are situated along the A20 which gives a slightly suburban character.

5.30. With regard to views, paragraph 49.22 notes within the area are relatively open across the farmland with the major infrastructure standing out. Views out of the area are limited though notes wide views of the North Downs to the north.

- 5.31. Landscape analysis addresses condition at paragraph 49.25 noting that fragmentation is caused by the heavy transport infrastructure and that hedgerow boundaries have been removed in part. The overall assessment for condition is classed as poor.
- 5.32. Regarding sensitivity, this is assessed as moderate noting that this is a sensitive location proving a setting to the AONB with the transport corridors and service area providing little in the way of local distinctiveness.
- 5.33. In light of this analysis, the report identifies landscape guidelines summarised as restore and improve. In terms of actions, it notes consider the generic guidelines for valleys, improve the setting of the AONB and avoid further urban edge influences and expansion of the motorway services. I am mindful that this analysis predates the Woodcut Farm development.
- 5.34. I note that the current use of the site would change to a high-quality logistics site. I would ascribe a low value, susceptibility, and sensitivity combined with a high magnitude of change which would result in a moderate (adverse) degree of effect with regard to the site itself. The Council's consultant conducted the same level of harm regarding the site. The site also exhibits hedgerows and trees around its perimeter, which defines the current field. The local field pattern and the 'grain' of the landscape would remain. The proposed scheme when considered in the context of the wider landscape Len Valley, would have a negligible degree of effect based on a low to medium sensitivity and negligible magnitude of change.

Maidstone Landscape Capacity Study: Sensitivity Assessment (January 2015)

- 5.35. Maidstone Borough Council commissioned Jacobs to undertake a report to determine the broad sensitivity of Landscape Character Areas with regard to possible development. The methodology is based on Topic Paper 6. Reviewing the document, it is evident that discreet parcels of land were identified and assessed with regard to the Local Plan and used to inform land allocation proposals. In this respect, land associated with Woodcut Farm is identified as land parcel reference ED-12. In contrast, the appeal site immediately to the south is excluded as this did not form a proposed allocation and was therefore not considered.
- 5.36. The findings with regard to the Woodcut Farm site are set out on internal page 78 of the document. I note a number of points with regard to this particular land parcel. In terms of landscape character sensitivity, the land was ranked moderate with reference to the M20, the A20 and HS1 as nearby detracting features. That the land had high visual sensitivity and moderate landscape value and that was regarded as a potentially sensitive location close to

and providing the setting of the AONB. In summary, the land was considered to be of high overall landscape sensitivity and had a corresponding low capacity to accommodate development. In terms of opportunities, the site was considered unsuitable for development. Notwithstanding these conclusions, mitigation identified retaining and reinforcing tree belts and significant vegetation and to respect views from, and the setting of, the AONB.

5.37. I note that this analysis is prior to the introduction of the Woodcut Farm Industrial Estate and the nearby recent office development.

5.38. Following the review of the Local Plan, the Inspector mindful of this information allocated Woodcut Farm for employment use and was subject to a series of applications which were approved by MBC. Matters concerning character appearance and setting were repeatedly addressed in the Officers' Reports. I consider that the Woodcut Farm development has substantially changed the character of the local landscape. Furthermore, the surrounding built form and highway infrastructure has a strong urbanising influence over the site such that this has resulted in the site having a low sensitivity and susceptibility to change with a corresponding high level capacity to accommodate development.

Author's Assessment of Landscape Character

5.39. As far as landscape character is concerned, I acknowledge that the site would see some considerable change from one arable field. However, the baseline that needs to be taken into account here is that the proposed scheme is framed by an employment and industrial site to the north and roads on three sides. No significant off-site works are proposed and as such the character of the local landscape beyond the site in both physical and experiential terms would remain materially unchanged with the scheme in place.

5.40. I recognise that the scheme would bring about an inevitable change to the character of the site itself, however, such a change would in physical terms be confined within the site boundaries. Off-site, the pattern of the landcover, trees and hedgerows and agricultural mix, undulating topography, and variety of built infrastructure as identified in the various published reports, would all continue and prevail with the proposed scheme in place. Consequently, it is considered that those key characteristics of the wider landscape beyond the application site boundary as identified above would be physically unaffected with the scheme in place. It is only the experiential factors of character, both visual and audible elements that would be influenced to some limited degree locally. Any noise associated with

the use of this scheme would be negligible in the wider landscape and built infrastructure context particularly given the nearby busy main roads. The scheme would not change the broad character of the wider area as the 'settled agricultural scene', which would continue to prevail with the scheme in place. The sensitive design of the proposed scheme would reflect the local landscape character of development nearby, namely Woodcut Farm. Any such effects would be highly localised, therefore.

- 5.41. The triangular field to the south of the A20 lies outside the red line area and is off-site. There is the option for two of the former field boundaries to be planted with trees as standards with a height of approximately 4m. With their establishment these trees would grow and mature over the medium and long term to an overall height of 15-20m which would reinforce the sense of greenery associated with this adjacent land. The character of this land as farmland would be reinforced resulting in a net beneficial effect.
- 5.42. In summary, whilst the proposal would have an overall moderate adverse effect upon the character of the site itself and immediate environs, the character of the landscape beyond the site would be affected to a negligible degree as a result of the proposed development. The proposed development would have a negligible effect upon the landscape character of the area beyond the site and its immediate environs.

6. Effect on the Setting of the Kent Downs AONB

Introduction

- 6.1. This section of my proof addresses the alleged harm that the proposal would cause to the setting of the Kent Downs AONB as set out in the Reason for Refusal. Furthermore, I respond to the statement prepared by Kent Downs AONB with regard to the appeal.

Maidstone Borough Council's Position

- 6.2. The reason for refusal refers to the AONB but makes no reference to the special qualities of the AONB. Reference is made to alleged adverse impacts on the setting of the designation. I understand that setting relates to its context, which is usually associated with intervisibility, i.e. both views out of the AONB to the landscape beyond the designation and separately views from landscape beyond the AONB looking towards the designated landscape. I proceed to address both these aspects as appropriate with also regard to the special qualities of the AONB, noting that this particular aspect is not cited in the reason for refusal.
- 6.3. Importantly merely changing the setting does not mean that harm to the special qualities of the AONB arises.

Kent Downs AONB Position

- 6.4. The Kent Downs AONB as a Rule 6 Party has submitted a supplementary statement with regard to the alleged harm to the setting of the AONB. This statement notes the special characteristics and qualities of the Kent Downs AONB. In summary, the AONB Unit consider that the site is visible in views from the Kent Downs escarpment and that such views would be materially harmed by the proposal. This is set out under the heading in the statement 'Impacts on the Kent Downs AONB'. In conclusion, the AONB Unit note that the proposed development would result in significant harm to the landscape and setting of the AONB with a deterioration of views out from the designation as well as adversely impacting on views towards the escarpment noting that the proposal fails to be sensitively located. I address each of these aspects in this section of my proof.

The Kent Downs AONB Management Plan (2021 – 2026)

- 6.5. The AONB is subject to a Management Plan. Section 1.2 of the document identifies the special components, characteristics and qualities of the AONB that underpin its significance and natural beauty. It proceeds to identify landscape components which are as follows:

- Dramatic landform and views: a distinctive landscape character
- Biodiversity rich habitats
- Farmed landscape
- Woodland and trees
- A rich legacy of historic and cultural heritage
- Historic coasts
- Geology and natural resources
- Tranquillity and remoteness

6.6. The proposed scheme would be located some distance beyond the AONB environment separated by the Maidstone Services, HS2, M20 motorway and junction 8 and Woodcut Farm development. The proposal would not physically affect any landscape elements or the character of the AONB given it were in place. Therefore, the majority of the landscape components identified above would be physically unaffected as they relate to the physical fabric of the AONB itself. With the exception of two aspects.

6.7. With regard to tranquillity, whilst the AONB is on the whole a relatively tranquil environment, immediately beyond the designation, the landscape exhibits a low level of tranquillity due to the activity and noise associated with the Maidstone Services, HS2, the M20 together with the A20. This is reflected in the Tranquillity Mapping, see appendix 4. The level of activity generating movement and noise with the operation of the proposal, would have a negligible effect upon the AONB to the north from a landscape planning perspective and as such, the sense of tranquillity and remoteness would not be materially affected with the scheme in place.

6.8. With regard to views, a key feature of the AONB is the south-facing steep slopes (scarps) of chalk and greensand and form an expansive plateaux and as such, the Management Plan refers to breathtaking long-distance panoramas from the scarp along with cliffs and plateau.

6.9. Internal page 29 of the Management Plan addresses the concept of setting, noting that setting is the land outside the designated area which is visible from the AONB and from which the AONB can be seen. It goes on to note that 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. It goes in to note that:

“The weight to be afforded to setting issues will depend on the significance of the impact. Matters such as the size of the proposals, their distance, their incompatibility with their surroundings, movement, reflectivity and colour are

likely to affect impact. 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 and decisions.”

6.10. I note that the AONB Unit have produced a Position Statement on setting which was updated in February 2022.

6.11. Internal page 37 refers to the chalk scarp and vales and refers to spectacular views are offered along the chalk escarpment across the Vale of Holmesdale.

The Setting Position Statement (February 2022)

6.12. The AONB Unit issued a Setting Position Statement in February 2022. I note this document is not paginated or paragraph numbered. With regard to the setting of the AONB, it refers to the scarp being a prominent feature in the wider landscape and goes on to identify particular landscapes with regard to visibility and refers to the Vale of Holmesdale. It goes on to discuss development likely to affect the setting of the AONB noting that a number of factors are relevant which are namely:

- Scale
- Height
- Siting
- Use
- Materials
- Design
- Surroundings
- Movement
- Reflectivity
- Colour

6.13. The document goes on to address conserving and enhancing the setting of the AONB noting the best way is to minimise adverse impacts on the setting to make sure that schemes conserve and enhance the setting of the AONB and notes many issues can be resolved through careful design and incorporation of appropriate mitigation and/or management measures. A number of points I summarise below:

- Care over orientation, site layout, height, scale and massing of structures and buildings to minimise impact when viewed from the AONB
- Significant tree planting

- Consideration of not just the site but also the landscape and land uses around and beyond it
- Careful use of colours, materials and non-reflective surfaces
- Restraint and care with installation of external lighting
- Grouping of new structures and buildings close to existing structures and buildings to avoid new expanses of development
- Detailed mitigation including native landscaping

6.14. I note that further advice on design principles can be found in the AONB Landscape Design Handbook.

Design Mitigation

6.15. The proposed scheme has been carefully designed which has included embedded mitigation to the proposals to ensure that it would be effectively assimilated into its local landscape and development context. In terms of scale, the building has been designed to make efficient use of the site, mindful of the demand for warehouse distribution space.

6.16. The height of the building has been carefully considered to ensure that it would be no higher than the adjacent Woodcut Farm development, mindful that the limited level of harm associated with that scheme was considered to be an acceptable level of harm. The height of the building would therefore be determined by the floor level mindful that the overall height of the proposal would not exceed 67.5m AOD.

6.17. In terms of siting, the building is located close to the eastern boundary within the site where there is the greatest degree of existing tree cover along the eastern and southern boundaries associated with the adjacent highways and would be slightly cut into the ground to further reduce its perceived height. Furthermore, in terms of siting, the proposal is framed by significant infrastructure with Woodcut Farm development immediately to the north and the M20 and Maidstone Services to the east and further highway infrastructure immediately to the south. Therefore, this existing infrastructure leaves an isolated single field somewhat severed from the wider farming field pattern. In terms of use, the site is currently managed as one arable field, however, there are no internal landscape features such that the scheme can be accommodated without any loss of landscape features or materially affect ecology.

6.18. The building has been designed to be clad with materials that are dark and non-reflective to ensure that the building appears recessive in both local and distant views where seen. Over recent years the design of large scale employment buildings has evolved considerably, and

the careful use of colours and materials can significantly mitigate impacts irrespective of landscaping. All of these parameters and opportunities have been introduced to inform the design. The building is located on the eastern side of the site to ensure that it is considerably set back from the A20 Ashford Road with the opportunity to introduce landscaping and indeed, tree belts along the frontage to create visual containment.

- 6.19. The site is framed by a wide range of built infrastructure that physically and visually frame the proposal to a significant degree and also provides relevant context for the proposal introducing a distribution warehouse adjacent to Woodcut Farm development such that with maturation of the landscape, both proposals would read as one development. The movement associated with the site would primarily be associated with HGVs and vehicles effectively screened within the car park by perimeter tree belts.
- 6.20. The proposed building and parking areas would be framed by a combination of native tree belts and ornamental planting which upon maturity would substantially screen the building, and which would compliment the existing mature landscaping around the site. In the early years and short term, climbing vegetation would be introduced on the eastern and southern elevations to visually soften and break up the appearance of the elevations. Such mitigation planting is advocated in the AONB Position Statement.

Views from the AONB Escarpment (Scarp Slope)

- 6.21. There are a number of footpaths north of the rail line and motorway service area in the vicinity of Snarkhurst Wood which forms local high ground which is heavily wooded. There is a substantial amount of tree cover in the form of woodlands and tree belts which would substantially limit the opportunity to observe the proposed building and the land to the south within which it sits, from these routes.
- 6.22. Further north, at approximately over 2km from the site are a number of public rights of way which extend over the escarpment slope, together with a long-distance North Downs Way which runs along the crest of the escarpment slope. These routes provide elevated and panoramic views over the lower landscape to the south and reveal countryside heavily punctuated with a variety of built infrastructure. From a number of these routes the proposed building would be partially seen in the context of the Woodcut Farm buildings and would form a very small (barely visible) element within the views resulting in a negligible degree of effect.

Where it is partially seen, it would be seen in the context of the existing development and the change would be barely perceptible.

- 6.23. The Kent Downs AONB Unit raised concerns concerning views from the AONB. The AONB Unit have prepared a Statement of Case which specifically addresses the impacts upon the AONB noting the site is visible from the scarp of the North Downs. However, the Statement does not specify where in particular the development would have a significant impact. In light of this ambiguity, the AONB Unit were contacted to clarify this matter, whereupon the Unit responded with specific reference to the footpath in the vicinity of viewpoint 12. This viewpoint is addressed with a photomontage at appendix 11. The AONB Unit did not identify any other viewpoint location in their response to request for clarification.
- 6.24. The visual impact schedule is included at appendix 6 with analysis regarding viewpoint 12 which concludes for both year 1 and year 15, the degree of effect would be negligible as a result of the proposal. This analysis has had regard to a number of factors. The viewpoint is located on the upper escarpment which provides a southward panoramic view over the vale landscape which reveals an environment which is rural, i.e. countryside but is punctuated throughout with a variety of built infrastructure including residential and commercial areas. In the far distance the existing Woodcut Farm development can be observed. The proposed scheme would be situated alongside this existing development. In terms of its scale, it would account for approximately one degree in the horizontal arc of the view and similarly, approximately one degree vertical arc of view. The cladding materials are designed such that the building elements where visible would be recessive in nature. Existing vegetation, together with proposed planting would substantially screen the proposed building. Whilst there would be some change to the view at viewpoint 12, the overall character of the view would not change with the proposed scheme in place. The effect upon the view would be negligible in terms of degree of effect given the wide panoramic context (see photomontage, appendix 11).
- 6.25. There are a number of public rights of way extending along the escarpment to the north-east of the site. However, a short distance to the north of the site lies Snarkhurst Wood which extends over some local high ground and as a result, from much of the escarpment to the north-east, the proposed scheme would lie on the 'lee side' of this local topographic feature and would be effectively screened from views from much of the AONB escarpment which probably explains why the AONB have identified the one viewpoint 12 in their response. In

light of this overall analysis, I consider that the proposal would have a negligible effect upon the visual amenity as experienced from the AONB and in particular, its escarpment.

- 6.26. The landscape character of the AONB itself would remain physically unchanged with the scheme in place even taking into account experiential and perceptual elements. Furthermore, the identified special qualities in the Management Plan associated with the AONB would be conserved with the proposed scheme in place.

Views Towards the AONB from Old Mill Road

- 6.27. Old Mill Road (Lane) is an unclassified lane, with no segregated footways which extends slightly over 1km in length and connects with the A20 close to the site at its northern point, with the southern end forming a T- junction with Forge Lane close to the village of Leeds. Users of this lane, travelling south would be visually unaffected.
- 6.28. Users travelling north along this road would start at the T junction at Brogden. At this point the lane is framed by high hedgerows such that the view northward forms a narrow view with no view of the proposal. A short distance further north, the route affords a brief view such that some of the Woodcut buildings are visible but the proposed development would be screened by topography and vegetation.
- 6.29. Travelling further north along this road, the road climbs slightly to a crest and is framed by high hedgerows such that views northward are highly restricted with neither the Woodcut nor the appeal scheme visible. Beyond this point the road adopts a dog-leg arrangement where a glimpsed view of the Woodcut scheme can be observed, however the proposed building would be screened by tree cover and topography even as the road returns in a northward direction downslope. The local high ground of Snarkhurst Wood forms a topographic backdrop to the Woodcut buildings with the far horizon defined by the AONB escarpment slope. For users travelling further north views become further restricted by roadside vegetation and topography and tree cover as the road descends downslope into a local valley.
- 6.30. In the valley bottom, at Old Mill Farm, the road meanders with several tight turns with views restricted to the road ahead as views are framed by roadside vegetation, topography and built form. North of this point the road climbs out of the valley, through a complex of farm buildings, which further restrict northward views. Indeed, local ground in the middle distance forms the horizon for views along this ascending stretch of road. At the ridge of this local high

ground the road turns in a north-eastern direction at approximately 400m from the site. From this location, the Woodcut Farm buildings are visible with construction underway with the eastern land parcel adjacent to the site. From this location northwards along the road there is a lack of hedgerows associated with the fields in the intervening distance, and therefore there would be a view of the proposed building at year 1.

- 6.31. A woodland framework is proposed on the southern boundary of the site with standard trees along two historic field boundaries. This vegetation, once established would grow to create standard trees, which should mature at 15m plus in height. The layering effect of this vegetation in combination would substantially screen the proposed development, the lighting columns associated with the A20 and the Woodcut buildings. This limited degree of visibility continues along the length of this road as far as its junction with the A20.
- 6.32. The proposals would be in any event seen in the context of the existing buildings to the left of the view, and would not be higher or more prominent. The change in the effect upon views of the AONB itself would be at the bottom end of the scale of effect.
- 6.33. Views towards the AONB in the locality of the site are generally restricted to short or glimpsed and fleeting views in the main with regard to public rights of way and local highways. A short section of the northern part of Old Mill Road affords some views towards the AONB escarpment. Such views are contextual, see viewpoint 6 photomontage, appendix 11. The foreground is defined by several fields and the middle distance is defined by Woodcut Farm development, whilst in the vicinity of the site there is a concentration of high level lighting columns beyond which lies a line of mature tree canopies and it is only beyond these tree canopies that the AONB escarpment is observed in the far distance revealing grassland and woodland on the highest rising ground. The proposed building would be located in the middle ground situated in front of some of the lighting columns and tree cover. It would allow views beyond to the upper slopes of the escarpment such that the legibility of the escarpment forming the far horizon would remain with the proposed scheme in place.
- 6.34. The landscape scheme, revision E would introduce some tree cover in the site frontage which would partially screen and soften the appearance of the building. With the benefit of the off-site tree planting and further woodland planting associated with the site frontage (see Revision F, appendix 9), this tree cover would increasingly screen both the proposed building and adjacent Woodcut Farm development reducing the visual profile of all these buildings in



the middle distance in the medium and longer term. The proposal would conserve the setting of the AONB with regard to views from the Old Mill Road.

7. Effect on Visual Amenity (Appearance)

Introduction

- 7.1. To reiterate, character and appearance are two different aspects. The physical character of the surrounding landscape would remain unaltered with the scheme in place.
- 7.2. In order to gain a better understanding of the extent and nature of the change brought about by the appeal scheme on the appearance of the local landscape, I examine the effect of the proposed scheme on the general visual amenity of the landscape and the perception of those visual receptors (people) using the landscape.
- 7.3. My assessment is based on the representative LVA viewpoints and my site visit to public routes in the locality.
- 7.4. Visual amenity is defined on page 158 in the Glossary of Guidelines for Landscape and Visual Impact Assessment – Third Edition (April 2013) as:
- “The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area.”**
- 7.5. The application was accompanied by an LVA, which I have reviewed. In preparing my proof, I have undertaken my own assessment and documented this in a summary form as a visual impact schedule at appendix 6. I rely upon these findings to inform my judgements set out in my proof.
- 7.6. Much of the landscape within the locality would be visually unaffected by the proposed scheme. In reality, the actual visual envelope from where the proposed scheme would be seen would be substantially constrained owing to the built form and the layering effect of vegetation including the field boundaries and hedge trees in the intervening landscape between the visual receptor (person) and the appeal site boundaries.
- 7.7. The appreciation of views from the countryside is mainly gained from vantage points accessible to the public. The two main ways in which members of the public can gain an appreciation of views when in the countryside are primarily from public highways and by using the various public rights of way that pass through the landscape. I provide a summary below in terms of my analysis.

Visual Effect on Old Mill Road

- 7.8. Old Mill Road is an unclassified lane which extends slightly over 1km in length and connects with the A20 close to the site at its northern point, with the southern end forming a T-junction with Forge Lane close to the village of Leeds. Users of this lane, travelling south would be visually unaffected. Users travelling north along this road would start at the T junction at Brogden. At this point the lane is framed by high hedgerows such that the view northward forms a narrow view with no view of the proposal. A short distance further north, the route affords a brief view such that some of the Woodcut buildings are visible but the proposed development would be screened by topography and vegetation.
- 7.9. Travelling further north along this road, the road climbs slightly to a crest and is framed by high hedgerows such that views northward are highly restricted with neither the Woodcut nor the appeal scheme visible. Beyond this point the road adopts a dog-leg arrangement where a glimpsed view of the Woodcut scheme can be observed, however the proposed building would be screened by tree cover and topography even as the road returns in a northward direction downslope. The local high ground of Snarkhurst Wood forms a topographic backdrop to the Woodcut buildings with the far horizon defined by the AONB escarpment slope. For users travelling further north views become further restricted by roadside vegetation and topography and tree cover as the road descends downslope into a local valley.
- 7.10. In the valley bottom, at Old Mill Farm, the road meanders with several tight turns with views restricted to the road ahead as views are framed by roadside vegetation, topography and built form. North of this point the road climbs out of the valley, through a complex of farm buildings, which further restrict northward views. Indeed, local ground in the middle distance forms the horizon for views along this ascending stretch of road. At the ridge of this local high ground the road turns in a north-eastern direction at approximately 400m from the site. From this location, the Woodcut Farm buildings are visible with construction underway with the eastern land parcel adjacent to the site. From this location northwards along the road there is a lack of hedgerows associated with the fields in the intervening distance, and therefore there would be a view of the proposed building at year 1.
- 7.11. Tree planting is proposed on the southern boundary of the site with standard trees along two historic field boundaries. This vegetation, once established would grow to create free-form standard trees, which should mature at 15m plus in height. The layering effect of this

vegetation in combination would substantially screen the proposed development, the lighting columns associated with the A20 and the Woodcut Farm buildings. This limited degree of visibility would continue along the length of this road as far as its junction with the A20.

Views of the Proposed Scheme from Land to the North

- 7.12. With regard to highways, I would note the following. A short distance to the north of the site lies the northbound slip road off the junction 8 which is orientated northwards to link into the M20 motorway. Additionally, there is the north and southbound carriageways of the M20 as well as a further southbound slip road to the junction. All of this road infrastructure is set down in the local landscape framed by embankments. The traffic travelling northbound would be visually unaffected as lines of sight would be north-west and away from the proposed scheme.
- 7.13. For motorists travelling southbound there would be the opportunity to gain views southward towards the site, however, there are maturing tree belts on the south side of the motorway corridor which, together with topography and the presence of the Woodcut Farm sheds would substantially restrict the opportunity to observe the proposed building given its roofscape would be no higher than the Woodcut scheme. Where visible, only small elements of the proposed building would be observed and form a backdrop to the Woodcut Farm development.
- 7.14. Further north of the motorway is the HS1 rail line which will afford train passengers the opportunity to gain southward views. Again, only small elements of the proposed building would be observed and this would be in the context of forming background to the Woodcut Farm Business Park. There is a network of roads associated with the Maidstone Services Area, however, these roads and parking areas are heavily framed by maturing tree belts and as such, there would be little opportunity to observe the proposed scheme.
- 7.15. The next nearest highway is approximately 2km north of the site within the AONB which forms a narrow country lane which runs from the south from Bearsted northwards up and over the AONB escarpment to the hamlet of Friningham. There is also another road running east-west along the base of the escarpment slope known as Pilgrims Way. These routes are flanked by hedgerows and tree cover and as such, the views tend to be channelled along the direction of travel. There would be little opportunity to observe the proposed building in this viewing context.

- 7.16. With regard to public rights of way, I would note the following. There are no public rights of way immediately to the north of the site. the nearest one being a byway linking Woodcut Farm to the A20 Ashford Road. There is another bridleway located further west of this approximately 1km to the west of the site which links the Ashford Road to the south and passes northward under the motorway and HS1 to extend into the AONB northwards. Both these routes are flanked by mature hedgerows and trees. The new Woodcut Farm development would substantially screen the proposed building from these two routes.
- 7.17. There are a number of footpaths north of the rail line and service area in the vicinity of Snarkhurst Wood which forms local high ground which is heavily wooded. There is a substantial amount of tree cover in the form of woodlands and tree belts which would substantially limit the opportunity to observe the proposed building from these routes.
- 7.18. Further north at approximately over 2km from the site are a number of public rights of way which extend over the escarpment slope, together with a long-distance North Downs Way which runs along the crest of the escarpment slope. These routes provide elevated and panoramic views over the lower landscape to the south and reveal countryside heavily punctuated with a variety of built infrastructure. From a number of these routes the proposed building would be seen in the context of the Woodcut Farm buildings and would form a very small element within the views resulting in a negligible degree of effect from a limited section of the escarpment.

Views of the Proposed Scheme from Land to the South

- 7.19. Immediately to the south of the site and forming its southern boundary is the A20 Ashford Road. It is barely visible on the ground and appears to be little used. Maturing tree cover and shrubbery at the eastern end of this section would substantially screen the proposed building given the proximity of the vegetation to road users travelling east bound on the slip road. The western end of the site boundary is currently open in aspect with views across the site from where the proposed development would be clearly visible but with the backdrop of the Woodcut Farm Business Park. Planting is proposed with trees and under storey to form a landscape framework, which would screen much of the proposal, building and car park. There is the potential to develop a woodland tree belt along the southern boundary such that there would be limited visibility of the proposal from this adjacent road in the medium and long term.

- 7.20. There is only one other road to the south of the site, Old Mill Road (or Lane), which I address separately below given it is specifically referenced in the Reason for Refusal.
- 7.21. Immediately to the site of the site are two pastoral fields, which are crossed by a public footpath, which connects, to the A20 Ashford Road. Users of this route when arriving at the road have to walk alongside the road as the PRow terminates at this location. The sudden end of the route connects with the Old Mill Road, again users would continue along this road as the PRow also terminates at this road. Pegasus undertook a recreational survey of this route, see appendix 12 over several days and time periods throughout which the footpath was not used, showing the low recreational value that this route currently provides. From this footpath in the northern field there would be views across the A20 to the proposed building with the Woodcut Farm buildings in the same viewing context. This would also be the case with northward views in the southern field but with the benefit of greater vegetation screening with installed standard trees. With maturation of this vegetation off-site, together with tree planting along the southern boundary, the proposed development would be increasingly screened over time like that of Woodcut Farm development.
- 7.22. A short distance further south lies a further public footpath which extends from Old Mill Farm to the south to the A20 roundabout junction in the north. At its northern end a stile defines the route through highway tree planting though the path through the shrubbery is challenging whereupon arriving at the highway there are no roadside pavements at this busy junction and users would have to walk on the road surface itself. At the southern end the route picks up a farm track to connect to Old Mill Road. Given the alignment of the route, it sits to the east of a ridge of local high ground, this topography in combination with vegetation, tree cover and hedges would restrict and prevent any views of the proposed building from this route. As a guide the Woodcut buildings and highway lighting columns are not visible.
- 7.23. Whilst a recreation survey of this route was not undertaken, there is no evidence to indicate it is currently used given the route is severed and terminated by the A20 junction. There are a number of other public rights of way further to the right extending over local high ground, however topography and tree cover restrict viewing opportunities to limited glimpsed views in the context of Woodcut buildings, see viewpoints 9, 10 and 11 (appendix 6).

Views of the Proposed Scheme from Land to the East

- 7.24. To the east of the site the landscape accommodates a network of roads and junctions associated with the A20 and the M20. The motorway to the east is set down in a cutting with the adjacent banks planted with maturing tree belts. Similarly, the A20 to the east is also framed by mature woodland and tree belts such that there would be limited opportunity to observe the proposed building.
- 7.25. In respect of public rights of way, there are no public rights of way immediately to the east between the A20 and the M20, however, there are several footpaths to the east of the HS1 between the Maidstone services and the village Eyhorne. However, these routes are flanked by hedgerows and trees, this together with built form and tree cover, topography in the intervening landscape would result in little opportunity to observe the proposed building, see photo viewpoints 2 and 8 (appendix 6).

Views of the Proposed Scheme from Land to the West

- 7.26. Immediately to the west of the site lies the A20 Ashford Road. For road users travelling eastbound, the proposed building would only be visible from a short section of this highway in the vicinity of the site as tree cover and hedges, buildings, topography would limit views towards the site. 1km west of the site lies a residential road, Caring Lane which accommodates ribbon residential development. This highway would be visually unaffected due to tree cover, topography and built form.
- 7.27. In terms of public rights of way, there are none immediately to the east of the site with the nearest route being located at 1km distance which orientated north-south links Bearsted to the north with Merrihill and Caring hamlets to the south. Again, topography, vegetation and built form would severely limit visibility of the proposal from this route and others in this locality, see photoview 11 (appendix 6).

Summary of Visual Effects

- 7.28. It is evident from the LVA and confirmed by my own visual analysis that the proposed scheme would be visually well contained due to the surrounding tree cover, topography and existing built infrastructure.
- 7.29. The visual assessment demonstrates that visibility would be restricted by a combination of the landform, distance from the site and the enclosure provided by intervening vegetation



surrounding the site together with built infrastructure. The proposed scheme would not be readily perceptible from many publicly available viewpoints and the layering effects of intervening vegetation would successfully integrate the proposed scheme into the landscape particularly over time with maturation of the mitigation tree planting.

- 7.30. Having reviewed the LVA information and assessed the scheme in the field myself, I consider that the geographical extent of visibility associated with the proposal would be limited and local to the site. Where partially visible the scheme would be generally seen in the context of the adjacent Woodcut Farm development.

8. Summary and Conclusions

Introduction

- 8.1. I am instructed on behalf of Wates Developments ('the Appellant') to present evidence relating to landscape and visual matters in respect of this Inquiry relating to an application for outline planning permission, which was submitted to Maidstone Borough Council and validated. The application proposed the following:

“Outline application for the erection of a building for storage and distribution (Class B8 use) with a floor space up to 10788sqm (gross external area), ancillary offices, associated car parking, HGV parking, landscaping and infrastructure (all matters reserved except for access).”

- 8.2. My Landscape Proof of Evidence comprises this document together with separate appendices.

Planning Policy Context

- 8.3. This evidence should be read in conjunction with the Planning Proof of Evidence prepared by Asher Ross. The second Reason for Refusal cites policies in the Maidstone Borough Local Plan and Policy SD8 of the Kent Downs AONB Management Plan as well as paragraphs 174 and 176 of the NPPF. I have reviewed these policies and am aware of their planning context as far as my discipline is concerned addressing landscape and visual effects. I have been mindful of the wording in these policies together with their supporting text, whilst drafting my Proof of Evidence. I recognise it is for planners to determine the weight that should be applied to these policies and my analysis set out in this Proof of Evidence and appendices.

Description of the Scheme

- 8.4. The site can be described as a distribution warehouse set within green infrastructure which includes native tree planting. The proposed building is designed to have an overall height of 67.5m AOD which would be seen in the context of the adjacent development at Woodcut Farm which is 68.2m AOD. This proposal would be restricted to a maximum height of 67.5m AOD with the height of the building determined by the slab level datum. The proposal would deliver a high-quality scheme, both in terms of its built form and in terms of the green infrastructure that is proposed around the perimeter of the site.

Effect on Landscape Elements

- 8.5. The site forms a single arable field with no internal landscape features. The existing tree belts and hedgerows define the boundaries of the site in most places, all of which as off-site vegetation would be retained. The proposal would have a bearing upon a number of landscape elements. The land cover and land use would be lost to accommodate the proposal. A substantial amount of new tree cover would be introduced along with some hedgerows, all of which would form a naturalistic environment comprising indigenous shrub and tree species. The topography would change from a gently sloping site to one essentially level to accommodate the development platform for the building and areas of hard standing. The proposal would result in some beneficial effects with regard to landscape elements within the site, specifically hedgerows and tree cover. The scheme would inevitably result in the loss of some arable land, comprising one field. There would be no change to landscape elements beyond the site. There is the opportunity to introduce tree planting off-site on the south side of the Ashford Road, see appendix 10. There would be a moderate adverse effect on the character of the site itself and immediate environs.

Effects on Local Landscape Character

- 8.6. With regard to landscape character, the site and its immediate surroundings fall within the **National Character Area, the Wealden Greensand, NCA 120** and locally within the **Leeds Castle Parklands (LCA 49) and White Heath Farmlands (49-2)**. The key characteristics that define the local landscape characters beyond the site would remain physically unaffected (including experiential aspects), and there would be no change to the landscape character of the area beyond the site and its immediate environs with the proposed scheme in place. The effect on landscape character beyond the site and its immediate environs would be negligible.
- 8.7. The site is proposed to accommodate a distribution warehouse which would be of high quality design and would reflect other large-scale buildings in the locality. The proposal would result in a change to the character of the site, an inevitable consequence of accommodating housing on a greenfield site and thus resulting in a moderate (adverse) degree of effect, as it relates to the site itself and would be limited and highly localised.
- 8.8. Regarding the proposed green infrastructure, the proposal would bring about a degree of change in character that would be beneficial reflecting tree belts and hedgerows in the

locality. This planting would be beneficial in nature in effect. Additional tree planting off-site would reinforce the rural character of the adjacent fields to the south of the site.

Effects on Visual Amenity

- 8.9. In terms of how the proposed scheme would have a bearing upon general visual amenity, I would note the following main observations. The potential to observe the scheme in terms of the visual envelope would be mainly restricted to the immediate environs of the site and contained within the local landscape. As such, the proposed building would have a limited visual envelope. Where observed, the proposed scheme would be generally framed and screened by built form including the Woodcut Farm Business Park, together with existing tree cover and hedges in the area.
- 8.10. Where observed, it would generally be seen in the context of adjacent industrial development, Woodcut Farm. This means that the proposed scheme would not visually extend the visual envelope of the existing Business Park as it relates to the wider landscape but rather it would fall within the existing visual envelope associated with the wider environs. The degree of effect would be quite limited and localised.
- 8.11. As for the nature of effect with regard to visual amenity, I adopt a precautionary approach and assume that the nature of effect would be adverse in overall terms even though the landscape design scheme itself would be attractive and beneficial.
- 8.12. The proposal would result in some physical loss of arable land. The proposals would result in a change to the appearance of the local landscape. The visibility of the building would be seen alongside Woodcut Farm and be in keeping with the general visual appearance of the area. Once the green infrastructure is established and has the opportunity to mature, the proposals would have an increasing screening effect with regard to the site and as appreciated visually within the local environs. The proposed development would have some limited and highly localised visual adverse effects. I address the AONB later.

Effect on the Character of the Countryside (RfR)

- 8.13. At the National Level, the site and the surrounding area falls within the Wealden Greensand reference 120 which is an extensive area of landscape which envelopes Maidstone settlement. This landscape whilst having essentially a rural character, is heavily punctuated by a wide variety of built infrastructure. With the proposed scheme in place, the overall defining

elements that collectively form the general character of this landscape would not change with the proposed scheme in place. The proposal would, in effect, have a negligible effect upon this National Landscape Character Area.

- 8.14. At the more local level, the Kent Strategic and Maidstone Landscape Character Assessments provide a more granular level and identify a number of Landscape Character Areas. The site itself sits within a small Landscape Character Area and Landscape Character Type. This includes the land immediately to the north which is now characterised by the Woodcut Farm Business Park whilst further to the west lies recently constructed office development and caravan park (Bearsted Caravan Club) as well as a car maintenance site, Bearsted Autos. The local character area extends north to also include the M20 motorway corridor. Immediately to the north-east of the site lies junction 8 of the M20 and further eastward lies the village of Eyhorne Street. Immediately to the south of the site in the same area lies the A20 junction and motorway slip roads and further east of which lies a large hotel complex (Mercure) complete with heliport.
- 8.15. It is notable that the local landscape area accommodates both the A20, Ashford Road together with the M20 motorway and forms a major transport corridor punctuated with highway infrastructure including high-level lighting columns, large signage and overhead gantries. Whilst the area is essentially countryside, it is heavily punctuated with a wide variety of built infrastructure, with those elements in the immediate vicinity of the site having a strong urbanising influence upon it.
- 8.16. The introduction of the proposed building, and car parking would not introduce a feature that is out of character with this local character area. Indeed, it would be in keeping with the adjacent Woodcut Farm development. Whilst the composition of views would change with the proposed scheme in place, the overall character that defines the local environment in terms of green and built infrastructure would not materially change with the proposed scheme in place. The character of the site would change from an isolated arable field to a business park environment, an inevitable consequence of this proposed development on a greenfield site resulting in a moderate adverse effect on the landscape character of the site itself. Beyond the site and its immediate environs, the effect on the local character of the area would be negligible (adverse) in terms of degree of effect.

Effect on Appearance of the Countryside (Visual Amenity) (RfR)

- 8.17. The proposal would have a bearing upon local visual amenity, however, effects upon views would be limited and highly localised with the exception of some distant views from the AONB which would be affected to a negligible degree given the viewing context and distance. The proposed building has been carefully located with regard to firstly, site selection and secondly, design with regard to the layout within the site itself. The site benefits from a strong development context framework, together with the existing landscape such that the proposal would have a limited visual envelope. In summary, the Woodcut Farm development immediately to the north would visually screen the proposal in terms of views from the north and close proximity to the site. Visibility of the proposal from the landscape to the west of the site would quickly fall away over a short distance due to built form, vegetation and topography.
- 8.18. In terms of views from the east, there would be few locations from where to observe the proposed building with public viewpoint locations primarily associated with major highways where speed and concentration, together with direction of travel are the priority and sensitivity to such development being low. Where the building would be observed over short range distances, it would be seen in the context of highway infrastructure with the Woodcut Farm as a backdrop. Views from the south are similarly restricted due to tree cover, built form and topography.
- 8.19. A short section of Old Mill Road nearest to the site and the A20 road frontage would have views of the building, but it would be generally seen as a small element within the viewing context of the Woodcut Farm buildings. The nearest footpath to the south of the site which would afford close range views, has no evidence of use, nor has a further public footpath further south terminating at the A20. As a result, little weight can be attached to the effects on these paths. In terms of the landscape to the north, this is heavily wooded. The tree cover, built form and topography would limit short and mid-range views of the proposed building in the vicinity of Maidstone Services and Snarkhurst Wood.
- 8.20. At over 1km to the north of the site lies the AONB escarpment, where elevated views from some sections of public rights of way would afford visibility of the proposal, though this would be from a small element in the wide panoramic views which currently reveal a landscape heavily punctuated with built infrastructure including Maidstone in the distance and Woodcut Farm adjacent to the site. The muted colours associated with the building design

would further ensure the building was seen as recessive and not visually prominent in such views. Whilst there would some change in the view from the AONB escarpment, the overall defining character of the landscape beyond the AONB would remain materially unchanged with the proposed scheme in place. Effects upon views from the AONB escarpment would be negligible adverse.

Effect on the Setting of the AONB in Views from Old Mill Road (RfR)

- 8.21. The northern part of Old Mill Road affords northward views due to a lack of roadside hedgerow. This view reveals fields in the foreground and Woodcut Farm development in the middle distance. With the proposed scheme in place, the building would be seen in the same viewing context as Woodcut Farm development. The lighting columns associated with the A20, Ashford Road would sit in the foreground of the proposed building with their light units sitting in line or above the building roofline. The building would screen tree cover north of the site associated with the motorway and Maidstone Services but it would still sit below the horizon and the general legibility of the AONB escarpment slope would remain seen beyond the trees in the middle distance. It is this scarp which is considered to be a key defining feature of the AONB and visibility of this would continue to prevail with the proposed building in place with no major adverse effect upon visual amenity in this regard as far as views towards the AONB and its setting are concerned. The proposed scheme would conserve the visual amenity as it relates to the visual setting of the AONB in terms of views of the escarpment.
- 8.22. Views towards the AONB in the locality of the site are generally restricted to glimpsed and fleeting views in the main with regard to public rights of way and local highways. A short section of the northern part of Old Mill Road affords some views towards the AONB escarpment. Such views are contextual, see viewpoint 6 photomontage, appendix 11. The foreground is defined by several fields and the middle distance is defined by Woodcut Farm development, whilst in the vicinity of the site there is a concentration of high level lighting columns beyond which lies a line of mature tree canopies and it is only beyond these tree canopies that the AONB escarpment is observed in the far distance revealing grassland and woodland on the highest rising ground.
- 8.23. The proposed building would be located in the middle ground situated in front of some of the lighting columns and tree cover. It would allow views beyond to the upper slopes of the escarpment such that the legibility of the escarpment forming the far horizon would remain

with the proposed scheme in place. The landscape scheme, revision E would introduce tree cover in the site frontage which would partially screen and soften the appearance of the building.

- 8.24. With the benefit of the off-site tree planting and further woodland planting associated with the site frontage, (Revision F) this tree cover would increasingly screen both the proposed building and adjacent Woodcut Farm development reducing the visual profile of these buildings in the middle distance in the medium and longer term. The proposal would conserve the setting of the AONB with regard to views from the Old Mill Road, with either planting design.

Views from the AONB Escarpment (Scarp Slope)

- 8.25. There are a number of public rights of way extending along the escarpment to the north-east of the site. However, a short distance to the north of the site lies Snarkhurst Wood which extends over some local high ground and as a result, from much of the escarpment to the north-east, the proposed scheme would lie on the lee side of this local topographic feature and effectively screened from views from much of the AONB escarpment which probably explains why the AONB have identified the one viewpoint 12 in their response. In light of this overall analysis, I consider that the proposal would have a negligible effect upon the visual amenity as experienced from the AONB and in particular, its escarpment. The landscape character of the AONB itself would remain physically unchanged with the scheme in place even taking into account experiential and perceptual elements. Furthermore, the identified special qualities associated with the AONB would be conserved with the proposed scheme in place.

Conclusion

- 8.26. For the reasons stated above it is my view that on landscape and visual grounds there are no substantive reasons for refusing planning permission for the proposed distribution warehouse scheme on land adjacent to the A20, Ashford Road. Therefore, the Inspector is respectfully requested to uphold the scheme and allow the grant of planning permission so far as landscape and visual issues are concerned and as this relates to the setting of the AONB.



Appendices

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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