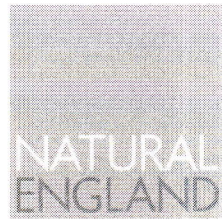


Date: 5 October 2010
Our ref: SEG.13.02.010
Your ref: TM/08/03739/FL



Neil Hewett
Tonbridge and Malling Borough
Council
Development Control
Gibson Building, Gibson Drive
Kings Hill
West Malling
Kent ME19 4LZ

International House
Dover Place
Ashford
Kent
TN23 1HU

By email only, no hard copy to follow

Dear Mr Hewett

Kent Downs Area of Outstanding Natural Beauty

Proposal: Erection of agricultural polytunnels covered with clear plastic sheeting. To include rotational tunnels and successive tunnels with no more than 165 hectares (30%) of the landholding covered with tunnels in any one calendar year

Location: Barons Place Farm, Seven Mile Lane, Mereworth, Maidstone

Thank you for your letter dated 16 August 2010 consulting Natural England on the above application. We appreciate the extension you have provided to us to submit our comments and are grateful for your assistance in providing us with a copy of the landscape and visual impact assessment which we were unable to access from your planning pages.

We have considered the application and the potential impacts resulting from the proposals upon the landscape character of the area, particularly in relation to the potential impacts upon the Kent Downs Area of Outstanding Natural Beauty (AONB) which lies within 1.5 kilometres of the application site. Natural England is disappointed that the potential impacts upon the reasons for designation of the Kent Downs AONB do not appear to have been considered despite the scale of the polytunnels proposed. Given the potential impacts and the lack of an assessment, Natural England **objects** to this application pending the submission of the following information:

- A revised landscape and visual impact assessment considering the potential impacts upon the Kent Downs AONB which should include assessments from view points within the AONB; and
- A detailed plan showing the theoretical zone of visual influence resulting from this proposal.

Natural England's detailed comments in relation to this proposal are provided in Annex One appended to this letter.

We would be happy to comment further should the need arise but if in the meantime you have any queries, please do not hesitate to contact Sean Hanna at the above address, by telephone on 0300 060 4792 or by email to sean.hanna@naturalengland.org.uk.

Yours sincerely

A handwritten signature in cursive script that reads "Sean Hanna".

On behalf of Lorraine Huggett
Government Team Leader
cc Jenny Bate, Kent Downs AONB Unit

A small, handwritten mark or signature in the bottom right corner of the page, possibly initials.

Annex one: Natural England's detailed comments in relation to planning application reference number TM/08/03739/FL

We can confirm that the application site lies approximately 1.5 kilometres to the east of the Kent Downs Area of Outstanding Natural Beauty (AONB) at its nearest point. We welcome the submission of the landscape and visual impact assessment but are disappointed that there is insufficient consideration of the potential impacts upon the Kent Downs AONB.

Given the location, landform, scale of the proposals and the lack of inclusion of any viewpoints from within the AONB Natural England considers that the landscape and visual impact assessment to be incomplete. Consequently **Natural England objects** to this proposal due to lack of information submitted in support of the application. We recommend that the following information is provided by the applicant before determination of this proposal:

- A revised landscape and visual impact assessment considering the potential impacts upon the Kent Downs AONB. This should include assessments from view points, including photo montages, within the AONB at key points such as public footpaths; and
- A detailed plan showing the theoretical zone of visual influence resulting from this proposal.

We request that you also refer to the Kent Downs AONB Management Plan for detailed guidance on ways in which landscape character and local distinctiveness can be preserved when considering this application. Additionally, we suggest that you also send details of the proposal to the AONB Unit, if you have not done so already in order to ensure that planning issues regarding this proposal take into account the various issues that arise as a result of the AONB designation. The AONB management plan can be viewed on the Kent Downs AONB website www.kentdowns.org.uk. The Kent Downs AONB Unit can be contacted at West Barn, Penstock Hall, East Brabourne, Ashford, Kent TN25 5LL, by telephone on 01303 815170 or by email to mail@kentdowns.org.uk.

Natural England is also concerned that the wider landscape impacts of this proposal appear not to have been fully assessed since all of the viewpoints with the exception of viewpoint 5 are within the application site itself. Given the scale and nature of the development, there is the potential for significant impacts upon the wider local landscape and for users of well established regional recreational routes such as the Greensand Way and the Weald Way. For a scheme of this nature and size, Natural England would normally expect to see a wide selection of viewpoints, both within the application site and the surrounding countryside to be used during the landscape and visual impact assessment to provide a robust assessment of the landscape impacts.