

SEVENOAKS DISTRICT COUNCIL
PARISH /TOWN COUNCIL PLANNING APPLICATION CONSULTATION
RESPONSE

Reference :	20/03660/FUL
Site :	Chevening House Chevening Road Chevening KENT TN14 6HG
Proposal :	Chevening Estate Parkland enhancement, including construction of landscaped mounds, new planting, surface water drainage and public access.
<input type="checkbox"/> Support	
<input checked="" type="checkbox"/> Objection	<p><u>Reasons:</u> Chevening Parish Council objects to the proposed development of Chevening Parkland</p> <p>Chevening Parish Council has commissioned reports from ADN Planning Ltd and Liz Lake Associates (their reports are attached below for your consideration within the Planning process)</p> <p>There are major discrepancies between the findings of the Consultants of the Development and those of our Consultants. Before any decision is taken it is imperative that the discrepancies are addressed by the applicant and the responses of Natural England, Historic England and the Conservation Officer are reviewed by them in the light of the comments from our consultants :-</p> <p>ADN Planning Green Belt Impact The four mounds, even with landscaping would register as an artificial feature that would interrupt the natural contours that flow south from the church to Sundridge Road. The physical mass of the mounds would result from the deposit, compaction and moulding of a considerable amount of soil materials. The engineering operation would take up to 5 years, an indication of the scale of the work proposed. As such it is considered that the mounds would appear as man-made features that would not maintain openness.</p> <p>Very Special Circumstances There is nothing in the documents submitted with the application that alternative screening could not be provided which would be less harmful to the landscape with the scheme still being able to deliver the “community benefits” stated. We take the view therefore that these benefits do not amount to very special circumstances that outweigh the substantial visual harm caused by the proposals.</p> <p>Area of Outstanding Natural Beauty (AONB). Within this landscape setting there is nothing comparable to the proposed mounds. Indeed, the questionable position of the applicants in so far as the mounds will prevent views of the motorway from</p>

Chevening House is made somewhat ironic in that they are replacing one visible impact with another and underlines the adverse impact the proposed mounds would have on what is an open and highly visible location. The mounds are likely to further emphasise the linear form of the motorway and exaggerate its visual impact in views from the public rights of way. The mounds would therefore be an incongruous feature at odds with the natural contours of the land.

Comment

The application submission makes a case that the mounds will reduce the physical impact of the motorway on Chevening House or indeed from all Heritage Assets in close proximity to the site. However, less than substantial evidence has been produced in the form of sight lines to demonstrate what existing views there are from principally the House to the motorway and how these views will be screened by the proposed mounds. Even if it is accepted that the mounds do reduce the visual impact of the motorway, it is our view that such screening could be achieved without the need for works of the scale and proportions of the proposed. It is also noteworthy that there is lack of supporting visualisations in the form of computer generated images or artists impressions to allow for a greater understanding of the overall impact of the proposed mounds on the surrounding buildings and greater landscape.

Lastly, and whilst acknowledging that some of the community benefits that the scheme will bring to local residents these are not considered to be sufficient when balancing them against the overall harm that will be caused by the proposals as a whole.

Liz Lake Associates

Landscape Baseline - AONB

However, it is evident that the proposals currently submitted result in the irreversible loss of an important arable farmland mosaic, including the loss of strong hedgerow patterns (evident on historic mapping) and the loss of trees on watercourse, and the loss of arable farmland, the very features the AONB Management Plan seeks to preserve. The loss of significant historic landscape features is confirmed on various plans (including Indigo Tree Survey/ Tree Constraints Plans). As such, some of the key design guidelines and landscape character objectives for the AONB area are entirely compromised by this proposal.

Whilst it is acknowledged that some of the opportunities are met (new woodland, copses, and planting links to the motorway), the extent of earth mounding, and unavoidable loss of key characteristics (hedges and the field pattern) fail to conserve the historic landscape qualities of the area. It is considered that the same objectives could still be met through a redesign without loss of these key features.

Topography

As such, it is considered that introducing new earth mounds/ bunds high above existing, ground planes to this scale and extent, would be a series of alien introductions to the relatively flat parcels of land currently bound by hedges.

Project Specific characteristics

Whilst the report acknowledges some of the characteristics identified in the Landscape Character Assessments at 3.98, it does not mention the historic hedges themselves or their contribution or that they are a key sensitivity, or that of the watercourses which are tree lined.

Instead, it chooses to describe at 3.99 “fairly mundane arable landscape damaged by the intrusion of the motorways, against the high value, high sensitivity landscape of the Chevening Estate parkland, Conservation Area and Church”.

This statement devalues the contribution of the natural and historic features and perceptual aspects of the Site in this sensitive landscape. It incorrectly tries to increase the presence of the motorway by using it as a devaluing tool to justify the scheme in landscape terms, when the fact remains that the majority of the Site itself lies to the west and north of Sundridge Road, whereas the motorway lies to the east and south (albeit close). Only the parcel adjacent to Turvins Farm lies adjacent to the motorway and would have been eroded by the M25.

At the same time, we would acknowledge that the proposals do successfully add some new landscape features (woodland copses, trees, access in the form of a new off road path etc.), but at the expense of other important features. It appears that the proposed scheme has not taken into account the retention or reintroduction of historic features shown below on old maps.

Indeed, the extent of loss of natural features has not been acknowledged in the proposals, and it should clearly be expressed the length of hedgerow and number of trees to be removed, either temporarily for access and permanently from the field patterns.

Green Belt: The proposals constitute an engineering operation and will undoubtedly affect the openness of the Green Belt, contrary to the claim in paragraph 3.104 of the Lloyd Bore report. Both the construction phases of work, the creation of mounds and earth bunding and the long term level changes to the land, will without question harm the openness of the Green Belt. It is not correct to conclude that openness will be preserved.

Summary

The scheme causes harm to local characteristics and features of historic value in landscape terms, that contribute to the character of the area in an area designated as AONB.

It is clear that there may be a scheme of landscape enhancement that is possible within this series of historic fields patterns, but the scheme as presently designed should be reviewed and changed, to reflect a more sensitive approach to the historic landscape, with a more carefully considered review of the key historic landscape features (so they can be preserved) and the local impact of bunding/mounding given its current scale and extent should be removed or dramatically reduced to lessen the harm,

In addition to the reports submitted from the Consultants employed by the Parish Council to look at the proposals and give an independent assessment of the development – Chevening Parish Council comments as follows:-

Chevening Parish Council understands the reasons given by the applicant for the development, but feels the District Council should request the applicant looks at whether there are alternative ways to achieve the screening of the village from the motorway and improving the visual entrance to Chevening village without embarking on such major works.

Wildlife

Chevening Parish Council notes the efforts being made to ensure the effective relocation of wildlife, but question whether this actually needs to take place at all. Inevitably there will be some loss of life as the relocation can never be 100% successful

Parking

The proposal to open the Parkland to the public for one weekend per month is a potential benefit for the residents of Chevening Parish. However, there is no obvious allowance made for the anticipated need for extra parking (think only of the overrun parking facilities at Knole House this year). Chevening Parish Council would like further information on how the potential traffic generated each month will be controlled and where anyone arriving by car will be able to park.

Noise

The bunds appear to be there for the visual impact, both in terms of seeing lorries and the lighting gantries of the M25 – but the documents don't assess whether the disbursement of noise will be impacted by the bunds.

Chevening Parish Council would like assurances that there will be no increased motorway noise post the construction of the bunds on either residents of Crossways House, Phoenix House Turvins Farm and Morants Court Farm or on the wider Parish (specifically Chipstead village)

Air Quality

The Risk Assessment concludes there is no increased risk to the residents of Chipstead – but this doesn't address any potential increased risk to the residents of Crossways House, Phoenix House Turvins Farm and Morants Court Farm

Chevening Parish Council would like assurances that there will be an Air Quality Risk Assessment done on those properties that sit within the 200m threshold of the major road source and whether the bunds will impact their air quality adversely prior to any decision being made

Soil Quality

Chevening Parish Council would like assurances that there will be strict conditions placed on the type and quality of the materials imported onto the site and there will be stringent sampling during the development

Other Major Developments

Chevening Parish Council would like assurances that there will be assessments made on the cumulative traffic impacts of any other major developments granted. If all developments are using the same baseline for "acceptable" traffic movements and their movements are still within the acceptable baseline, the cumulative affect may not be. Specifically the developments at Covers Farm, Fort Halstead, the potential 250 additional houses in Dunton Green and Northern Sevenoaks Masterplan which could all see major additional traffic movements on A25/A224

Traffic

The disruption during construction will not normally be considered as a Material Planning Consideration, but Chevening Parish Council is asking

SDC to put constraints upon the development which it views as sensible and reasonable given the size and scale of the development and the length of time it will take to complete:-

- In the current Covid environment is it sensible to have 80 lorry movements per day through Dunton Green and Riverhead with the impact on air quality for the residents and users of A25 and A224.
Even if the development is permitted to go ahead Chevening Parish Council suggests that any permission be deferred until after the pandemic is over
- The impact of 80 lorries a day will seriously impact the lives of parishioners living on or adjacent to A25 and also the those accessing the A224 from Bullfinch Lane and the A25 from all the residential roads in the Parish. Consideration must also be given to an additional 80 lorry movements on the already highly dangerous A21/A25/Westerham Road junction
Chevening Parish Council would like assurances that there will be assessment of the noise and pollution aspects of the increased traffic on those routes and the impact of the increased traffic on the roads trying to access the A25 and A224
Chevening Parish Council would like assurances that if the development is permitted to go ahead traffic movements along the A25 and A224 are restricted to between 9am and 3pm to avoid the congestion at school time in the area
- ***Chevening Parish Council would like assurances from KCC (and finances earmarked) specifically to repair roads, pavements and verges on the routes to and from the site both during development and once completed***
- Chevening Parish Council has been informed on numerous occasions that there is no possibility of lorries accessing the site having gone through Chipstead village. The Air Quality Survey report seems only to mention the width restrictions (as part of lorry watch) as something which would prevent lorries taking this route.
Chevening Parish Council would like assurances that there will be some form of financial penalties due to SDC/CPC if lorries stray from the agreed routes and volume of lorry numbers
Chevening Parish Council would like assurances that there will be ongoing monitoring of Air Quality on A25 and restrictions placed on further lorry movements on that route if the Air Quality falls below an acceptable level

Public Right of Way

The proposal is to improve the safety of the footpath from St Botolph's to Morants Court farm by tracking up west of Turvin's farm and then east for a short section of the old Pilgrims' way, avoiding a dangerous section of walking on the B2211.

Chevening Parish Council requests that if the development goes ahead, the new footpath route be dedicated as soon as possible and before or immediately at the start of phase 1, to avoid having pedestrians in the road with vastly increased traffic

The residents of Chevening village are already subject to parking disruption and litter as a result of people driving to the village to park and use the footpath. This will only increase with the proposal to open the Parkland and with the enhancements to the footpath

Chevening Parish Council would like assurances concerning the

	<p><i>arrangements for parking on the weekends when the Parkland will be open to the public. There is insufficient parking in Chevening village to accommodate visitors and the village would be blighted if it became a regular venue for food vendors on the days the parkland is open and had to suffer cars and walkers parking and littering the road</i></p> <p><i>Chevening Parish Council are concerned with the utilities which run along Chevening Road into Chevening village and any impact the earthworks will have on them. The connectivity of telephone and broadband at present is poor and any degradation of that service must be prevented</i></p> <p>The Scheme is designed to provide visiting dignitaries with a vastly improved view when approaching and leaving Chevening House. <i>Chevening Parish Council asks that the District Council obtain actual numbers of visiting dignitaries per month over the preceding 5 years to assess the benefits of this scheme to potentially as the parish Council understands it, 12 people per year against the impact on the parishioners for at least 6 years and in a number of cases permanently before making any decision</i></p>
<input type="checkbox"/> No Comment	
FROM:	Judith Hayton – Clerk to Chevening Parish Council
DATE:	19 January 2021



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PLANNING RESPONSE TO PROPOSALS FOR THE CONSTRUCTION OF LANDSCAPED MOUNDS, NEW PLANTING, SURFACE WATER DRAINAGE AND PUBLIC ACCESS.

LAND AT CHEVENING ESTATE

The land in question is located to the south-east of Chevening House and forms an area of 38.90 Hectares comprising if mostly arable land. It forms a natural landscape and its borders are denoted with hedgerow which also form field boundaries within the site. It is physically separated from Chevening House, a Grade 1 Listed building by way of high walls and St Botolphs Church (a Grade 1 listed building) and the cluster of listed buildings make up the village and Conservation area of Chevening.

It is intended to construct four large, landscaped mounds on the land by importing some 760,000 cubic metres of soil to the site. These mounds will form part of what is described as an enhancement scheme comprising :

- New earth contouring and planting to extend the Chevening estate designed parkland into the south eastern quadrant of the estate, and to mitigate views within the landscape of the M25 motorway, moving vehicles and lighting columns;
- Introduction of new waterbodies for visual amenity, drainage and habitat creation;
- Conversion of arable land to parkland and grazing;
- Extensive planting works of native species trees, shrubs and meadow grassland;
- Creation of new footpath along Sundridge Road and informal permissive path through the site;

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- Long term landscape management as grazed parkland and woodland.

The open qualities of the site is protected by its Green Belt status. Its visual qualities by its Area of Outstanding Natural Beauty designation. Lastly, several heritage assets are in close proximity to the site, including Chevening House (Grade 1 Listed), St Botolph's Church (Grade 1 Listed Building) and Chevening Village,(Grade II Buildings) and Conservation Area.

Green Belt Impact

Guidance in the National Planning Policy Framework (NPPF) sets out the government's policy in relation to Green Belts. Inappropriate development is, by definition, harmful to the Green Belt and should not be approved other than in very special circumstances. Substantial weight is to be given to any harm to the Green Belt. Very special circumstances to justify inappropriate development will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm arising is clearly outweighed by other considerations. The main issue is therefore whether the mounds amount to inappropriate development in the Green Belt and if so, whether the harm by reason of inappropriateness and any other harm is clearly outweighed by other considerations so as to amount to the very special circumstances required to justify the development.

Paragraph 146 of the NPPF states that certain other forms of development (including engineering operations) are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. In my view, openness in this context means a sense of being undeveloped; buildings clearly compromise openness, but so would other development that gave any sense of being "man-made". The four mounds, even with landscaping would register as an artificial feature that would interrupt the natural contours that flow south from the church to Sundridge Road. The physical mass of the mounds would result from the deposit, compaction and moulding of a considerable amount of soil materials. The engineering operation would take up to 5 years, an indication of the scale of the work proposed. As such it is considered that the mounds would appear as man-made features that would not maintain openness.

Very Special Circumstances

Paragraph 143 of the NPPF states that “Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances”. Paragraph 144 states that “very special circumstances” will not exist unless the potential harm to the Green belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”. It has been established that the development amount to inappropriate development in Green Belt terms and the applicants have put forward a number of “community benefits” to support the application which include visual screening of the M25 from heritage assets; the introduction of landscaping; new paths within and outside of the site; attenuation of flooding on local roads with new drainage ditches etc. habitat gain and bio diversity enhancements.

There is nothing in the documents submitted with the application that alternative screening could not be provided which would be less harmful to the landscape with the scheme still being able to deliver the “community benefits” stated. We take the view therefore that these benefits do not amount to very special circumstances that outweigh the substantial visual harm caused by the proposals.

Area of Outstanding Natural Beauty (AONB).

The site is located within the Kent Downs AONB. AONB’s are designated by the Government for the purpose of ensuring that the special qualities of our finest landscapes are conserved and enhanced. In planning policy terms they have the same status as National Parks.

The application site is an attractive designated landscape, within which users of the public rights of way, including the North Downs Way, that run to the north of the site enjoy an open panorama when travelling along the elevated position. The Grade 1 listed church (St Botolphs) represents a focal point which can be viewed from some distance in all directions. Within this landscape setting there is nothing comparable to the proposed mounds. Indeed, the questionable position of the applicants in so far as the mounds will prevent views of the motorway from Chevening House is made somewhat ironic in that they are replacing one visible impact with another and underlines the adverse impact the proposed mounds would have on what is an open and highly visible location. The mounds are likely to further emphasise the linear form of the motorway and exaggerate

its visual impact in views from the public rights of way. The mounds would therefore be an incongruous feature at odds with the natural contours of the land.

Traffic

It is acknowledged that traffic generation caused by HGV's delivering materials to the site will take place during the construction period and therefore has limited material weight in the determination of the application. Nevertheless, it is estimated by the applicants that this development will be phased over a period of 5 years and therefore the degree of activity and level of disturbance to neighbouring properties will be substantial. The Construction Management Action Plan identifies the number of HGV deliveries per day will be limited to 100, although an average of 65 per day is expected. This volume of heavy vehicles moving through roads, generally unsuitable for such traffic is likely to create traffic congestion, added vibration and pollution to local residents.

Even with a Traffic Management Plan in place controlling numbers of vehicles and permitted routes, it is likely that the local residents will experience a significant loss of amenity to their lives over a relatively long period of time.

Comment

The application submission makes a case that the mounds will reduce the physical impact of the motorway on Chevening House or indeed from all Heritage Assets in close proximity to the site. However, less than substantial evidence has been produced in the form of sight lines to demonstrate what existing views there are from principally the House to the motorway and how these views will be screened by the proposed mounds. Even if it is accepted that the mounds do reduce the visual impact of the motorway, it is our view that such screening could be achieved without the need for works of the scale and proportions of the proposed. It is also noteworthy that there is lack of supporting visualisations in the form of computer generated images or artists impressions to allow for a greater understanding of the overall impact of the proposed mounds on the surrounding buildings and greater landscape.

Lastly, and whilst acknowledging that some of the community benefits that the scheme will bring to local residents these are not considered to be sufficient when balancing them against the overall harm that will be caused by the proposals as a whole.

An overview of Landscape and Visual Matters for Chevening Parish Council and ADN Planning

Regarding Chevening Estate near Sevenoaks, Kent

“Chevening Estate Parkland enhancement, including construction of landscaped mounds, new planting, surface water drainage and public access”.

**Application Reference: 20/03660/FUL LPA:
 Sevenoaks District Council**

The application states that this proposal is for *“landscape enhancement works including earth modelling and creation of new parkland”*¹.

The land itself forms part of the Chevening Estate to the extent that it is under the same ownership of the estate; however, it is evident that the Site (to the east of Chevening Lane) for which the proposals have been prepared is entirely separate, both spatially and visually, and forms part of the wider agricultural farmland of contrasting character, compared to the more private, contained walled estate with its designed gardens and parkland, which are within the grounds of Chevening Park (a designated Registered Park and Garden). Furthermore, the existence of these strong character contrasts today, is also continuous through the historic map regression (even on 1869 mapping – see below) and have barely changed over time.

One important change that has occurred beyond Sundridge Road (to the east and south) is the M25/A21, which now crosses through the landscape. However, its visual presence is relatively low key (except at very close quarters close on part of Sundridge Road), even in winter months when there is less leaf cover, and the motorway has been relatively well integrated into the landscape. The Kent Landscape Assessment recognises this since, *“The embanked and vegetated motorway is a recent element in the rural landscape”*², and the Sevenoaks

¹ Lloyd Bore DAS, 1. Introduction

² Lloyd Bore ref from Landscape and Visual Appraisal, p.22

Assessments similarly confirms, "*the landscape is enclosed by the M25/M26 motorway embankments*". The motorway is audible in certain conditions; however, this is not a noise reduction scheme.

The application is accompanied by a Landscape and Visual Appraisal and a Design and Access Statement (both by Lloyd Bore), amongst many documents.

Landscape Baseline

AONB: The Site falls squarely within an Area of Outstanding Natural Beauty (AONB), within the LCA Darent Valley, in the Kent Downs AONB Management Plan³ area, which records the important landscape features as being,

- Strong hedgerow patterns on valley sides
- River with tree lined corridor
- Much of the floodplain is arable farmland

However, it is evident that the proposals currently submitted result in the irreversible loss of an important arable farmland mosaic, including the loss of strong hedgerow patterns (evident on historic mapping) and the loss of trees on watercourse, and the loss of arable farmland, the very features the **AONB Management Plan** seeks to preserve. The loss of significant historic landscape features is confirmed on various plans (including Indigo Tree Survey/ Tree Constraints Plans). As such, some of the key design guidelines and landscape character objectives for the AONB area are entirely compromised by this proposal. The NPPF at paragraph 172 makes very clear 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....*", and "*.....The scale and extent of development should be limited. Planning permission should be refused for major development other than in exceptional circumstances...*".

The **Kent Landscape Assessment** similarly takes account of the landscape being in Moderate condition and Moderate Sensitivity, stating that, "*The landscape pattern is coherent, flowing from the wooded ridge of the Downs, through the large arable fields of the lower slopes, down to the pastures and parklands nearer the river, providing strong clusters of ecological importance*". However, the study also recognises the sensitivities associated with the loss of key features, since "*....the loss of hedgerow and intensive arable cultivation on the lower slopes of the chalk*

³ Extracts from Lloyd Bore Landscape and Visual Appraisal p.19

escarpment....". It also clearly states a key sensitivity as being, ".....the historic land use pattern is becoming indistinct as hedges and ditches disappear"⁴.

The Kent (County level) Assessment (as referred to on p.22 of the Lloyd Bore Appraisal) also recommends actions for the LCA to "*conserve and create*". Whilst it is acknowledged that some of the opportunities are met (new woodland, copses, and planting links to the motorway), the extent of earth mounding, and unavoidable loss of key characteristics (hedges and the field pattern) fail to conserve the historic landscape qualities of the area. It is considered that the same objectives could still be met through a redesign without loss of these key features.

The **Sevenoaks Landscape Character Assessment (2017)**⁵ identifies the Site as being mostly within LCA 8a Upper Darent Valley – West but overlapping at the fringes of the 6a Chevening Scarp Foot Farmland, to the extent that both have relevance to the Site and the proposals – both assessments highlight key characteristics and sensitivities.

6a Chevening Scarp Foot Farmland: As well as the notable historic parkland at Chevening, the 6a Chevening Scarp Foot Farmland highlights the historic nature of field patterns, "*Undulating slopes at the foot of the North Downs scarp underlain by lower chalk. Regular parliamentary fields and older field pattern resulting from post medieval informal enclosure bounded by narrow hedged lanes and tracks...."*

The assessment states that, "*Medium scale fields bounded by a network of mature hedgerows and shaws. Some internal field boundaries have been removed...*" and it confirms the condition as having, "*an intact and well defined pattern of fields either side of the Pilgrims Way and intact areas of historic parkland, including Chevening Park, which contribute positively to landscape condition*".

As such the key sensitivities of the LCA include the "*historic field pattern of regular parliamentary fields and older informal post medieval enclosures contributes to local distinctiveness*", and "*the hedgerow network and shaws which contribute to the local landscape pattern*", and "*open views across the fields and to the scarps are locally distinctive*".

8a Upper Darent Valley - West: similarly, this describes a historic field pattern as being, "*a mixture of small regular fields from 19th century parliamentary enclosure and older irregular fields, disturbed along major transport routes....*", and a "*mixed land use of arable and pasture contained by mature hedgerows ...*".

⁴ Lloyd Bore Landscape and Visual Appraisal, 3.78 p.22

⁵ Lloyd Bore Landscape and Visual Appraisal, p.23 to 25.

Topography: the plan shown on the Figure 5⁶ perfectly illustrates the unchanged nature of the landform in the area. The Site is relatively flat, with very gentle changes, set about the 93m AOD (falling between c.100m and 86m north to south) with no dramatic undulations or escarpments, which are only present in the wider area. The contrast in topography is marked, since the Site lies in the shallow sides below the North Downs ridge, which is a dramatic natural landform rising to above 239m AOD. The North Downs ridge forms a prominent backdrop and landmark in views across the area. As such, it is considered that introducing new earth mounds/ bunds high above existing, ground planes to this scale and extent, would be a series of alien introductions to the relatively flat parcels of land currently bound by hedges.

The proposals include sections, which appear to show four main areas of earth mounding and one area of reduced levels for a water body. Two mounds to the north of Sundridge Road, appear to extend to approximately c.6m height and c.8m height above ground level, and will reduce the amount of visual openness in the landscape and interrupt views of the scarp on the North Downs, and prevent serial views of Chevening Church. On slightly higher ground to the west of Sundridge Road, close to Turvins Farm, the new landform will be increased by around 11m, exceeding the height of the adjacent residential properties and farm buildings. Meanwhile, land to the east of Sundridge Road (south of the farm) will be increased by approximately c.7m above existing levels.

Project Specific characteristics

Whilst the report acknowledges some of the characteristics identified in the Landscape Character Assessments at 3.98, it does not mention the historic hedges themselves or their contribution or that they are a key sensitivity, or that of the watercourses which are tree lined.

Instead, it chooses to describe at 3.99 "*fairly mundane arable landscape damaged by the intrusion of the motorways, against the high value, high sensitivity landscape of the Chevening Estate parkland, Conservation Area and Church*"⁷.

This statement devalues the contribution of the natural and historic features and perceptual aspects of the Site in this sensitive landscape. It incorrectly tries to increase the presence of the motorway by using it as a devaluing tool to justify the scheme in landscape terms, when the fact remains that the majority of the Site itself lies to the west and north of Sundridge Road, whereas

⁶ Lloyd Bore Figure 5, Landscape and Visual Appraisal, p.10

⁷ Lloyd Bore Landscape and Visual Appraisal, p.26 para 3.99.

the motorway lies to the east and south (albeit close). Only the parcel adjacent to Turvins Farm lies adjacent to the motorway and would have been eroded by the M25. The remainder of the land has always been bounded by Sundridge Road, so the greater part of the Site has always remained intact. The fact is that for the most part, the majority of the historic field parcels that comprise this Site have not been damaged in any way by the motorway, they are entirely separate to it, see historic mapping below. The intrusion caused by further large scale bunding and earthworks and further loss of historic landscape features on this Site would cause more harm to the character of the land and the landform. At the same time, we would acknowledge that the proposals do successfully add some new landscape features (woodland copses, trees, access in the form of a new off road path etc.), but at the expense of other important features. It appears that the proposed scheme has not taken into account the retention or reintroduction of historic features shown below on old maps. Indeed, the extent of loss of natural features has not been acknowledged in the proposals, and it should clearly be expressed the length of hedgerow and number of trees to be removed, either temporarily for access and permanently from the field patterns.

Historic Map Extract – circa 1869



Green Belt: The proposals constitute an engineering operation and will undoubtedly affect the openness of the Green Belt, contrary to the claim in paragraph 3.104 of the Lloyd Bore report. Both the construction phases of work, the creation of mounds and earth bunding and the long term level changes to the land, will without question harm the openness of the Green Belt. It is not correct to conclude that openness will be preserved.

Summary and Conclusions

The proposals do not provide any visualisations or wireframes of the proposed land raising, which appears to be additional material extending to c.11m above existing levels. Preparing further illustrative material (verified wireframes of existing and proposed landforms) would enable the scale and nature of proposals to be better understood.

The scheme causes harm to local characteristics and features of historic value in landscape terms, that contribute to the character of the area in an area designated as AONB.

It is clear that there may be a scheme of landscape enhancement that is possible within this series of historic fields patterns, but the scheme as presently designed should be reviewed and changed, to reflect a more sensitive approach to the historic landscape, with a more carefully considered review of the key historic landscape features (so they can be preserved) and the local impact of bunding/mounding given its current scale and extent should be removed or dramatically reduced to lessen the harm,

- Historic mapping should form the basis for any 'enhancement scheme' of the historic landscape to provide a guide as to the opportunities for enhancement, and to limit the imposition of new unnatural man-made earth mounds that lead to the loss of key features.
- Historic hedges and the field pattern should be fully preserved (not removed), but enhanced and reinforced.
- Streamside/watercourse and associated riverine trees and vegetation should be retained and supplemented.
- Retained field patterns could/should have wider margins for the benefit of wildlife, within land used reverted to grazing pasture or retained as agriculture.

- Access for local people and visitors is welcome, as to take pedestrians off the Sundridge Road carriageway and provide a better link between existing Rights of Way is beneficial; however, this should be a continuous year round provision to be of full benefit to the local community perhaps through a Rights of Way application (designation) to ensure delivery.
 - The scale and extent of earth mounding as shown is unnecessary and, if required, it should be far less in quantity and extent and height and only be that which is absolutely necessary to aid with screening of the motorway corridor. Indeed, we are not convinced that earth mounding is required at all. It may be that woodland or copse planting alone can provide a solution and that bunding of any kind may well be totally unnecessary, the same outcome can be achieved with an appropriate planting scheme. The 1869 map shows the prior existence of former planting whereas bund is now proposed, it would simply be best to implement the planting of trees as a starting point to achieve the same end goal.
 - Woodland, woody copse and hedge planting is welcome and will help reinforce the historic character of the area if carried out in the right way and located in line with landscape character guidelines.
 - Open views to the scarp slopes of the North Downs and Chevening Church should be maintained and not blocked by introduced mounding of earth on the lower slopes (particularly along Sundridge Road). We disagree (for example) with the effects assessed for Viewpoint B on Sundridge Road (page 47), which rightly acknowledges that views of the escarpment and church will be lost, but claims (wrongly) that there are visual benefits to be gained from the grazed parkland and water in this view – however, these elements will not be visible in this view (they are at ground level behind the retained hedge), the new element visible in this view will be the introduced man-made mounding, which will clearly be above the height of the hedge – this represents a harmful adverse effect, and is one example of a number of concerns with the proposal and the assessment.
 - The character of Chevening Road and Sundridge Road should be maintained and enhanced. There are concerns regarding the extensive loss of hedgerow along both roads, where it is considered the open views sought can be maintained by regular hedgerow management. For example, on Sundridge Road it is unclear/ not stated how much hedgerow loss will be needed for the proposed 'haul route' crossing from the compound area to the Site, but it would appear necessary.

Overall, we hope these comments are helpful and provide some assistance to the Parish Council.

Liz Lake Associates

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