Farningham Parish Council

Pedham Place, Sevenoaks
Landscape and Visual Evidence Base Review

Draft report
Prepared by LUC
September 2026

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250 Waterloo Road
London SE1 8RD

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Chapter 1
Introduction

1.1 LUC was appointed by Farningham Parish Council in September 2026 to undertake a review of the Landscape and Visual Evidence Base prepared by ARUP, on behalf of Sevenoaks District Council (SDC), to support the allocation of Pedham Place in the (Draft) Local Plan 2040.

1.2 The following documents form part of the Evidence Base of the Regulation 19 process of the Local Plan which is currently under consultation:

- Landscape and visual evidence for the Sevenoaks Local Plan 2040 Main Report (November 2024);
- Site Assessments Appendix (November 2024); and
- Natural England Consultation Response – Arup Technical Note (July 2026).

National Planning Policy Framework

1.3 Polices N1 and N4 of the National Planning Policy Framework (NPPF) (2026) set the national policy context of relevance to this review.

1.4 Policy N1 (Identifying environmental opportunities and safeguards), part (c) notes that Development Plans should "*Steer the location of development, including through site allocations, in ways which utilise land of least environmental value…This should include limiting the scale and extent of development within Protected Landscapes. Substantial weight should be placed on the importance of conserving and enhancing the natural beauty of these areas, and to conserving and enhancing wildlife and cultural heritage in National Parks and the Broads.*"

1.5 Paragraph 1 of Policy N4 (Protected Landscapes) notes that "*Development proposals within Protected Landscapes should be limited in scale and extent and sensitively located and designed to avoid harm to the statutory purposes and special qualities of the Protected Landscape….*" Paragraph 2 notes that "*Proposals for major development within Protected Landscapes should be refused other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest.*" Consideration of whether 'exceptional circumstances' exist should include an assessment of "*Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which it could be moderated.*"

Local Plan Context

1.6 SDC is preparing a new Local Plan to address the period through to 2040 (Local Plan 2040). SDC commissioned Arup to prepare landscape and visual evidence to assist in the preparation of future plan-making.

1.7 The Landscape and visual evidence for the Sevenoaks Local Plan 2040 Main Report (November 2024) provides a comparative assessment of three options that are being considered to deliver new housing. These options are:

- Option 1 – Residential development within nine sites on the edge of Sevenoaks, Westerham and West Kingsdown;
- Option 2 – Standalone mixed-use settlement at Pedham Place; and
- Option 3 – Combined approach of Options 1 and 2.

1.8 The study considers ten sites (including Pedham Place) and provides an indication of the likely sensitivity and potential effect of development with respect to landscape and views. All Option 1 sites are located on the edges of settlements, and the Option 2 site is adjacent to a settlement. All of the sites are within the Kent Downs National Landscape.

Pedham Place

1.9 The proposed development site at Pedham Place is a potential large free-standing settlement with capacity for over 2,500 homes. The site straddles the boundary between Farningham Parish Council and Eynsford Parish Council.

1.10 A description of the proposed development site at Pedham Place is described in Appendix A - Site Assessments. The site comprises Pedham Place Golf Centre which is located to the south-east of Swanley, situated outside the settlement boundary, and is bounded by the M25 to the west.

Methodology for this review

1.11 This review focuses on an examination of the landscape and visual evidence base documents and supporting appendices and figures. This review will:

- Provide an overview of the general report structure and scope;
- Review the landscape judgements (including whether the baseline information is complete, whether judgements on sensitivity and value are appropriate, whether the methodology for assessment is appropriate, whether effects are objectively assessed);
- Review the visual judgements (including whether they captures the key receptors, whether representative and sufficient, whether the methodology for assessment is appropriate, whether effects are objectively assessed);
- Review the supporting Appendices and make any comments about accuracy and whether they are in line with Landscape Institute guidance;
- Review the Technical Note response to the Natural England Response (January 2026); and
- Summarise any clarifications/ additional information required.

1.12 This review is concerned with the method and approach to assessing landscape and visual matters and the judgements made in the landscape and visual evidence. The review does not consider compliance with the NPPF (2026), this being a judgement to be made ‘in the round’ by planning professionals.

Chapter 2
Landscape and Visual Evidence Base Review

2.1 This chapter presents a review of the Landscape and Visual Evidence Report ('the Evidence Report') and its supporting appendices. The review considers the approach set out in the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment, 3rd Edition ('GLVIA3')[1] and broadly follows Technical Guidance Note 1/20: Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)[2], noting that the Evidence Report is a strategic study and not an LVIA.

Report structure

2.2 The Evidence Report forms a comparative assessment of ten potential development sites, which are packaged into three options. The Evidence Report comprises the following sections:

- Section 1 Executive Summary;
- Section 2 Introduction;
  - Context;
  - Approach;
- Section 3 Site Assessments;
  - Cumulative Assessment for Option 1 Sites; and
- Section 4 Options Assessment.

2.3 The report is supported by appendices:

- Appendix A - Site Assessments;
- Appendix B - Methodology; and
- Appendix C - Document and Data Review.

Scope of the assessment

2.4 This section identifies whether the scope of the assessment in the Evidence Report is clearly set out and explained.

2.5 Section 2.2 of the Evidence Report explains that LVIA can be applied formally or informally and at different scales. Further, the report notes where GLVIA3 sets out that the principles of LVIA can be applied as part of plan-making, for example through Strategic Environmental Assessment (SEA) in support of development plans. It acknowledges that assessment as part of SEA will be more strategic and generic,

[1] Guidelines for Landscape and Visual Impact Assessment, 3rd Edition ('GLVIA3')

[2] https://landscapeinstitute.org/wp-content/uploads/2026/03/20-1-Reviewing-LVIAs-and-LVAs-Final.pdf

as there is no clearly specified project to be assessed. This aligns with GLVIA3 (paragraph 1.13).

2.6 Section 2.2 explains that the scope of this assessment has required a hybrid approach which considers potential effects of hypothetical developments on specific sites, both individually and together, and a more strategic consideration of the potential effects on the Kent Downs National Landscape to support the plan-making process. Given the lack of detailed design at this stage, this approach is reasonable and proportionate.

2.7 As set out in Appendix B - Methodology, paragraph B.1.5.5, the Evidence Report is intended to support the plan-making process and does not constitute a full LVIA for each site. The report notes that impacts cannot be defined in detail at this stage, because the detailed proposals are not known. Instead, the assessment combines judgements on the sensitivity of the landscape and visual amenity with mitigation as a broader consideration of likely effects by considering the development parameters. Given the lack of detailed design at this stage, this approach is reasonable and proportionate. An LVIA would be expected to be provided as part of any future planning application.

Assessment methodology

2.8 This section identifies whether the methodology for the Evidence Report is sufficient and complete. A detailed methodology is provided in Appendix B - Methodology of the Evidence Report and a summary of the methodology is provided in Section 2.2.

Guidance

2.9 Appendix B - Methodology sets out that the Evidence Report was informed by the following guidance, which is appropriate:

- Landscape Institute and Institute of Environmental Management and Assessment (IEMA), Guidelines for Landscape and Visual Impact Assessment, 3rd Edition, 2013 (GLVIA3)
- Landscape Institute, Notes and clarifications on aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA), 2024
- Landscape Institute Technical Guidance Note (LI TGN) 02/21: Assessing landscape value outside national designations, 2021
- Natural England, Guidance for assessing landscapes for designation as National Park or AONB in England, 2021
- Natural England, An approach to landscape sensitivity assessment – to inform spatial planning and management, 2019
- Ministry of Housing, Communities and Local Government, National Design Guide, 2019

Development Parameters

2.10 Appendix B - Methodology, paragraph B.1.3 confirms that common development parameters were used as part of the assessment of each site to ensure each site was assessed separately in a consistent way. This is appropriate given the lack of detailed design at this stage.

Site Assessment

2.11 Paragraph B.1.5 confirms that assessment of each site follows a structured process which draws upon the existing landscape evidence in published character assessments and the Sevenoaks Landscape Sensitivity Study, 2017. This is appropriate.

2.12 The results of each site assessment are presented in Appendix A – Site Assessments, and summarised in the Evidence Report. For each site, the following aspects were considered:

- Context;
- Landscape Sensitivity;
- Visual Amenity;
- Potential Effects and Mitigation;
- Drawing Conclusions; and
- Guidance and opportunities.

2.13 The site assessment was informed by field surveys from publicly accessible locations, which is appropriate and in line with GLVIA3.

Significance of Effects

2.14 Judgements on the significance of effects are based on the criteria set out in Table 4-3 of Appendix B - Methodology:

- Low (defined as no significant effects)
- Medium (defined as some significant effects)
- High (defined as substantial significant effects)

2.15 Although the criteria are clearly defined, a combined judgement is made for landscape effects, visual effects and effects on the special qualities of National Landscapes. Although GLVIA3 recommends that landscape and visual effects are considered separately, the combined judgement is proportionate to the strategic nature of the Evidence Report.

2.16 The site assessments focus on long-term, operational effects, which is appropriate given the strategic scale of the study.

Limitations

2.17 Limitations of the study are set out in Appendix B - Methodology, section B.1.6.

Scoping and consultation

2.18 The Sevenoaks District Local Plan has undergone several rounds of consultation. The table below summarises Natural England's response to the Regulation 18 consultation, Arup's subsequent technical note, and any further information required to make a judgement about site allocation.

Table 2.1: Summary of Natural England Consultation and Response

Natural England Comment (Regulation 18 Consultation)	Arup Response (Technical Note, dated July 2026)	LUC Response / Further Information Required
2.1 Scope of assessment "*…it is currently unclear which of these options are likely to come forward, if such measures are capable of outweighing the potential harm caused by the development…*" (Annex 3, p34)	Arup note that the Evidence Report does not make any assessment or recommendations regarding the planning balance or assess whether mitigation would outweigh harm, as this would be determined through subsequent stages of assessment and decision-making.	LUC agrees that recommendations regarding the planning balance or whether mitigation would outweigh harm would be determined through subsequent stages of assessment and decision-making. No further information required.
2.2 Sufficiency of evidence and need for further work "*…we do not currently feel that there is sufficient justification… and therefore advise that more evidence is provided…*" (Annex 3 p35)	Arup note that the Evidence Report provides a proportionate level of evidence appropriate to this early stage of plan-making, and that further work, including detailed design development and project-level LVIA, will be required to refine the assessment, quantify effects, and test mitigation as the proposals evolve.	LUC agrees that further justification is required in relation to Pedham Place being the preferred option, particularly in terms of the judgement that it will result in the least harm to the Kent Downs National Landscape.
2.3 Relative performance of options "*…causing less harm than other options does not justify the adverse impacts that are likely to occur…*" (Annex 3 p35)	Arup note that each site was assessed on its own merits, based on assumed parameters and principles. A comparative exercise was then undertaken to distinguish between the relative landscape and visual performance of the three options considered. The identification of Pedham Place as the option which is considered to represent the least potential for harm overall was intended to assist the Council in selecting options to take forward into the new Local Plan. It does not disregard the need for development proposals to further assess or justify the adverse effects identified or to apply the mitigation hierarchy in seeking to avoid or minimise these effects.	LUC agrees that each site was assessed on its own merits, but considers that further justification is required in relation to the judgement that the Pedham Place option will result in the least harm to the Kent Downs National Landscape. The Evidence Report acknowledges that harm to the National Landscape is only justifiable in exceptional circumstances.
2.4 Role of mitigation in the assessment "*…we have concerns about this being reduced to Low-Medium with the additional mitigation measures… it does not appear that the impacts can be avoided or fully mitigated.*" (Annex 3 p36)	Arup note that the Evidence Report identifies potential mitigation and enhancement measures and considers their likely influence at a strategic level, consistent with its role in informing plan-making. The reported reductions in effect (e.g. to Low-Medium in the case of Pedham Place) were derived through the assessment undertaken at this strategic stage with the level of	It is not possible to avoid or fully mitigate effects on the National Landscape, given the site location. Further work, including LVIA, will be required to identify suitable mitigation measures should the site be developed.

Natural England Comment (Regulation 18 Consultation)	Arup Response (Technical Note, dated July 2026)	LUC Response / Further Information Required
	available information at the time, based on a defined development scenario incorporating embedded mitigation and potential enhancement measures.	
2.5 Limitations of mitigation "*…there are some effects that it would not be possible to mitigate for, with potential for substantial effects on landscape character…*" (Annex 3 p35)	Arup note that the Evidence Report acknowledges that certain effects cannot be fully mitigated, reflecting constraints such as the scale of proposed change, the openness and exposure of parts of the site within the wider landscape, and the sensitivity of key views and landscape character.	The Evidence Report acknowledges that "*There is potential for mitigation to reduce the significance of effects on the special qualities, but for most sites it is considered that significant effects would remain*" (Section 3.1.2). Further justification is required regarding the judgement that potential mitigation at Pedham Place, comprising setting the development back from the southern and eastern parts of the site and woodland planting along the steep south and east facing ridges, would reduce effects from High (i.e. 'substantial' significant effects) to Low-Medium (between some and no significant effects). This is because the edges of the site slope steeply to the south and east towards the Darent Valley and as noted in the site appraisal "*Some parts of the site towards the south and east are open and exposed, with long-distance views and it is likely that any development in these locations would be widely visible*". The Evidence Report does not account for the time it would take for new woodland planting to mature, resulting in significant effects being experienced in the long term.
2.7 Contribution to special qualities of the National Landscape "*…The site currently contributes to the natural beauty of the Kent Downs National Landscape and its special qualities…*" (Annex 3 p37)	Arup note that the Evidence Report recognises that the site lies within the National Landscape and that development has the potential to affect the natural beauty and special qualities of the designated area, including changes to openness, visual prominence within the landscape, and perception of rural character.	The Evidence Report identifies the special qualities of the Kent Downs National Landscape (listed in Appendix B - Methodology). A thorough and consistent appraisal of the contribution of the site to the special qualities of the National Landscape is provided in Appendix A – Site Assessments, along with an assessment of potential effects on the National Landscape. Opportunities to further the statutory purposes of the Kent Downs National Landscape are also identified for each site. No further information required.

Baseline content, including sensitivity

2.19 This section identifies whether the baseline information provided for each site is sufficient and complete.

Study area and ZTV

2.20 As set out in Appendix B - Methodology, paragraph B.1.5.3, a 500 m buffer zone was established to consider the impact of proposed development allocations on close-distance views for the most sensitive visual receptors. Potential views

from promoted routes and particularly important viewpoints within 3 km were also considered. This is considered to be proportionate to the scale and nature of the proposed allocations.

2.21 The ZTV maps provided for each site appraisal extend to 3 km from the site boundary, which is appropriate given the nature of the development proposed. The ZTVs were generated using Lidar data which takes into account screening from buildings and trees in the landscape. This can underestimate the extent of theoretical visibility, particularly in winter when deciduous vegetation is not in leaf and views are more open.

2.22 The parameters used to inform the ZTVs are set out in Appendix B - Methodology, Section B.1.3. These parameters were informed by high level assumptions, for example that buildings would be a maximum of 10 m in height (12 m for Pedham Place). The Landscape and Visual Impact Appraisal for Pedham Place (TMP, 2024) considers building heights of up to 15 m in commercial areas. Therefore the ZTVs in the Evidence Report may underestimate potential visibility and should be treated as indicative only.

Landscape baseline

2.23 For each site, landscape baseline information was provided. This includes details of the aspects related to the existing physical features and the character, qualities and attributes of the site. These are evaluated through key characteristics, the value attached to the landscape, susceptibility to change, and existing detractors. This is in line with GLVIA3 with respect to determining sensitivity of landscape receptors and is acceptable.

2.24 The Evidence Report draws upon 'The Sevenoaks Landscape Sensitivity Assessment' (LUC, 2017) which provides a character area overview of comparative landscape sensitivity around the key settlements of the district. The Evidence Report provides justification where deviations from identified sensitivity are identified within a site, which is appropriate.

Visual baseline

2.25 For each site, visual amenity was considered. This includes details of the extent of potential visibility and key views, with reference to a ZTV map. The Evidence Report states that 'Key Views' are considered to be views from those locations where the most 'sensitive' people would be likely to experience relatively close-distance views of potential development. The Evidence Report references GLVIA3 which states that visual receptors are most sensitive where their occupation or activity means that their attention is likely to be focussed on the landscape. As such, the Evidence Report identifies 'Residents, local communities and people using the landscape for recreation' as the most sensitive visual receptors, which is appropriate. The visual receptors identified are as expected and include residential receptors, users of public rights of way and the long distance Darent Valley Path.

Designated Landscapes

2.26 All of the sites are within the Kent Downs National Landscape. The baseline characteristics of the National Landscape are described in Section 2.1 in the Evidence Report and the special qualities are listed in Appendix B - Methodology.

2.27 Each site appraisal in Appendix A identifies the contribution of the site to the Kent Downs National Landscape, with reference to its special qualities, including tranquility and dark skies. Each site is noted to be 'valued at the highest level' because of its location in the National Landscape, which is appropriate.

Assessment of effects

2.28 This section provides a review of the assessment of potential landscape and visual effects of development within each of the sites. The assessment is set out in detail in Appendix A of the Evidence Report and summarised in Table 3-1 of the Evidence Report (reproduced in **Table 2.2** below).

Table 2.2: Results of Site Assessment

Site name / site code	Sensitivity (Sevenoaks LSA)	Potential significance of effects	Potential significance of effects with additional mitigation
Land between Back Lane and the A21, Bessels Green (HO28)	Medium-high	High	Medium
Brittains Lane, Kippington, Sevenoaks (HO29)	Medium-high	High	Low-medium

Site name / site code	Sensitivity (Sevenoaks LSA)	Potential significance of effects	Potential significance of effects with additional mitigation
Land at Moat Farm, off Homedean Road, Chipstead (MX13)	Medium	Medium	N/A
Land south of Farley Lane, Westerham (HO30)	Medium	Medium-high	Low-medium
Land east of Croydon Road (southern parcel), Westerham (HO31)	Medium	Medium	N/A
Land east of Croydon Road (northern parcel), Westerham (HO32)	Medium	Medium	N/A
Land at Wolfe Westerham, 190 London Road, Westerham (MX14)	Medium	Low-medium	N/A
Land at Mill Farm, West Kingsdown (HO33)	Low-medium and medium	Medium	N/A
Land at Millfield Road, West Kingsdown (HO34)	Medium-high	Low-medium	N/A
Pedham Place, London Road, Swanley (MX15)	Low-medium	High	Low-medium

2.29 The assessment in Appendix A is clearly set out and accords with the steps outlined in the methodology in Appendix B. The assessment is accompanied by clear maps and ZTVs. Overall, the site assessments are consistent and objective.

2.30 As noted in paragraph 2.15, a single judgement is made with regard to the level of effect and its significance. This does not differentiate between landscape and visual effects, as recommended by GLVIA3.

2.31 The assessment identifies effects on the special qualities of the Kent Downs National Landscape (scenic quality, biodiversity, trees and woodland, farmland character, heritage value, soils and resources, naturalistic qualities and sense of relative tranquillity), which is as expected given the likely direct and indirect effects on the National Landscape.

Proposed Mitigation and Residual Effects

2.32 The mitigation identified is appropriate and considers measures to further the statutory purposes of the National Landscape. Reference is made to the Levelling Up and Regeneration Act in Section 2.1.2 of the Evidence Report, and the duty on developers to seek to further the purposes of National Landscapes, which is appropriate.

2.33 The significance of effect is identified with and without mitigation; for four of the areas effects are expected to reduce when mitigation is taken into account (HO28, HO29, HO30, MX15).

2.34 At Pedham Place, the suggested mitigation is to set proposed development back from the Darent Valley, and plant woodland on the steep south and east facing ridges above the valley. Effects are anticipated to reduce from high (substantial significant effects) to low-medium (between no and some significant effects).

2.35 Although the findings are set out clearly, and reasoning provided for a reduction in effects, it is considered that residual effects which take into account mitigation are underestimated. This is because there would be a change to the physical pattern and character of the landscape at the site level. The edges of the site slope steeply to the south and east towards the Darent Valley and as noted in the site appraisal "*Some parts of the site towards the south and east are open and exposed, with long-distance views and it is likely that any development in these locations would be widely visible*". Effects on landscape and visual receptors would therefore likely be significant in the long term.

Cumulative Effects

2.36 The Evidence Report sets out that on a site-by-site basis, effects would be relatively contained, however cumulatively they would have effects with respect to the statutory purpose to protect and enhance natural beauty of the landscape which would be over and above the effects resulting from each development individually. The cumulative assessment is informed by cumulative ZTVs, which illustrate areas of potential intervisibility between development areas, however these figures are not currently within the submitted documents and should be made available for completeness.

Cumulative Assessment for Option 1 sites

2.37 Paragraph 3.1 of the Evidence Report sets out that cumulative effects may result from the combination or interaction of all, or some of, the potential Option 1 developments together, including potential for cumulative effects on landscape character, the special qualities of the Kent Downs National Landscape, or on views and visual amenity. The report notes that cumulative effects may include:

- Cumulative effects of construction including construction vehicles, hoardings and construction activities on the character and visual amenity within the wider landscape, on roads, including rural lanes, and on the special qualities of the National Landscape;
- Effects related to site access which would often necessitate removal of existing vegetation including trees or hedgerows; an effect which would be multiplied over multiple sites;
- Effects on landscape character related to multiple developments affecting the same or multiple character areas;
- Effects on the special qualities and purpose of the Kent Downs National Landscape and its setting; and
- Effects on views and visual amenity of people seeing more than one development from a particular location or in sequential views.

2.38 Cognisant of the fact that the Option 1 sites are considered within cumulative assessment, it is noted that a cumulative assessment of Option 3 (a combined approach of options 1 and 2) has not been provided. This is a potential development scenario and should be considered.

Options Assessment

2.39 Section 4 of the Evidence Report sets out a comparison of Option 1, Option 2, and Option 3 based on the individual site assessments and the cumulative assessment of Option 1 sites.

Option 1

2.40 The Evidence Report confirms that Option 1 comprises smaller sites located on the edges of settlements, where effects would be more contained but also more spread out across the National Landscape, with effects extending beyond site boundaries and varying according to topography, exposure, existing vegetation, and proximity and integration with existing settlements.

2.41 The Evidence Report notes that development of all of the sites has the potential for significant effects on the setting of, or gateway into, settlements; landscape character; rural and naturalistic qualities; relative tranquillity; rural lanes; heritage assets; views and visual amenity; longer distance views; and the special qualities of the Kent Downs National Landscape.

2.42 It is noted that there are opportunities for mitigation within all sites, including tree planting, avoiding particularly sensitive features, and reducing the site area to avoid development in the most sensitive areas, although reductions in site area would reduce the numbers of houses able to be accommodated which may affect viability.

2.43 The conclusions of the Option 1 assessment are clearly set out and objective.

Option 2

2.44 The Evidence Report notes that Option 2 concentrates landscape and visual effects within a single area at Pedham Place, where existing access and the site's separation from Swanley by the M25 reduce the potential for wider landscape and settlement impacts. The Evidence Report identifies that there would be changes to the rural characteristics of the site and potentially the wider landscape, loss of recreational value of the golf course, changes to long views across the Darent Valley, and effects on the setting and sense of separation between Swanley and Farningham.

2.45 The Evidence Report concludes that "*Option 2 (the Pedham Place site) would be more able to accommodate development of the type proposed due to its land use, character, context and larger size*". It also concludes that "*This site offers more opportunity for incorporating more extensive mitigation, and there are also more opportunities to provide benefits to landscape and visual amenity, and more potential to provide enhancements that may further the purposes of the National Landscape, both on and off-site, as well as compensatory mitigation and benefits for local communities*."

2.46 It is unclear how this judgement was arrived at, and considered that further justification is needed for this to be considered a robust argument. Although the other sites are smaller than Pedham Place, many would also offer opportunities for mitigation and enhancement within the National Landscape. Furthermore, mitigation could be considered to be more effective/successful for smaller pockets

of development, i.e. smaller sites. Off-site opportunities for enhancement would be available regardless of scale. These potential opportunities would need to be considered further.

Option 3

2.47 The Evidence Report states that Option 3 would result in the most significant effects, being a combination of Options 1 and 2, noting that there could be opportunity to incorporate some of the Option 1 sites (HO29 with additional mitigation; HO30 with additional mitigation; MX14; and HO34) with the least significant effects, in combination with a reduced development scenario for Option 2. This conclusion seems reasonable.

Conclusion

2.48 The Evidence Report concludes that "*Development undertaken in line with the design parameters for all sites would result in a complete and substantial change in the physical pattern and character at the site level, given they are all currently either entirely or predominantly undeveloped greenfield sites*" (page 12). This is expected given the nature of the proposed development and existing rural character of the sites.

2.49 The Evidence Report concludes that "*It is therefore likely that without mitigation there would be significant effects on landscape and views for both Options 1 and 2 and therefore also Option 3, affecting the statutory purpose of the National Landscape to conserve and enhance natural beauty*" (page 12). This is expected, given that the sites are all located within the National Landscape.

2.50 The Evidence Report notes that there is potential for mitigation within all of the sites in both Options 1 and 2 that could lower the significance of effects. For example, at Pedham Place the effects would drop from high (substantial significant effects) to low-medium (between no and some significant effects). Although reasoning was provided for this reduction in effects, it is considered that the residual effect are underplayed. This is because of the "*complete and substantial change in the physical pattern and character at the site level*" noted in the Evidence Report, which would have long term effects on landscape character, visual amenity and the special qualities of the Kent Downs National Landscape. The Evidence Report also does not account for the time it would take for new woodland planting to mature and effectively integrate new development.

2.51 The Evidence Report concludes that "*Option 2 would be likely to cause the least harm to the Kent Downs National Landscape compared to the other two options*" (page 12). The reasoning provided for this is that the larger size of the site would provide more opportunities for mitigation and enhancement. It is unclear how this judgement was made, and further justification is needed. For example, it is possible that a smaller scale development at the edge of an existing settlement could be more readily integrated into its setting than a larger site, and many of the sites offer opportunities for mitigation and enhancement within the National Landscape.

Chapter 3
Conclusion and recommendations

3.1 The Landscape and Visual Evidence Report broadly follows the general principles set out in GLVIA3 with some exceptions as set out below. The methodology for the site assessments is clearly set out and carried through to the assessment. The special qualities of the Kent Downs National Landscape are considered, and appropriate opportunities for mitigation and enhancement are identified.

3.2 This section summarises the clarifications and further information required arising as a result of the technical review.

Further information required

1. Further justification in relation to the judgement that Pedham Place will result in the least harm to the Kent Downs National Landscape, in terms of landscape and visual effects (due to its land use, character, context and larger size), when compared with the other options.
2. Further justification that the Pedham Place option provides more opportunities to enhance the special qualities of the Kent Downs National Landscape, both on and off-site (due to its larger size), when compared with the other options.
3. Further justification regarding the judgement that potential mitigation at Pedham Place would reduce effects from High (i.e. 'substantial' significant effects) to Low-Medium (between some and no significant effects), given that there would be direct effects on landscape character and effects on the special qualities of the National Landscape.
4. It is noted that the ZTVs which accompany the site assessments may not illustrate a reasonable worst-case scenario, given that they take buildings and vegetation into account (which does not account for more open, winter views through deciduous vegetation) and given that buildings could be taller than the 10 m (12 m for Pedham Place) maximum parameter.
5. It is noted that there is no appraisal of cumulative effects on the Kent Downs National Landscape for Option 3.