



**DEADLINE 9 RESPONSE**

**KENT DOWNS AONB UNIT RESPONSE TO**

**APPLICANT'S SUBMISSIONS AT DEADLINE 8**

**9.192 Applicants Responses to the Examining Authority's**  
**Third Written Questions (ExQ3) [REP8-115](#)**

**Interested party Ref no: 20035310**

**ExQ3\_Q12.2.1 To Applicant**

**Compensatory woodland planting and wider effects on the Kent Downs AONB landscape**

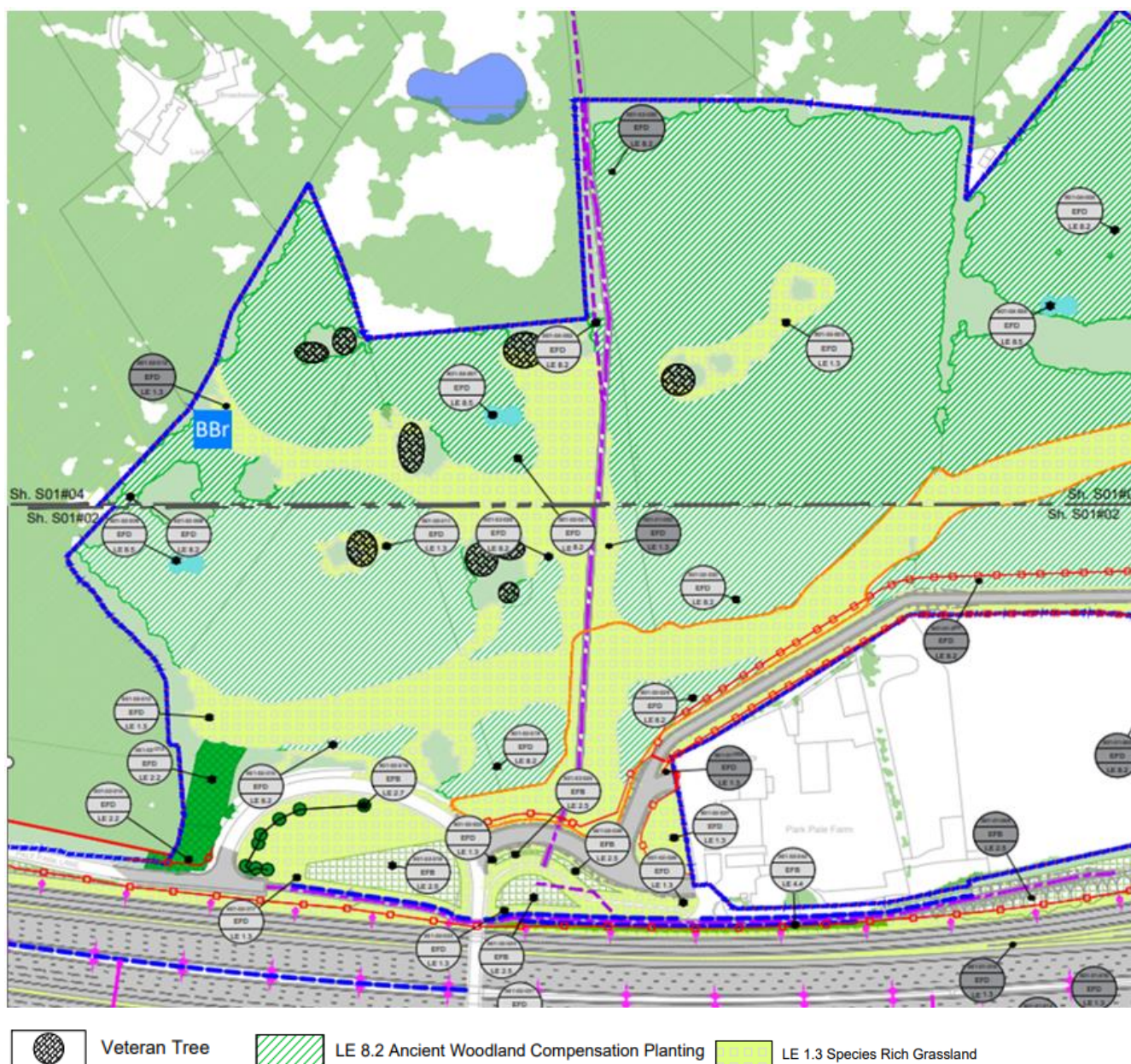
**Can the Applicant please direct the ExA to where it can find the assessment of the effect on the landscape character of the proposed woodland planting site between Brewers Road and Great Crabbles Wood to the north of Park Pale? The ExA notes that the area in question retains a former historic parkland character and not a woodland character. It would like to understand where the assessment of the impacts of compensatory woodland planting on the existing landscape character in this location has been reported?**

**Several IP's have raised concerns that the landscape scale strategy for compensatory woodland appears to relate to solely to ecological factors and does not consider the effects of compensatory woodland sites on the landscape character, visual amenity or cultural heritage of the AONB. The ExA asks the Applicant to direct the ExA to where it can specifically find the reporting of the wider assessment or to explain why such an assessment has not been undertaken. The Applicant should note that simply referring the ExA to other ES chapter references will not be adequate; the ExA would like specific reference points to the relevant assessments if these have been undertaken.**

## Park Pale

The AONB Unit strongly contests the assertion set out in the Applicant's response to this question that the existing individual and groups of trees that contribute to its historic parkland character 'would be set within an open ride/glade type character'.

The relevant extracts from Sheets 2 and 4 of the Environmental Masterplan for Sections 1 and 1A [REP4-124] reproduced below. As can be seen in these figures, the existing trees are almost without exception, subsumed either wholly within proposed new woodland planting or the new woodland planting would be located immediately adjacent to the retained trees, so that they would not be apparent as individual specimens or stands of parkland trees. As a result of this, the current historic parkland character would be lost.



The Applicant justifies the acceptability of the woodland planting on landscape character in on the basis of the West Kent Downs: sub-area Shorne LLCA having the identified key

characteristic of extensive areas of woodland and a strong sense of enclosure created by this woodland. It is on this basis, it is advised that *‘the proposed planting in this area is therefore not considered to be out of character for the West Kent Downs (sub area Shorne) LLCA.’* While the AONB Unit recognises that the West Kent Downs Sub area of Shorne LLCA is a generally wooded landscape, this justification is considered wholly inappropriate and fails to take into account the more nuanced specifics of the landscape character of this small part of the LLCA that makes a wholly positive contribution to the landscape and scenic beauty of this part of the AONB that would be lost as a result of the proposed compensation planting in this location.

#### Bluebell Hill and Fenn Wood Compensatory sites

The AONB Unit has no concerns or comments in respect of the assessment for the Bluebell Hill and Fenn Wood compensation sites on the landscape of the AONB.

### **ExQ3\_Q16.1.3 To Applicant**

#### **Green Bridges: serving multiple objectives**

**ExQ3 11.1.5 and 11.1.6 refer to the functions of the proposed Green Bridges in relation to biodiversity and habitat connectivity. However, evaluation of the proposed Green Bridges requires consideration of their performance in terms of multiple objectives and outcomes, including but not limited to:**

- **Biodiversity**
- **Habitat connectivity**
- **The provision of non-motorised user (NMU) routes for people**
- **Landscape and landscape mitigation, in general terms and (with reference to the Kent Downs) to AONB landscapes.**

**With reference to these objectives but also to such other functions and outcomes as are considered relevant, please provide your summary assessment of the effectiveness of each Green Bridge proposed within your area of interest. If objectives and outcomes appear to be in competition or to pull in different directions, please indicate the particular objectives considered to be the most important and why.**

In their response to this Question, it is notable that the Applicant still refers to ‘green stripS’ being provided which infers planting along both sides of the Thong Lane and Brewers Lane Green bridges. The Design Principles were amended at D7 however and no longer specify that green elements need to be provided along both sides of both the Thong Lane south and Brewers Lane Green bridges.

The Applicant advises that the green strips would *‘also help to screen views of traffic on the bridge from within the surrounding landscape, as well as screening views for users of the bridge towards the modified A2 corridor’*. However, if planting is now only provided on one side of the two bridges, this would clearly reduce both the effectiveness of these aspects to one side only.

The AONB Unit remains of the view that the landscaping provision on both the Brewers Lane and Thong Lane south Green bridges remains woefully inadequate to meet the stated outcomes in the Applicant’s response to provide a positive and pleasant experience for

recreational users or reduce the 'perception of landscape severance', as set out in our response to ExQ3\_Q16.1.3 [\[REP8-140\]](#).



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11 December 2023