

Claire Shearing
Case Officer
Sevenoaks District Council

Sent by email to:
Planning.comments@sevenoaks.gov.uk

22 July 2020



Kent Downs AONB Unit
West Barn
Penstock Hall Farm
Canterbury Road
East Brabourne
Ashford, Kent TN25 5LL
Tel: 01303 815170
Fax: 01303 815179
mail@kentdowns.org.uk
www.kentdowns.org.uk

Dear Claire

Application: 19/05000/HYB: DSTL Fort Halstead, Crow Drive, Halstead TN14 7BU

Hybrid application comprising development of business space of up to 27,773 sq. m GEA, development of up to 635 residential dwellings, development of a mixed-use village centre; land safeguarded for a primary school; change of use of Fort area to Historic Interpretation Centre etc.

AMENDED PLANS

Thank you for consulting the AONB Unit on the amended plans in respect of the above application. The following comments are from the Kent Downs AONB Unit and as such are at an officer level and do not necessarily represent the comments of the whole AONB partnership. The legal context of our response and list of AONB guidance is set out as Appendix 1 below.

While recognising that the revised proposals reduce the proposed number of dwellings and accordingly the overall density, the AONB Unit remains of the view that the amendments do not wholly address the AONB Unit's concerns set out in our consultation response to the application dated 13 November 2019, attached as Appendix 2 to this letter.

In particular:

- The proposed uplift in employment space amounts to just 114 sqm. As such, and with a proposed inclusion of 635 residential units, the scheme remains primarily residential in nature, in direct conflict with the policy requirement set out in EMP3 for development to be employment-led.
- While we note that the densities have been reduced from the originally submitted plans, they remain in excess of the previous approval as well as what is characteristic and appropriate for a new settlement in the Kent Downs, as result of the uplift in overall residential units proposed for the

Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and
West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of Scilly
Kent Downs
Lincolnshire Wolds
Llyn
Malvern Hills
Mendip Hills
Nidderdale
Norfolk Coast
North Devon
North Pennines
North Wessex Downs
Northumberland Coast
Quantock Hills
Shropshire Hills
Solway Coast
South Devon
Suffolk Coast and Heaths
Surrey Hills
Tamar Valley



Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

site. We do however welcome the revised variation in densities proposed for the Village Mews Character Area.

- The proposed apartment buildings remain unchanged comprising large-scale blocks of a scale and mass. We remain of the view that these have no relation to village settlements in the Kent Downs AONB, adopting an urban scale and design more appropriate to a city location, and that the scale and design of these buildings is wholly inappropriate for this location.
- The materials palette is also unchanged, and we remain of the view that widespread use of white and buff brick, and grey tiles as is promoted in the Design Principles would fail to achieve the local distinctiveness of the Kent Downs. We are surprised to see the AONB Statement submitted with the application justify the acceptability of the materials by stating '*At this stage, details of material are indicative only with the exception of Q13 and Q14 in the Village Centre. As with the original permitted planning application, reserved matters applications will be prepared to provide detail on the scale, layout and appearance of the development and the AONB Unit will be consulted on as part of this process.*' Such a statement brings into question the purpose and validity of the submitted Design Principles. Such a statement also reinforces our previously raised concerns regarding the fact the application is premature, being submitted ahead of a Development Brief as required under Local Plan policy EM3, as it intimates little reliance and certainty can be placed on the Design Principles and Character Area Guidance contained within this on future proposals coming forward.
- Our concerns regarding the extent of tree removal and the impact of local character remains, as despite the reduction in unit numbers and density, the proposals still permit for the loss of up to 30 percent of the existing tree cover on the site, with 15 per cent confirmed to be removed and an uncertain future for the remaining 15 per cent.

Taking the above into account, we remain of the view that the proposal is not limited in scale or extent and fails to meet or assure the standards which should be expected within the Kent Downs AONB and fails to meet both local and national policy relating to nationally protected landscapes as well as failing to comply with all aspects of the Kent Downs AONB Management Plan, as set out in detail in our letter dated 13 November 2019. **The Kent Downs AONB Unit therefore maintains its objection to the application.**

Yours sincerely



Katie Miller
Planning Manager, Kent Downs AONB Unit

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

APPENDIX 1

Planning consultations with the Kent Downs AONB Unit

Background and context:

The Kent Downs Area of Outstanding Natural Beauty partnership (which includes all the local authorities within the AONB) has agreed to have a limited land use planning role. In summary this is to:

- Provide design guidance in partnership with the Local Authorities represented in the AONB.
- Comment on forward/strategic planning issues-for instance Local Development Frameworks.
- Be involved in development management (planning applications) in exceptional circumstances only, for example in terms of scale and precedence.
- Provide informal planning advice/comments on development control (planning applications) at the request of a Kent Downs AONB Joint Advisory member and /or Local Authority Planning Officer.

The Countryside and Rights of Way Act 2000

The primary legislation relating to AONBs is set out in the Countryside and Rights of Way Act 2000. Section 85 of this Act requires that in exercising any functions in relation to land in an AONB, or so as to affect land in an AONB, relevant authorities, which includes local authorities, shall have regard to the purpose of conserving and enhancing the natural beauty of the AONB. This is known as the 'Duty of Regard'. The Duty of Regard can be demonstrated by testing proposals against the policies set out in the Kent Downs AONB Management Plan and its supporting guidance (see below).

Relationship of the AONB Management Plan and Development Management

The CRoW Act requires that a management plan is produced for each AONB, and accordingly the first Kent Downs AONB Management Plan was published in April 2004. The second revision Management Plan (2004-2019) has been formally adopted by all the local authorities of the Kent Downs. The Management Plan may be viewed on the Kent Downs web site. Please let us know if you would like any hard copies.

<https://s3-eu-west-1.amazonaws.com/explore-kent-bucket/uploads/sites/7/2018/04/18113849/KDAONB-Management-Plan.pdf>

Under the CRoW Act, the Management Plan is required to 'formulate the (Local Authority) policies for the management of the AONB and for carrying out their

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

functions in relation to it'. The policies of the Kent Downs AONB Management Plan are therefore the adopted policies of all the Local Authorities in the Kent Downs.

The national Planning Policy Guidance confirms that AONB Management Plans can be a material consideration in planning decisions and this view is confirmed in previous appeal decisions, including APP/U2235/W/15/3131945, Land west of Ham Lane, Lenham, Maidstone, where at para 48 of the Inspectorate's decision letter, it is confirmed that "the Kent Downs AONB Management Plan April 2014 (the Management Plan) is also a further significant material consideration". The decision can be downloaded at:

<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3131945>

Any Kent Downs AONB Unit response to consultations on planning applications will reflect the policies of the Management Plan along with other Kent Downs AONB produced guidance which help support the delivery of the policies of the Management Plan, as set out below.

Other Kent Downs AONB Guidance

[Kent Downs Landscape Design Handbook](#)

Design guidance based on the 13 landscape character areas in the Kent Downs. Guidance is provided on fencing, hedges, planting, gateways etc. to help the conservation and enhancement of the AONB.

[Kent Downs Renewable Energy Position Statement](#)

Provides a clearly articulated position for the Kent Downs AONB partnership with regards to renewable energy technologies. It recognises that each Local Planning Authority must balance the impact of proposals for renewables on the AONB with all the other material planning considerations.

[Kent Rural Advice Service Farm Diversification Toolkit](#)

Guidance on taking an integrated whole farm approach to farm developments leading to sound diversification projects that benefit the Kent Downs.

[Kent Downs Land Manager's Pack](#)

Detailed guidance on practical land management from how to plant a hedge to creating ponds and enhancing chalk grassland.

[Rural Streets and Lanes - A Design Handbook](#)

Guidance on the management and design of rural lanes and streets that takes the unique character of the Kent Downs into account. This document discusses the principle of shared space and uses examples from around the UK and Europe. The Handbook has been adopted by Kent County Council as policy.

[Managing Land for Horses](#)

A guide to good practice on equine development in the Kent Downs, including

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

grassland management, fencing, trees and hedges, waste management and basic planning information.

[Kent Farmstead Guidance and Kent Downs Farmstead Guidance](#)

Guidance on the conservation, enhancement and development change of heritage farmsteads in the Kent Downs based on English Heritage's Kent and National Character Area Farmstead Statements. Includes an Assessment method and Design Guidance.

[Kent Downs Setting Position Statement](#)

An advisory document providing guidance on issues of setting including the legislative basis for considering setting, identification of where setting is likely to be an issue and provision of advice on how to mitigate potential impacts.

The NPPF and AONBs

National planning policies are very clear that the highest priority should be given to the conservation and enhancement of Areas of Outstanding Natural Beauty. The NPPF confirms that AONBs are equivalent to National Parks in terms of their landscape quality, scenic beauty and their planning status.

Paragraph 172 of the revised NPPF specifies that 'great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues.' It is advised that the scale and extent of development within AONBs should be limited and that major developments should be refused in AONBs except in exceptional circumstances and where it can be demonstrated that they are in the public interest. No definition is given as to what constitutes major development within an AONB, however a footnote to this paragraph states that this is 'a matter for the relevant decision taker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined'.

The thrust of the NPPF as set out in paragraph 11 is that there is a presumption in favour of sustainable development. It specifies that in respect of decision taking, proposals that are in accordance with an up to date development plan should be granted, however where there are no relevant development plan policies, or policies are out of date, permission should be granted unless the application of specific policies in the Framework that protect areas of particular importance provide a clear reason for refusing the development. Footnote 6 to this paragraph specifies that such policies include those relating to AONBs. A Court of Appeal case in June 2017¹ clarified that identification of policies indicated in Footnote 6 (previously footnote 9 to paragraph 14 of the 2012 NPPF), does not shut out the presumption in favour, rather the specific policy or policies have to be applied and planning judgment exercised. In

¹ Barwood Strategic Land II LLP (Appellant) and (1) East Staffordshire Borough Council and (2) Secretary of State for Communities and Local Government (Respondents), on appeal from the Administrative Court Planning Court, [2017] EWCA Civ 893 Case No: C1/2016/4569 [2016] EWHC 2973 (Admin), before: Lord Justice Gross, Lord Justice Underhill and Lord Justice Lindblom, on 25th May 2017.

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

the case of AONBs, this would mean an assessment of the acceptability of the proposal against paragraph 172 of the NPPF.

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

APPENDIX 2

Claire Shearing
Case Officer
Sevenoaks District Council

Sent by email to:
Planning.comments@sevenoaks.gov.uk



13 November 2019

Dear Claire

Application: 19/05000/HYB: DSTL Fort Halstead, Crow Drive, Halstead TN14 7BU

Hybrid application comprising development of business space of up to 27,659 sq. m GEA, development of up to 750 residential dwellings, development of a mixed-use village centre; primary school; change of use of Fort area to Historic Interpretation Centre etc.

Thank you for consulting the AONB Unit on the above application. The following comments are from the Kent Downs AONB Unit and as such are at an officer level and do not necessarily represent the comments of the whole AONB partnership. The legal context of our response and list of AONB guidance is set out as Appendix 1 below.

Introduction

The application site is located in the Kent Downs AONB. The application should therefore be tested against the purpose of the AONB designation, to conserve and enhance the natural beauty of the Kent Downs AONB and the way that this purpose is represented in local and national policy.

The AONB Unit has previously accepted the principle of redevelopment of Fort Halstead. The redevelopment of the site represents a unique opportunity to create a truly exemplary sustainable development in an internationally protected landscape. The starting point for the proposal should be the purpose of the Kent Downs AONB and proposals for the redevelopment should accordingly be landscape led. We are concerned that it is the quantum of residential units now being proposed which has been a more significant driving force in shaping the proposals now submitted.

Despite a significant amount of information having been provided, most of this is intent and is not tied down and the key 'fixes', the parameter plans

Anglesey
Arnside and Silverdale
Blackdown Hills
Cannock Chase
Chichester Harbour
Chilterns
Clwydian Range
Cornwall
Cotswolds
Gower
Cranbourne Chase and
West Wiltshire Downs
Dedham Vale
Dorset
East Devon
Forest of Bowland
Howardian Hills
High Weald
Isle of Wight
Isles of Scilly
Kent Downs
Lincolnshire Wolds
Llyn
Malvern Hills
Mendip Hills
Nidderdale
Norfolk Coast
North Devon
North Pennines
North Wessex Downs
Northumberland Coast
Quantock Hills
Shropshire Hills
Solway Coast
South Devon
Suffolk Coast and Heaths
Surrey Hills
Tamar Valley

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

and Design Principles would, in our view, result in a development which does little to respond to the landscape setting and character of the Kent Downs and appears somewhat generic.

Policy background

The primary legislation relating to AONBs is set out in the Countryside and Rights of Way Act 2000 (CROW Act). Section 85 of this Act requires that in exercising any functions in relation to land in an AONB, relevant authorities (which includes local authorities) shall have regard to the purpose of conserving and enhancing the natural beauty of the AONB.

Despite the Government's focus on increasing housebuilding in the revised NPPF, policy on AONBs has not been weakened in anyway, indeed it has been strengthened, with a newly twice repeated instruction in paragraph 172 for AONBs to be enhanced, as well as conserved, bringing the policy in line with the primary legislation relating to AONB, the Countryside and Rights of Way Act 2000. In addition, a further newly inserted requirement of particular relevance to consideration of this revised application is a requirement for development within AONBs and National Parks to be '*limited in scale and extent*'.

The controls on major development within AONBs remains unaltered within the NPPF, that major proposals within AONBs are only acceptable where they are both in the public interest and in exceptional circumstances. A new footnote however provides a helpful new steer on what decision makers should take into account when testing whether a proposal constitutes major development.

The national Planning Practice Guidance has also recently been updated in respect of guidance on AONBs (July 2019). The Guidance specifies that "*All development in National Parks, the Broads and Areas of Outstanding Natural Beauty will need to be located and designed in a way that reflects their status of landscapes of the highest quality*" (Paragraph 041 Reference ID:8-041-20190721). This paragraph also reiterates the requirement set out at paragraph 172 in the NPPF that the scale and extent of development with National Parks and AONBs should be limited, in view of the importance of conserving and enhancing their landscape and scenic beauty.

Local Plan policy

The application site is allocated as a Major Employment Site in the Sevenoaks Allocations and Development Management Plan, adopted February 2015 – Policy EMP3. This policy sets out the principles for redevelopment and provides details of the form and quantum of development that would be acceptable. The policy is clear that the main allocation for the site is for employment uses, while recognising that the redevelopment may also include a hotel and residential development of up to 450 units providing that this forms "*part of a mixed used scheme that delivers an employment-led development*".

The proposal incorporates 750 residential units. This is an uplift of 300 units from the quantum set out in policy EM3 and the previously permitted scheme and while the redevelopment proposals incorporate an element of employment, the scheme is clearly now primarily residential in nature, in direct conflict with the policy requirement for development to be employment-led. In the submission for the

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

approved scheme it was advised that 450 units was found to be the 'appropriate quantum of residential units for the site to be sustainable and viable'. In contrast, the uplift of 300 units submitted under the current scheme is in response to a request from the local authority that the site accommodate a greater development capacity. This significant increase in numbers is accommodated through a combination of larger, bulkier buildings in the village centre, a reduced village green, a reduction of 4.5ha of green spaces, inclusion of two previously proposed undeveloped areas at either end of the site and an increase in density and heights, all of which have the potential to negatively impact on the special character and qualities of the Kent Downs AONB.

Policy EMP3 sets out detailed policy requirements that any development proposals will be expected to meet. The AONB Unit considers that the application does not meet several of these requirements, in particular:

The height of the buildings must take into account the need to conserve and enhance the natural beauty of the countryside.

The proposed building heights, as set out in the height parameter plan and design principles, are considered to challenge this part of the policy. Building heights should be derived through consideration of what heights are appropriate to the site, informed by landscape character (including settlement character). The heights of the buildings appear to have been set in part to meet the aim of ensuring that the development cannot be seen from outside of the site and in part to achieve the increase in unit numbers. The fact the development is hidden by trees or not visible from surrounding villages of the AONB (as justified in the AONB Report) is not sufficient; the impact on landscape itself needs to be considered as the site itself is part of the AONB landscape and therefore the design and height of the development must take account of the need to conserve and enhance the character and qualities of the landscape. While the overall maximum height is not exceeded in the revised proposal, the proposal significantly increases the general heights of buildings. Previously, the majority of housing was proposed at two stories, with limited residential proposed at 2.5 stories, only along the main vehicular routes. Now, the scheme proposes all the housing on the previously approved parcels at 3 and 2.5 stories. Such heights are wholly out of character for a rural settlement in the Kent Downs where the vast majority of existing residential development is 2 stories only and would fail to conserve and enhance the natural beauty of the countryside.

Make a positive contribution to the achievement of aims and objectives of the Kent Downs AONB Management Plan and conserve and enhance the natural beauty and tranquility of the Kent Downs AONB Management Plan and conserve and enhance the natural beauty and tranquility of the Kent Downs Area of Outstanding Natural Beauty;

This appropriately sets a very high bar for the development, especially in the context of national and other local policy. We think that the proposals fall short of meeting the expectations set out in this part of the policy.

The Planning and Design and Access Statement advise that the development delivers a range of environmental improvements and benefits the natural beauty criteria of the AONB. Reference is made to enhancement of natural heritage features and ensuring the sensitive management of the woodland, mature trees and areas of chalk, semi-

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

improved and neutral grassland and it is claimed that the development will also benefit the understanding and enjoyment of the AONB, and the social and economic wellbeing of communities within the AONB. The AONB Unit broadly agrees with the importance placed in the design principles and landscape strategy to retaining and managing the natural landscape features of the site such as mature trees, chalk grassland and woodland. Doing so however does not add up to conserving and enhancing the AONB or making a net contribution to the purposes of the AONB Management Plan.

Provide for a comprehensive development and include a phasing plan.

The Design and Access Statement recognises that due to the scale of the site and proposals, future development would need to be undertaken in phases. While a phasing plan is produced, the D & A advises that this is indicative only. As such, no certainty can be attached to the content and delivery of the phases as set out.

Delivery mechanism.

The Allocations and Development Management Plan advises that the delivery mechanism for policy EMP3 will be a Planning Brief, to provide a more specific agreed planning framework than the policy and that it will be prepared in consultation with a number of bodies/organisations, including the Kent Downs AONB Unit. No such document has been prepared. It is contended that in the absence of such a Brief the proposal is premature and developer led rather than conforming to a guiding framework that has been properly considered and subject to appropriate consultation. Much of the content of the application is indicative only, therefore falling short of the certainty of what would be afforded within a Planning Brief. The only fixed information – the parameter plans and Design Principles including Character Area Guidance – are not considered to adequately respond to landscape setting, nor result in a development that would conserve and enhance the AONB and meet the requirements of EMP3 and paragraph 172 of the NPPF.

Further relevant policies from the **Sevenoaks Allocations and Development Plan Development Plan (2015)** include:

Policy SC 1 – Presumption in Favour of Sustainable Development. This requires proposals to have regard to several matters including a) the compatibility and suitability of the proposal to its location; and b) the impact of the proposal on the surrounding environment, landscape, habitats and biodiversity, including the Area of Outstanding Natural Beauty. The failure of the scheme to adequately respond to the landscape setting and local character, qualities and distinctiveness of the Kent Downs AONB results in the proposal not complying with this policy.

Policy EN1 – Design principles. This policy requires proposals to create a high quality design that, amongst other things, respects the character of the site and surrounding area. The failure of the scheme to adequately respond to the landscape setting and locally distinctive character of rural settlements and buildings of the Kent Downs AONB results in the proposal not complying with this policy.

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

Policy EN5 – Landscape. This policy advises that proposals within the AONB will be permitted where the character of the landscape would be conserved and enhanced and regard is had to the AONB Management Plan and associated guidance. The proposals as submitted are not considered to meet the stringent requirements set out for reasons elaborated on below.

Policy EN6 – Outdoor lighting. This prescribes that lighting proposals within the AONB need to demonstrate that lighting is essential for safety or security reasons and requires that the impact of lighting on the night sky be minimised. The applicant justifies proposed lighting of the scheme on the basis that the site is currently lit and proposes use of unnecessary tree uplighters. This does not comply with the requirements of either policy EN6 or Management Plan policy SD6 on dark skies at night that seeks to reduce the amount of outdoor lighting.

Sevenoaks Core Strategy 2011

Policy advice relating to AONBs is also provided in Core Strategy policy LO8 'The Countryside and the Rural Economy'. This requires that the distinctive character of the AONB be conserved and enhanced and that all development should conserve and enhance local landscape character. The failure of the scheme to adequately respond to the landscape setting and local character, qualities and distinctiveness of the Kent Downs AONB results in the proposal not complying with this policy.

Sevenoaks Local Plan Deposit Draft Regulation 19 Local Plan

The Kent Downs AONB Unit is aware that the site is proposed as an allocation in this draft local plan for 750 dwellings (policy ST2-57).

The NPPF at paragraphs 48 and 49 advises that weight may be given to policies in emerging local plans according to the stage of the Plan, the extent to which there are unresolved objections and the degree of consistency of the policy with the NPPF. Paragraph 49 advises that prematurity of an application is unlikely to justify refusal except where the development is so substantial it would undermine the plan making process by predetermining decisions about the scale, location and new development that are central to an emerging plan which is not yet formally part of the development plan.

The AONB Unit submitted a strong objection to this proposal, considering the proposed increase in housing numbers to be contrary to national planning policy. The Local Plan has been put on hold with the Inspector cancelling the second round of Local Plan hearings due to concerns regarding the Council's compliance with the Duty to Co-operate and the Inspector also having '*significant concerns about the soundness of the Plan in respect of a number of areas including the approach to Sustainability Appraisal, the chosen Strategy for Growth, the assessment of the Green Belt and housing supply and distribution*'. In view of the scale of the proposal and the significant harm to the AONB that would arise, the fact that earlier proposals for the redevelopment of the site with 750 dwellings did not receive support from the Inspector at the Sevenoaks Core Strategy Examination in 2010, we consider it entirely inappropriate for an application of this scale, that is in conflict with national planning policy paragraph 172 to be determined outside of the Local Plan process and

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

determination of the application should be deferred until this matter has been resolved.

The Kent Downs AONB Management Plan

The Countryside and Rights of Way Act 2000 sets out a requirement for a Management Plan to be prepared and published for AONBs. [The Kent Downs AONB Management Plan 2014 - 2019](#) sets out the aims, policies and actions for the conservation, enhancement and management of the AONB. The Management Plan is prepared by the AONB Unit and the Joint Advisory Committee for and on behalf of the twelve local authorities within the Kent Downs and has been adopted by all local planning authorities in the Kent Downs, including Sevenoaks District Council.

Ensuring development proposals conform with policies of the Management Plan helps demonstrate compliance with the Duty of Regard set out at paragraph 85 of the Countryside and Rights of Way Act. The national Planning Practice Guidance confirms that AONB Management Plans can be a material consideration in planning decisions and this view is confirmed in previous appeal decisions, including APP/U2235/W/15/3131945, Land west of Ham Lane, Lenham, Maidstone, where at para 48 of the Inspectorate's decision letter, it is confirmed that "the Kent Downs AONB Management Plan April 2014 (the Management Plan) is also a further significant material consideration". The decision can be downloaded at:

<https://acp.planninginspectorate.gov.uk/ViewCase.aspx?caseid=3131945>

While the retention and management of natural landscape features as set out in the Landscape Strategy and Design principles conforms with aims and objectives of the Management Plan, many aspects of the proposal do not. As such we do not consider the proposal as a whole makes a net positive contribution to the Management Plan, as required by policy EM3. In particular, we are of the view that the proposal fails to meet the objectives of the following policies of the Management Plan:

MMP2 Individual local authorities will give high priority to the AONB management plan vision, policies and actions in local Plans, development management decisions, planning enforcement cases and in carrying out other relevant functions.

SD1 The need to conserve and enhance the natural beauty of the Kent Downs AONB is recognised as the primary purpose of the designation and given the highest level of protection within the statutory and other appropriate planning and development strategies and development control decisions.

SD2 The local character, qualities and distinctiveness of the Kent Downs AONB will be conserved and enhanced in the design, scale, setting and materials of new development, redevelopment and infrastructure and will be pursued through the application of appropriate design guidance and position statements which are adopted as components of the AONB management Plan.

SD3 New development or changes to land use will be opposed where they disregard or run counter to the primary purpose of the Kent Downs AONB.

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

SD7 To retain and improve tranquillity, including the experience of dark skies at night, careful design and the use of new technologies should be used. New developments and highways infrastructure which negatively impact on the local tranquillity of the Kent Downs AONB will be opposed unless they can be satisfactorily mitigated.

SD8 Proposals which negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the AONB will be opposed unless they can be satisfactorily mitigated.

SD9 The particular historic and locally distinctive character of rural settlement and buildings of the Kent Downs AONB will be maintained and strengthened. The use of locally derived materials for restoration and conservation work will be encouraged. New developments will be expected to apply appropriate design guidance and to be complementary to local character in form, setting, scale, contribution to settlement pattern and choice of materials. This will apply to all development, including road design (pursued through the adoption and implementation of the AONB Rural Streets and Lanes Design handbook), affordable housing, development on farm holdings (pursued through the farmstead design guidance), and rights of way signage.

LLC1 The protection, conservation and enhancement of special characteristics and qualities, natural beauty and landscape character of the Kent Downs AONB will be supported and pursued.

The application also fails to have regard to other Kent Downs AONB Guidance, including the Kent Downs Landscape Design Handbook and Rural Streets and Lanes – A Design Handbook.

Harm to the Kent Downs AONB

The Kent Downs AONB Unit considers that proposals to increase the density of the previously permitted site at Fort Halstead from 450 to 750 to be wholly inappropriate and the quantum, massing and scale of development is far too high for a settlement in the Kent Downs AONB. While we acknowledge that it is a major developed site in the Green Belt, and in view of the previous use of the site, the AONB Unit has accepted the principle of redevelopment here, we consider that increasing the density would not respond to the special circumstances of the site in terms of its location within the Kent Downs Area of Outstanding Natural Beauty as well as being in conflict with the revised NPPF which specifies that development within AONBs “should be limited in scale and extent” (paragraph 172) and in respect of plan making, the presumption in favour of sustainable development now explains, at paragraph 11, that being in an AONB provides a strong reason for restricting the overall scale, type of distribution of development in the plan area.

The site occupies an environmentally sensitive position with buildings immediately behind the top of the scarp of the North Downs overlooking Sevenoaks. The site’s position within the AONB represents a unique opportunity to create a truly exemplary sustainable development within a nationally protected landscape. The starting point for any re-development must be the conservation and enhancement of the AONB as required under national planning policy at paragraph 172. In order to achieve this, it will be crucial that any re-development is truly landscape led and responds to local

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

character rather than seeking to maximise the amount of new residential units on the site as proposed which fails to achieve this.

The proposed increase in units has been achieved through a combination of increase in footprint of buildings, heights and area of land proposed for development. In doing so, it is advised that "The vision is not to create a traditional AONB village – that mimics existing settlement patterns, building density and architectural details – but reflects its historic military development and instead creates a new community". We consider such a proposal to be wholly contrary to national and local plan policy which require the AONB to be conserved and enhanced. The distinctive settlement character of the villages within the Kent Downs makes an important contribution to the overall character of the AONB with the form, layout and pattern of villages being key elements of settlement character. Development proposals within AONBs need to conserve and enhance this distinctive settlement character and respond to the character of the built environment, as set out in AONB Management Plan policies SD2 and SD9 which specify that new developments should be complementary to local character in form, setting, scale, contribution to settlement pattern and choice of materials.

An increase in the amount of land required for buildings will reduce the amount of land available for landscaping. We have particular concerns that increasing the quantum of development will also lead to increased removal of trees across the site. At present the site retains a wooded setting with Ancient Woodland not only wrapping around the perimeter of the site but heavily featuring in groups and individual trees through the site which is a strong characteristic of the site and reflects its historic woodland character. We note that while about 90 per cent of the most valuable trees are proposed to be retained within the site, only 67% of the total number of trees are confirmed to be retained, with 16 per cent confirmed to be removed and an uncertain future for the remaining 17 per cent.

The Kent County Landscape Character Assessment carried out in 2004 places the site in the Knockholt: Darent Valley LCA. Characteristic features include small scale gently rolling dry valleys, mixed farming and deciduous coppice woodland, suburban planting and paddocks and settlement associated with railway. The area is assessed as being in Very Good condition with a high sensitivity resulting in a Conserve action. Specific identified actions for this LCA include conserving the dense woodland cover with the characteristic detail of the woodland being specifically identified as being very important, such as mature beech, oak plantations and the variety associated with coppice management of some densely wooded areas. The isolation of farming settlements is also identified as being important to conserve, in addition to small, enclosed pastures and narrow roads.

The more recent Sevenoaks LCA carried out in 2017 places the site in the Knockholt and Halstead Wooded Downs LCA which also identifies key characteristics as including large areas of woodland, including ancient coppice woods. The vision is for 'a strongly wooded rural landscape with historic landscape patterns and features including village cores, narrow lanes and ancient woodland. A landscape with well-integrated settlement and newer suburban land uses, which is highly valued for recreation.' Landscape guidance for the area includes protecting the valued heritage features within the landscape including the Fort Halstead Scheduled Monument and new features introduced into the landscape are to reflect both the historic and natural characteristics of the area. It is considered that the increase in development at Fort Halstead would fail to comply with these guidelines.

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

A further concern regarding the increase in quantum of development is that this would significantly increase activity at the site beyond the previous activity and that associated with the recent planning permission. It would result in a transformation of the site into a residential led scheme rather than employment scheme and would in effect create a new village on the North Downs scarp rather than represent a continuation of the previous employment led uses.

As part of a site visit it was observed that Ash is a component of the tree cover on the Fort Halstead site. We note from experience that with the advent of Chalara Fraxinea (Ash Dieback) it is no longer possible to rely on mature Ash for screening (the mature woodland is relied on in the application) and expect it to remain an important component of the woodland, certainly as a mature tree. The Council should consider the impact of Ash Dieback in its deliberations (perhaps require an assessment of the landscape impact of a loss of the ash component of the woodland and at least require an appropriate strategy for the replacement of Ash trees in the future of the site).

While it is noted that the site is already lit, this does not preclude the applicant from supporting the Kent Downs AONB Management Plan policy on Dark Skies i.e. seeking to actively reduce the amount of lighting from what is there now, this would be in line with policy. The commitment to change the glow from orange to white does not sufficiently enhance the situation, wherever possible lighting should not be placed in a rural site like this, where lighting is necessary (rarely) it should have minimum impact – we recommend the use of interactive low intensity 'warm' LED lighting. It is advised that all external lighting will be required to meet ILP Category E2 – Rural District; in the event of permission be granted, this should be made a condition of the permission. Of particular concern is the inclusion of use of tree uplighters in the Lighting Strategy. Such a proposal is considered wholly inappropriate and conflicts with the assertion in the Strategy that obtrusive light and sky glow can be addressed through careful selection of luminaire with good reflectors. The application needs to demonstrate how it is making a positive contribution to the conservation and enhancement of the AONB.

Density

As identified earlier, the distinctive settlement character of the villages within the Kent Downs makes an important contribution to the overall character of the AONB with the form, layout and pattern of villages being key elements of settlement character. This includes responding to historic village layouts, building to plot/green space ratios and being of a density that allows for well-designed landscaping schemes that retain important trees and includes new structural planting that contributes to the character and amenity of the area. Gradual erosion of local distinctiveness, character and visual harmony has occurred in some parts of settlements within the Kent Downs, with little respect for historic settlement pattern. It is important that this is not taken to set the character or provide a reference point for densities for new development; the design of new development including densities must contribute to fully conserving and enhancing settlement character and therefore support the AONBs primary purpose.

The proposed development would result in a density that would have an urban grain and would not reflect the generally lower and more varied densities that are a defining characteristic of Kent Downs villages. As such the higher densities that are now being

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

proposed are considered wholly inappropriate for this highly sensitive site within the nationally protected AONB.

We consider more variation in the densities within the Character Areas should be incorporated to help the character and place-making of the development and avoid the currently proposed generic homogeneity, particularly prevalent in the Village Mews Character Area.

Heights

Probably the largest change to the scheme as a result of the proposed increase in density is the increase in heights of the buildings across the site, as reflected in the proposed height parameter plans. While it is advised in the submission that the maximum proposed heights do not exceed those in the approved scheme, the overall proposed scale of the buildings have significantly increased from the approved scheme. The residential element of the approved scheme comprised predominantly 2 storey accommodation, with 2.5 stories located only along the main vehicular routes. This is now amended to a mix of 3 and 2.5 stories, with 2 storey accommodation only proposed on the newly identified areas of housing.

Existing buildings on the site are predominantly one and two storey, with only the very occasional taller building. The heights now being proposed would result in much taller buildings across the site, significantly increasing the overall mass of building from what currently exists. The proposed heights would wholly fail to be consistent with traditional heights that are found in domestic buildings within Kent Downs AONB villages, which are typically 2 stories in height, sometimes with attic storey accommodation within steeply pitched roofs.

The heights are justified in part on the basis of the proposed buildings not being very visible in the wider landscape. This fails to acknowledge the impact to landscape character of the AONB, regardless of whether or not the development can be seen from wider public viewpoints. Building heights should be derived through consideration of what heights are appropriate to the site, informed by landscape character - the fact that a development is hidden by trees is not sufficient. The Courts have held that the fact a development is not viewable by the general public does not mean that there is no harm to the intrinsic character of the AONB. (Great Trippetts Estate Ltd v Secretary of State for Communities & local Government [2011] EWCA Civ 203 26 Jan 2011).

The AONB Unit believes that the height parameter plan directly challenges policy EMP3 which refers directly to building heights. It is not sufficient to restrict building heights so that the development cannot be seen from outside the site, the site itself is part of the AONB landscape and this policy applies on site as well as beyond it. The heights and design of buildings on site must take account of the need to conserve and enhance the character and qualities of the landscape.

Design

The special characteristics and qualities of the Kent Downs include the quality of the built heritage and settlement patterns. To conserve and enhance the natural and scenic beauty of the Kent Downs the design of new development is essential. The

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

application submission advises that the vision is not to create a traditional AONB village – that mimics existing settlement patterns, building density and architectural details – but reflects its historic military development and instead creates a new community. As a result elements of the proposed character area guidance do little to respond to the landscape setting and character of the AONB and appears somewhat generic and more suited to urban locations. We think that substantial revisions are required and we would expect that a landscape led design that responds to the character and qualities of the AONB should be expected for this key site in Kent Downs AONB.

The scheme remains short of fulfilling the potential of this unique site and its landscape setting and historic assets. We think it is a missed opportunity not to work more with the existing landscape character in creating an inspiring, contemporary village character fit for living and working in the AONB context.

One area of concern is the proposed scale and design of apartment blocks in the Village Centre. They are proposed as large-scale apartment blocks that have no relation to AONB village settlements adopting an urban scale and design more appropriate to a city location. The buildings are specified as 3 and 4 stories in height and would be much bulkier than the Penney and Q blocks proposed to be retained. Apartment blocks are an incongruous feature in most Kent Downs settlements. In order to reflect local distinctives, they need to be designed to remain domestic in scale and massing to reflect the grain of residential development. They should provide an active edge to the street, with multiple independent entrances so that they read as terraces in the street scene.

The repetitious use of identical units or very similar unit types in scale, mass and form of the Village Mews Character Area also fails to reflect the more varied typologies of settlements in the Kent Downs and results in a contrived artificial built form. We consider it essential to reduce and vary the intensity, massing and height of development within this character area and to offer a more diverse range of housing types.

Materials

The Kent Downs has a rich tradition of half-timbered and weatherboard buildings. There is also a legacy of locally distinctive architecture in locally derived building materials such as Ragstone, flint and chalk. Soft red bricks and clay tiles are the most widely used materials in the Kent Downs. These prevailing materials are a product of the underlying geology and their use embeds local distinctiveness in the built fabric of the towns and villages of the Kent Downs. This distinctiveness began to be eroded in the mid-19th century with the advent of the railways enabling the use of imported materials such as slate and buff/yellow brick. This dilution of local distinctiveness is harmful to the character of the Kent Downs and should not be exacerbated by the widespread use of non-local materials in new developments. Use of the right local materials is a key factor in creating a development that is truly 'of the place'.

We are concerned that some of the proposed materials would fail to achieve the local distinctiveness of the Kent Downs. Of particular concern is proposed use of white brick and dark grey tiles. Bricks in the Kent Downs are predominantly rich hues of reds and oranges with occasional use of burnt headers. There is some limited use of buff brick, following the introduction of railways, however white brick is not considered

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

a traditional material. The roofscape of settlement in the Kent Downs is one of its key defining built characteristics and in order to embed a sense of place in the redevelopment it is critical for the new roofscapes to reflect and contribute to this. Clay rooftiles and tile hanging are the prevalent roofing material in the Kent Downs. It will be important that clay rather than concrete substitute is used as this does not weather in the same way nor possesses the natural depth of hue. Artificial grey tiles that have no place in the Kent Downs, however some limited use of slate may be appropriate.

Timber is ubiquitous throughout the Kent Downs and timber weatherboard cladding is highly characteristic either for the upper floors or for the whole building, reflecting the historic abundance of wood in the area. Locally sourced timber weatherboarding, traditionally oak, elm or larch is a good way to use local materials and reference aspects of local design as well as supporting the AONB by encouraging the sustainable management of woodlands; we would welcome a commitment to locally sourced wood.

Highways Design

Elements of the proposed highway design is also wholly inappropriate to the site's rural setting in the AONB. No regard appears to have been paid to the Kent Downs Rural Street and Lanes Handbook which was prepared by Halcrow and has been adopted by KCC Highways, with the proposals incorporating wholly inappropriate urbanising features. This includes the creation of a large new roundabout at Polhill to facilitate access to the site, involving loss of existing trees as well as the creation of highly inappropriate urbanising infrastructure including squareabouts and eyeots with traffic islands within the main body of the site.

Conclusion

For the reasons set out above, it is our view that the proposal fails to meet or assure the standards which should be expected and fails to meet both local and national policy as well as failing to comply with the Kent Downs AONB Management Plan. **The Kent Downs AONB Unit therefore objects to this application.**

I hope you find these comments useful. I would be happy to discuss further if this would be helpful.

Yours sincerely



Katie Miller
Planning Manager, Kent Downs AONB Unit

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.

Enhancing landscapes and life in the Kent Downs

The Kent Downs AONB Joint Advisory Committee (JAC) promotes and co-ordinates the conservation and enhancement of the Kent Downs AONB. Funding is provided by DEFRA, Kent County Council and the local authorities of Ashford, Bromley, Canterbury, Dover, Gravesham, Medway, Maidstone, Sevenoaks, Shepway, Swale and Tonbridge & Malling. Other organisations represented on the JAC include Natural England, the Environment Agency, Country Land and Business Association, National Farmers Union, Kent Association of Parish Councils and Action with Communities in Rural Kent.