SEVINGTON

INLAND BORDER FACILITY

Department for Environment, Food & Rural Affairs

HM Revenue & Customs

Department for Transport

Environmental Statement Volume 3: Landscape and Visual Impact Assessment

April 2025

waterman

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Comments

Disclaimer

Contents

Figures

1. Introduction

1.1 This document comprises Volume 3 of the Environmental Statement (ES) prepared by Waterman Infrastructure & Environment Ltd (Waterman) on behalf of DfT, HMRC and Defra ('the Applicant') for the continued use and operation of the Sevington Inland Border Facility (IBF), Ashford (hereafter referred to as 'the Development').

1.2 The land occupied by the IBF ('the Application Site') covers an area of approximately 48 hectares (ha). The Application Site is located southeast of Ashford, at Junction 10a of the M20, approximately 50 miles south-east of London. It is centred on Ordnance Survey Grid Reference TR 03501 40700, and it falls within the Kent County Council and Ashford Borough Council administrative boundaries. The Application Site location is shown in Figure 1.

1.3 The Development comprises the current operational IBF, including goods vehicle parking for up to 984 vehicles, border checking facilities, security fencing, noise attenuation bunds and fences, CCTV and lighting columns, drainage, and all associated engineering and landscaping works. The estate roads, sustainable drainage system and landscaping already benefit from planning permission (ref. 19/00579/AS).

1.4 This report presents the findings of a desktop study and field assessment carried out in December 2024. This report describes the relevant landscape planning context as well as other designations or environmental constraints relevant to the Application Site. It then describes the landscape character and visual amenity of the surroundings and analyses the key views towards the Application Site and the potential effects which would result as a consequence of the Development.

1.5 This report assesses the likely significant effects of the Development upon sensitive receptors in the vicinity of the Application Site associated with:

- Landscape Effects: the effects of the Development on the physical and cultural characteristics of the Application Site and on the surrounding landscape character; and
- Visual Effects: the effects of the Development on views from visual receptors and on the amenity value of these views.

1.6 This chapter is supported by figures as identified on the contents page.

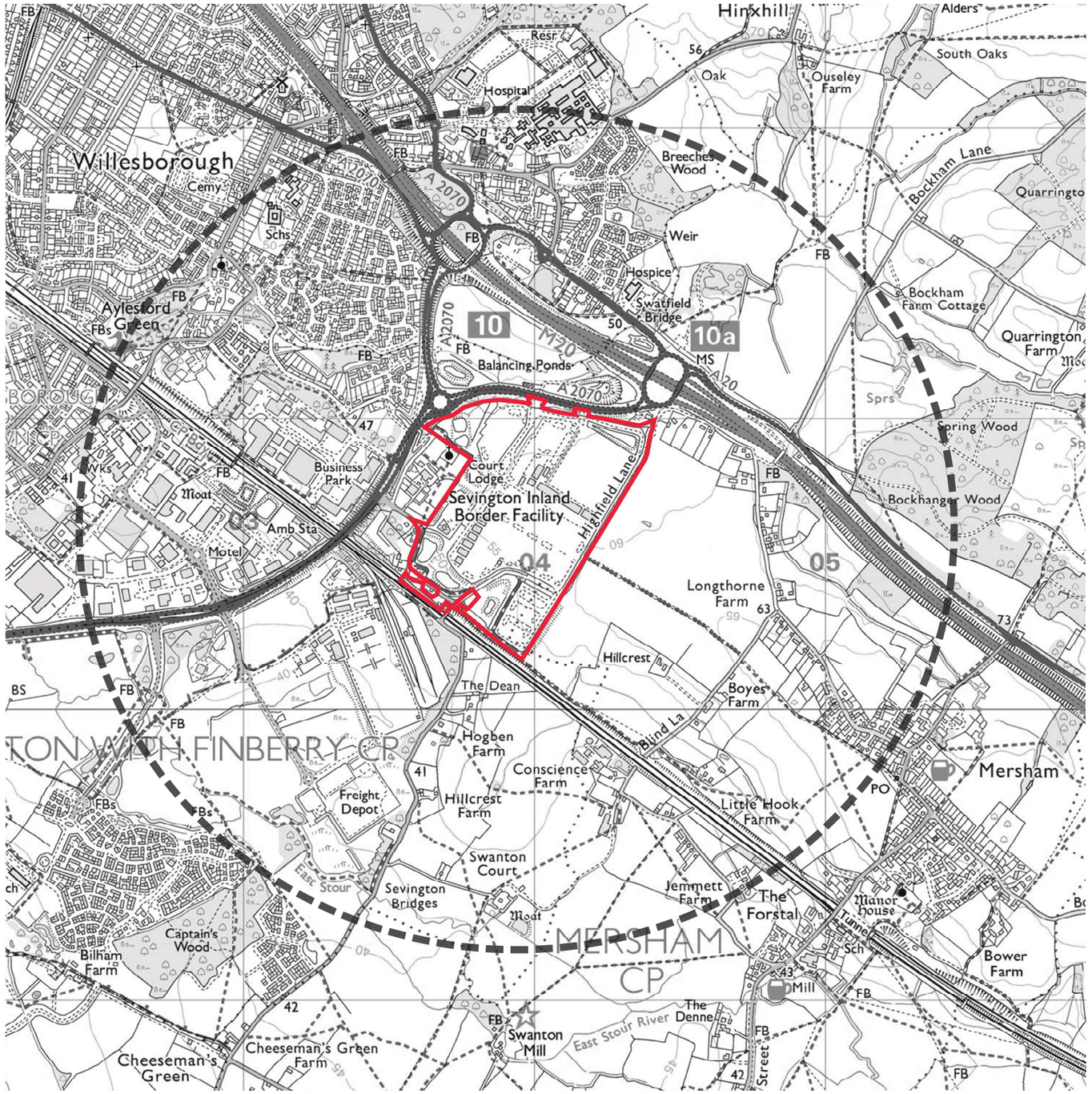

Figure 1: Site Location Plan

2. Methodology and Assessment Criteria

Overview

2.1 The aim of the landscape and visual impact assessment is to establish the following in relation to the Development:

- an understanding of the Application Site and its wider landscape setting, identifying its character, resources, value and sensitivity to the Development;
- an assessment of the composition, character and aesthetic value of views from visual receptors including occupiers of residential properties, views from people using amenity landscapes, and the sensitivity of views;
- the potential direct and indirect effects of the proposal on the landscape resource (i.e. key elements, features and character) and on visual receptors; and
- commentary on the residual effects on the landscape character and visual amenity in relation to the Development scenario, and compliance with landscape policy.

2.2 This assessment considers two inter-linked issues as follows:

- Landscape Effects: the effects of the Development on the physical and cultural characteristics of the Application Site and on the surrounding landscape character; and
- Visual Effects: the effects of the Development on views from visual receptors and on the amenity value of these views.

2.3 The methodology for the assessment is based on current best practice and guidance from the following sources:

- 'Guidelines for Landscape and Visual Impact Assessment'[1], Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA), Third Edition, 2013;
- 'An Approach to Landscape Character Assessment' [2], Natural England 2014; and
- 'Visual Representation of Development Proposals'[3], Landscape Institute, 2019.

2.4 This report has taken into consideration the Scoping Opinion provided by ABC on December 19th 2024 (ABC Ref. OTH/2024/2051). Section 5.8 of the Scoping report summarizes the scope for the Landscape and Visual impacts.

Summary of Construction-related Effects

2.5 As the IBF is already built and operational, construction impacts were scoped out of the ES. However, in response to the EIA Scoping Request, ABC requested a summary of construction effects within each relevant ES chapter.

The findings of the landscape and visual assessment, set out within the March 2022 SDO may be summarised as:
A full assessment of landscape and visual impacts is in Appendix F [of the Analysis of Likely Environmental Effects of the Development, 2022]. Temporary compounds and stockpiling east of Highfield Lane may contrast with the agricultural landscape but will be set within existing infrastructure. Of five Landscape Character Areas (LCAs) assessed, only LCA 2 (Mersham Farmlands) will be directly affected, though impacts are limited and not significant. Best-practice measures to minimize minor adverse effects include:

- Seeding stockpiles (max 2m) and positioning them away from residences.
- Using minimal, directional lighting.
- Keeping the site tidy with just-in-time material deliveries.

2.6 These measures will be in the CMP and followed by the Principal Contractor. Of 18 assessed receptors, five will experience temporary foreground changes, but these are short-term and not significant. Views over the eastern field may also be affected by biodiversity works, but existing vegetation and quick implementation of bunds and planting will limit impacts. These measures will be in the CMP.

Establishment of Baseline Data

2.7 The baseline work adopted for the landscape and visual impact assessment comprises a combination of desktop and field studies to identify and record the character, elements, features and aesthetic and perceptual factors. The baseline has been formed in consideration of the data prior to the construction of the SDO and by taking into account the reserved matters application of Phase 1A. The baseline data were established through the following:

- a review of all relevant documents and landscape planning policy and guidance;
- Geographical Information System (GIS) analysis of the topography surrounding the Application Site and production of the Zone of Theoretical Visibility (ZTV);
- an Application Site visit to undertake an assessment of the character of the area, together with the sensitivity of the landscape to change as well as to obtain photographs of key viewpoints from around the Application Site; and
- identifying and describing the key features associated with the Development that would alter the characteristics of the landscape and visual baseline.

Definition of Receptor

2.8 Baseline data along with the description of the Application Site, form the basis for the identification and description of the changes that would result in the landscape and visual amenity of the area. The landscape resource needs to be understood in terms of its constituent elements. These elements include its character and the way this varies spatially, its geographic extent and history. It also covers its condition and the way it is experienced, including the value attached to it. A receptor is a defined aspect of the landscape resource that has the potential to be affected by the Development.

2.9 The visual baseline establishes the area in which the Application Site may be visible, the different groups of people who may experience views of the Application Site, the places where they would be affected and the nature of the views and visual amenity at those points. Visual receptors are individuals and/or defined groups of people who have the potential to be affected by the Development.

Landscape Baseline

2.10 The landscape baseline includes an overview of the elements that form the landscape baseline for the assessment, using text and graphical representation to describe:

- topography;
- cover, distribution and type of land use and open space, including statutory and non-statutory designations relevant to the landscape and visual assessment like Areas of Outstanding Natural Beauty and Open Access Land;
- development patterns and scale, including age, massing and density of buildings, levels of enclosure, building materials and landmark features;
- vegetation patterns and extents;
- transport routes and Public Rights of Way, National Trails and other routes to include roads, railways, cycleways, bridleways, footpaths, historic green lanes and waterways;
- heritage features, including Conservation Areas, Listed Buildings, Registered Parks and Gardens and other historic components; and
- existing landscape character assessments prepared by authorities including national level character assessment.

2.11 Within published landscape character assessments, Landscape Character Areas (LCAs) are defined as areas with broadly homogeneous characteristics. The identification of LCAs is influenced by the published landscape character assessments and subsequently refined by fieldwork. These LCAs form the basis of the assessment of potential impacts on landscape character.

Visual Baseline

2.12 A computer-generated Zone of Theoretical Visibility (ZTV) map was produced to illustrate the areas where the Development will potentially be visible within the surrounding area (**Figure 5**). The ZTV was generated at an approximate height of 12m including roofs and a blanket across the Application Site to represent the approximate size and massing of the Development. The analysis has been produced to assist in Viewpoint selection and to provide an appreciation of the potential influence

1 Landscape Institute and Institute of Environmental Management and Assessment, 2013, Guidelines for Landscape and Visual Impact Assessment Third Edition, Routledge

2 Christine Tudor, October 2014, An Approach to Landscape Character Assessment, Natural England.

3 Landscape Institute, 2019, Technical Guidance Note 06/19 Visual Representation of Development Proposals, Landscape Institute

of the Development on the wider landscape. **Table 2** summarises sensitivity criteria of potential visual receptors, which has further informed the Viewpoint selection.

2.13 The ZTV has been compiled using LiDar data comprising spot heights and contours (within a 2m resolution) to produce a Digital Surface Model (DSM). The DSM was overlain on a 1:25,000 Ordnance Survey base map.

2.14 The use of this type of ZTV map is considered good practice and is useful as a tool to assist in assessing the visibility of the Development within the Application Site. However, it should not be considered an absolute measure of visibility. Whilst a ZTV map indicates the potential area from which it might be possible to secure views to part(s) of the Application Site, the use of the map needs to be qualified on the following basis:

- there will be a number of areas within the ZTV where it might be possible to view parts of the Development, but that may not be accessible to the general public or well frequented;
- a ZTV map does not account for the complete effects of screening and filtering of views as a result of intervening features, such as buildings, trees, hedgerows, weather conditions; and
- a ZTV map does not account for the likely orientation of a viewer, for example when travelling in a vehicle.

2.15 The combined effect of these limitations means that ZTV mapping tends to over-estimate the extent of visibility; both in terms of the land area from which the Application Site is visible, and the extent of visibility of the Application Site from a particular viewpoint. Therefore, ZTV maps may not truly represent the 'visual impact' of the Application Site.

Evolution of Baseline and Future Baseline

2.16 In accordance with the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)[4] (EIA Regulations), the ES should include consideration of the likely evolution of baseline if the Development were not to come forward, which is considered to comprise the future baseline is outlined in **Section 4**. This assessment considers a scenario in the absence of the Development being implemented to determine the likely evolved baseline conditions and is based on professional judgement.

Site Survey and Photography

2.17 Viewpoint locations were established in line with the Scoping Opinion that was provided by ABC (ABC Ref. OTH/2024/2051) and in line with the baseline photography from the Stour Park outline application (2015). The locations were also reviewed through a desk-based research which has then been verified through site fieldwork. The selected points are considered as being the best locations for representative views of the Development as see from a key receptor.

2.18 As agreed via the Scoping Opinion that was provided by ABC on December 19th 2024 (ABC Ref. OTH/2024/2051) **paragraph 5.8.2**, the baseline photography from the Stour Park outline application (2015) will be used in this assessment, in order to provide the baseline views. This photography is considered to be acceptable, as many of the SDO viewpoint locations align with those included for Stour Park and provide sufficient representation of the baseline views likely to have existing in 2019/2020(pre-IBF).

2.19 The site survey of the representative views was conducted on December 2024 in optimal conditions, being of clear weather and good atmospheric conditions for optimal visibility during the winter season. The views captured on December 2024 are presenting the effects of the Development at its complete and operational stage (in contrast with the baseline photography, showing the Site at a pre-construction stage). It is acknowledged that differing visual effects are possible due to seasonality and that the winter view provides clearer prospects where deciduous vegetation intervenes. The survey was undertaken mid-winter to provide a worse-case scenario of visibility due to minimal seasonal leaf cover.

2.20 During the site survey the photography that was obtained was during operation of the Application Site from representative viewpoints. As a result the need for Accurate Visual Representations (AVRs) was negated. All photographs were taken with a digital equivalent of a 35mm SLR camera, with 50mm focal length lens, at approximate adult eye level (1.6m). They seek to illustrate the full extent of the Development and visibility of the Application Site within the local landscape that would be experienced at each viewpoint.

2.21 The photographs of representative viewpoints are provided within in this report to aid the reader's understanding of the assessment of visual effects. These photographs have been annotated as appropriate. AVRs have not been produced as part of this assessment as photography was taken at pre-construction stage and at operational stage.

Assumptions and Limitations

2.22 The visual analysis is based on views from external spaces within the public domain and not from inside buildings or private spaces. However, comment and assessment in relation to views from private spaces will be made where appropriate.

2.23 The assessment process aims to be objective and to quantify effects as far as possible. However, it is recognised that subjective judgement is appropriate, if it is based upon training and experience, supported by clear evidence, reasoned argument and informed opinion. Whilst changes to a view can be factually defined, the evaluation of landscape character and visual effect does require qualitative judgements to be made. The conclusions of this assessment therefore combine systematic observation and measurement with informed professional interpretation.

2.24 As it was not possible to obtain the baseline views for the SDO application, the photography from the Stour Park has been utilised, as many of the viewpoint locations of the two applications align with each other. During the site survey of the representative viewpoints, best efforts were made to capture views from the same location and distance from the Application Site. However, it is recognised that certain views would be out of context if taken from the exact same location, due to change of the landscape and re-direction of PRoWs. As a result, certain proposed views were taken from a location as close as possible to the originals, in order to keep them in context.

Methodology for Assessment of Effects

Approach to Assessing Likely Significant Effects

2.25 To predict and describe the effects on the landscape and visual resource, baseline information is combined with the different components of the Development during the **completed** and **operational** phases and considers:

- landscape character and resources, including effects on the aesthetic values of the landscape caused by changes in the elements, characteristics, character and qualities;
- designated landscapes, registered parks and gardens, and recreational interests; and
- visual amenity, including effects upon potential viewers and viewing groups caused by changes in the appearance of the landscape as a result of the Development.

2.26 The assessment takes into account the spatial and temporal nature of potential effects as follows:

- **direct effects** are those imposed on landscape elements on the Application Site (those that occur within the Application Site) as a direct result of Development, such as the loss of existing trees or other vegetation;
- **indirect and secondary effects** may occur some distance from the Application Site (outside of the Application Site, but within the study area) as a consequence of the Development occurring, such as the removal of screen vegetation which would allow views in from surrounding areas;
- **permanent or temporary effects** - temporary effects predominantly arise during construction, whereas permanent effects predominantly arise once the scheme has been completed. However, it is recognised that the construction period may have both temporary and permanent effects arising; and
- **adverse effects** are those that cause detriment to the pre-development situation; beneficial effects are those that restore or improve the landscape; and neutral effects might change the existing situation, but on balance make the situation neither better nor worse.

4 HMSO, 2017. Town and Country Planning (Environmental Impact Assessment) Regulations 2017

Scope of Assessment

Spatial Scope

2.27 Due to the nature of the landform in the surrounding landscape and the outcome of the ZTV analysis, a study area constituting 1km from the Application Site boundary was considered to be appropriate. The topography of the area and the intervening vegetation will help to shield views towards the Site. However, due to the dark skies assessment it is likely that the Development will affect viewpoints in excess of the 1km radius. As a result this assessment will consider representative views from strategic locations beyond the study area, such as Kent Downs National Landscape which is located approximately 5km from the Application Site. Furthermore, we have assumed that the nature of the Development will not exceed 12m height and will not be easily visible from further distances and above vegetation level.

Temporal Scope

2.28 The site survey was carried out in December 2024 during the winter season to establish the landscape and visual baseline during the winter/summer months, when potential screening from deciduous trees would be diminished due to loss of their leaves. The assessment is also undertaken based on the winter baseline conditions.

Assessment of Sensitivity, Magnitude and Significance

Sensitivity

2.29 The value and condition ascribed to landscape contributes to an understanding and consideration of the potential sensitivity of a character area. The condition of the character area is based on the physical state of the landscape, including its intactness and the state of repair of individual features and elements using the following criteria:

- Good: components are regularly maintained to a high standard;
- Fair: components are relatively well maintained; and
- Poor: components are poorly maintained or damaged.

2.30 The likely value of the character areas is based on which users may value the areas, and where relevant, any statutory, non–statutory or local plan designations. The presence of combinations of attributes should be considered when ascribing the value of a character area. Based on the guidance provided within the Guidelines for Landscape and Visual Impact Assessment (GLVIA) [3rd Edition] the factors influencing the value of the landscape are set out in **Table 1**.

Table 1: Landscape Value Criteria

Value of the Landscape	Criteria
Internationally valued	World Heritage Sites Part of an internationally recognised element of the country's character of interest to international tourism
Nationally valued	National Parks Areas of Outstanding Natural Beauty Listed Buildings and some Conservation Areas Scheduled Monuments
Locally valued	Designated areas by local authorities e.g. special landscape areas and Conservation Areas A public, semi- public private open space that is of value to the local community
Limited value	Commercial, industrial or disused area providing little value to the community or residents

2.31 Sensitivity is a term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and knowledge of the condition and value related to that receptor. The overall sensitivity of the landscape can be defined as embracing a combination of the sensitivity of the landscape resource (in terms of both its character as a whole and the individual elements contributing to character) and the visual sensitivity of the landscape. In some cases, whilst an area may fall within a statutory designation, character and visual amenity will vary and as a result, different sensitivity levels may be applied to neighbouring areas within the designation. The criteria used to assess the sensitivity of landscape and visual receptors are set out in **Table 2**.

Table 2: Sensitivity Criteria

Sensitivity to Change	Criteria	
	Landscape Receptor	Visual Receptor
High	Internationally or nationally statutory designated/ recognised landscape of high quality and distinctive character with a large number of features and strong sense of place; A relatively undisturbed, pristine landscape where changes or disruptions to the existing landscape would be noticeable and difficult to mitigate or restore; Where features or sense of place is diminished, a lower sensitivity may apply; Susceptible to change which would permanently alter key characteristics and elements of the landscape (e.g. World Heritage Site, Biosphere Reserve, National Park, National Landscape).	Receptors with a key interest and expectation of enjoying the view (i.e. walkers, horse-riders); Residents in homes who have open, uninterrupted views in the direction of the Proposed Development; Receptors are more likely to be highly sensitive within a nationally or internationally designated landscape.
Medium	Locally designated/ recognised landscape with some distinctive and/ or designated characteristics and features in reasonable condition; Landscape of relatively widespread and common features or characteristics, capable of tolerating moderate levels of change without affecting the key characteristics and elements (e.g. Local Green Space, Local Nature Reserve).	Visitors at locations where the view is valued but not fundamental to the location or activity (e.g. people in outdoor recreation that does not focus on an appreciation of the landscape; Residents in homes who have views in the direction of the Proposed Development where the quality, condition and extent of the existing view is unexceptional (e.g. some high density suburban areas); People travelling on local roads or on trains with specific interest in the view but where viewing periods are discontinuous and/ or irregular; Receptors are more likely to be of medium sensitivity within locally valued landscapes.
Low	Undesignated landscape with local value but low quality; Few distinctive characteristics, features or elements many of which may be in poor condition; Landscape capable of tolerating substantial change/ improvement/ enhancement.	People engaged in activities that either distract from the view or require concentration on the foreground, resulting in minimal interest or appreciation of the view (e.g. people at work), motorists travelling not for the specific enjoyment of the scenery or people engaged in sports or recreation where the focus is more on the activity rather than the view; Receptors are more likely to be of low sensitivity where visual amenity is not the principal reason for them to be present or where the quality of the existing view is poor (e.g. industrial areas or derelict land).

Magnitude of Change

2.32 Each effect on a receptor needs to be assessed in terms of its size or scale, the geographical extent of the area influenced, and its duration and reversibility. The assessment includes consideration of the magnitude of change the Development would exert on the receptor because of:

- the proximity of the Development to the receptor – generally the magnitude of effect reduces with increasing distance as it progressively exerts less influence;
- the extent to which the Development can be seen, and the extent to which landform, woodland, buildings etc. intervene; and
- the visibility of the Development and its resulting effects on character.

2.33 The assessment of the magnitude of change upon visual amenity as a direct result of the Development depends upon several factors including:

- the scale of change in the view with respect to the loss and/or addition of new features;
- the degree of contrast, or integration of/ compatibility with any new features with existing features in the view;
- the duration of the effect (temporary or permanent, intermittent or continuous). Temporary effects are considered to be less significant than longer term or permanent effects. Therefore, magnitude is more likely to be higher if the change is long-term or permanent and low if change is short-term or temporary.
- the distance of the receptor from the source of the effect;
- the angle of view and presence of intervening vegetation or features;
- the dominance of the impact feature in the view; and
- seasonal variation.

2.34 It is generally assumed that the visual effects of the Development would reduce as viewing distance increases. However, the magnitude of visual effects at any given distance will vary according to a range of factors. These include the extent of the new buildings and structures that would be visible; their position in the view; the presence of other conspicuous features; and the extent to which views of the Development would be screened or filtered by intervening landform or by landscape elements such as trees, woodlands, hedgerows, or built structures; and the extent of mitigation planting.

2.35 The assessment assumes that the change would be seen in clear visibility and under appropriate lighting conditions and considers:

- the attributes of the landscape where the Development would be sited (i.e. the scale and character of the landscape in which it would be viewed; the presence or absence of features; and the scale/enclosure within the field of view);
- the design and siting of the Development itself; and
- the atmospheric conditions prevalent at the time of viewing.

2.36 Criteria used to determine the magnitude of predicted landscape and visual amenity effects range from Negligible to Major and are set out in **Table 3**.

Table 3: Magnitude Criteria

Magnitude of Change	Criteria	
	Landscape Receptor	Visual Receptor
Major	All / most key characteristics / features / elements of the landscape would be affected within a localised area. Limited change in landscape characteristics over an extensive geographical area. The proposal would be completely incompatible or inconsistent with the area and its surroundings.	Extensive change to baseline view and/ or loss of key visual features. Introduction of anomalous and highly prominent or dominant new elements.
Moderate	Some key characteristics/ features/ elements would be affected within a localised area. Limited change in landscape characteristics over a wider area without compromising the overall integrity of the landscape. The proposal would introduce some notable elements which would be inconsistent with the existing character which would affect a limited area of the landscape.	Notable change to baseline view (e.g. partial loss of key visual features). Introduction of prominent, but essentially localised new features or elements.
Minor	Very few key characteristics/ features/ elements would be affected. The proposal would introduce some elements which would affect a very limited number of key characteristics/ features/ elements within a localised area of the landscape.	Minimal change to baseline view (e.g. limited loss of visual features), changes are evident, but not especially prominent and are generally localised.
Negligible	No discernible change to the key characteristics of the landscape character; Could include a minimal degree of change within a highly localised area of the landscape.	Barely perceptible change to baseline view and/ or very brief exposure to view.
No Change	No change to Landscape character.	No change to Visual Amenity.

Significance of Effect

2.37 The two principal criteria determining significance are the sensitivity of the receptor to change as a result of the Development, and the magnitude of the impact or effect. Both are considered together to determine the significance of the landscape and visual effect, which can be adverse, beneficial or neutral, as shown in Table 4.

Table 4:Significance of Effect Matrix

		Sensitivity to Change		
		High	**Medium**	**Low**
Magnitude of Change	**Major**	Major Adverse / Beneficial	Major Adverse / Beneficial	Moderate Adverse / Beneficial
	Moderate	Major Adverse / Beneficial	Moderate Adverse / Beneficial	Minor Adverse / Beneficial
	Minor	Moderate Adverse / Beneficial	Minor Adverse / Beneficial	Minor Adverse / Beneficial
	Negligible	Negligible	Negligible	Negligible
	No Change	None	None	None

2.38 Adverse effects are considered to be changes that are detrimental in terms of reducing the quality of the landscape resource or a receptor's views, whereas beneficial effects are changes that enhance the quality of the landscape resource or a receptor's views.

2.39 Effects which are assessed as 'moderate' or 'major' are considered to be 'significant' for the purposes of this assessment and are shown in **bold**. Effects which are assessed as 'minor' or 'negligible' are considered to be 'not significant'. Where it is deemed the Development would have no discernible effect on the quality of the landscape or the receptor's views a neutral classification is assigned. A textual description of landscape and visual effects is given in **Table 5**.

Table 5: Description of Significance of Effects

Significance of Effect	Landscape Character	Visual Amenity
Major Adverse	The Proposed Development is at considerable variance with the scale, landform and pattern of the landscape, and/or there is a total or major loss of key characteristics.	The Proposed Development would be visually intrusive and would cause substantial deterioration and / or adverse change in the existing view / general visual amenity of the area.
Moderate Adverse	The Proposed Development is out of proportion and does not fit with the scale, landform and pattern of the landscape, and/or damages quality, with a loss of key characteristic features.	The Proposed Development would be visually intrusive and would cause noticeable deterioration and / or adverse change in the existing view / general visual amenity of the area.
Minor Adverse	The Proposed Development fits within the scale, landform and pattern of the landscape however, there is some loss of quality or characteristic features.	The Proposed Development would cause limited visual intrusion and would cause minor deterioration and/ or adverse change in the existing view / general visual amenity of the area.
Negligible	The Proposed Development has no easily discernible effect on landscape character.	The Proposed Development would cause no easily discernible change to visual amenity and key views.
Minor Beneficial	The Proposed Development would complement the scale, landform and pattern of the landscape, whilst contributing to the existing character.	The Proposed Development would result in minor improvement and/ or positive changes to key views/ visual amenity of the area.
Moderate Beneficial	The Proposed Development would fit in well with the scale, landform and existing pattern of the landscape, and maintain and/or enhance the existing landscape character.	The Proposed Development would create a very noticeable improvement and / or positive change in key views / visual amenity of the area.
Major Beneficial	The Proposed Development would fit in very well with the scale, landform and existing pattern of the landscape, and bring considerable enhancements.	The Proposed Development would create a substantial improvement and enhancement of key views / visual amenity of the area.

Consideration of Cumulative Schemes

2.40 It is also necessary to consider how the baseline could change in the future as a result of other significant planned developments, or committed developments, in the vicinity of the Application Site. Consideration has therefore been given to this and is presented in **Section 6** of the report with commentary on how each viewpoint could be affected.

2.41 The cumulative schemes are detailed in ES report and locations are showed in **Figure 2.1**. As per the scoping report, this study has taken into consideration schemes that are within a 5km radius to the Site, due to the semi-rural nature of the area.

Consultation

2.42 Consideration has also been given in undertaking this assessment to the ES scoping opinion that was provided by ABC, which setted out the methodology for this report. (refer to ABC Ref.OTH/2024/2051 **Section 5.8 Landscape and Visual Impact**).

2.43 As per paragraph 5.8.1, the assessment will include all relevant designations and sensitive landscape features, shown in **Figure 3**.

2.44 As per paragraph 5.8.2, the assessment has been agreed to use to the baseline photography for the Stour Park outline application.

2.45 As per paragraph 5.8.5, the diversion of PRoW AE672 will result to the adjusted location of Viewpoint 6, which will be representative for footpath users.

2.46 As per paragraph 5.8.8, the ZTV and extend of study area has been set to 1km radius, however viewpoints and receptors at a further distance have been considered, such as Kent Downs National Landscape.

2.47 As per paragraph 5.8.9, the report sets out all relevant planning policies **(Section 3)** to the Development and identifies the affected receptors **(Section 4).**

2.48 As per paragraph 5.8.11, this report will provide verified views as close as possible to the baseline photography to ensure appropriate assessment and will set out anticipated effects of Year 15.

2.49 As per paragraph 5.8.13, this report will set out the choice of viewpoints and provide a map with locations **(Paragraph 4.38)**. Additionally, it will detail the focal length of lenses that were used **(Paragraph 2.18)**.

2.50 As per paragraph 5.8.16, this report will set out the interrelationship between landscape, views and the built heritage, which is covered by the cultural heritage assessment **(ES Volume 1, Chapter 10).**

2.51 As per paragraph 5.8.17, this report will illustrate the location of cumulative schemes at each viewpoint that is affected.

2.52 As per paragraph 5.8.19, this report will take into consideration all relevant Public Rights of Way users where applicable. **(Paragraph 4.39)**

3. Landscape and Visual Planning Policy Context

National Planning Policy

National Planning Policy Framework (2024)

3.1 The National Planning Policy Framework (NPPF)[5] sets out the Government's planning policies for England and how these are expected to be applied. It sets out the Government's requirements for the planning system only to the extent that it is relevant, proportionate and necessary to do so. It provides a framework within which local people and their local planning authority can produce their own distinctive local and neighbourhood plans, which reflect the needs and priorities of their communities.

3.2 Section 2 of the NPPF highlights the importance of achieving sustainable development with three overarching objectives including an environmental objective. New development needs "*to protect and enhance our natural, built and historic environment*".

3.3 Section 8, of the NPPF, paragraph 96 highlights the importance of achieving healthy, inclusive and safe places with beautiful buildings. Also paragraph 103 identifies the requirement for "*access to a network of high quality open spaces*".

3.4 Section 12 of the NPPF identifies '*good design*' as a key aspect of sustainable development which should create "*better places in which to live and work*". The guidance sets out six objectives/ principles that planning policies and decisions should ensure that Developments:

- *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*
- *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities)*
- *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience."*

3.5 Paragraph 131 highlights the importance of creating high quality, beautiful and sustainable buildings and places. Good design is a key aspect of sustainable development, to creates better places in which to live and work and helps make development acceptable to communities.

3.6 Paragraph 136 states that trees make an important contribution to the character and quality of urban environments, and can also help mitigate and adapt to climate change.

3.7 Paragraph 137 states that "design quality should be considered throughout the evolution and assessment of individual proposals".

3.8 Section 15 of the NPPF focuses on opportunities for development to enhance the natural environment. Paragraph 187 sets out approaches to promoting the natural environment.

- *"protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan)";*
- *"recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland";*
- *maintaining the character of the undeveloped coast, while improving public access to it where appropriate;*
- *"minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures";*
- *"preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans"; and*
- *"remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate".*

3.9 Within Section 16 Conserving and enhancing the historic environment, the NPPF suggests that the planning system should contribute to and enhance the historic environment by taking into account "the desirability of new development making a positive contribution to local character and distinctiveness" and "opportunities to draw on the contribution made by the historic environment to the character of a place".

Local Planning Policy

3.10 The Development is situated within the planning jurisdiction and administrative boundary of Kent County Council and Ashford Borough Council.

Ashford Local Plan

3.11 Ashford Borough Council's Local Plan. The Ashford Local plan 2030 was adopted on 2019 and form the main statutory development plan for the borough. The relevant policies to this report are listed below

3.12 Policy SP1 - Strategic Objectives
To deliver the vision of Ashford's borough council, policy SP1 identifies several strategic objectives, that form the basis of the Local Plan and provide the core principles for planning applications.

3.13 Policy ENV2 - The Ashford Green Corridor
The policy's objective is to protect and enhance Ashford's Green Corridor. The policy states that "Development proposals on land adjoining the Green Corridor shall provide suitable access and links to the existing movement networks of the adjoining Green Corridor wherever possible. They must not cause significant harm to any of the key features and functions, and should make a positive contribution to the Green Corridor in respect of its environment, biodiversity, visual amenity, movement networks or functioning and its setting.

Development proposals must take into consideration the appraisals, projects and management recommendations set out for the specific areas in the Ashford Green Corridor Action Plan, including the identified proposed extension areas to the designation."

3.14 3.14 Policy ENV3a - Landscape Character and Design
The policy states that "All proposals for development in the borough shall demonstrate particular regard to the following landscape characteristics, proportionately, according to the landscape significance of the site:
a) Landform, topography and natural patterns of drainage;
b) The pattern and composition of trees and woodlands;
c) The type and composition of wildlife habitats;
d) The pattern and composition of field boundaries;
e) The pattern and distribution of settlements, roads and footpaths;
f) The presence and pattern of historic landscape features;
g) The setting, scale, layout, design and detailing of vernacular buildings and other traditional man made features;
h) Any relevant guidance given in the Landscape Character SPD[6] and Dark Skies SPD[7];
i) Existing features that are important to and contribute to the definition of the local landscape character shall be retained and incorporated into the Development; and,
j) Any non-designated, locally-identified, significant landscape features justified in a Parish Plan or equivalent document.

3.15 Policy ENV4 - Light Pollution and Promoting Dark Skies. The policy states that "Proposals will be permitted provided that the lighting proposed is: the minimum appropriate for its purpose; is designed such that lighting is directed downwards,

5 Ministry of Housing (December 2024). Communities and Local Government, National Planning Policy Framework.

6 Landscape Character Supplementary Planning Document Supplementary Planning Guidance (SPD) (2011). Available online: https://www.ashford.gov.uk/media/fsul3nrk/landscapespd_adopted_april_2011-use.pdf

7 Dark Skies (SPD) (2014). Accessed online: https://www.ashford.gov.uk/media/fsul3nrk/landscapespd_adopted_april_2011-use.pdf

with a beam angle below 70 degrees and; that no significant adverse effects individually or cumulatively will result to the character of the area, the residential amenity of local residents, the safety of vehicle users and pedestrians or the diurnal/ seasonal rhythms of the Borough's biodiversity assets.

Kent Downs National Landscape

3.16 Whilst the scheme sits outside of the Kent Downs National Landscape boundary, it is still relevant to take into consideration policies from the Kent Downs National Landscape Management Plan, due to the proximity of the Development. The relevant policies are listed below:

3.17 SD1 - Ensure that policies, plans, projects and net gain investments affecting the Kent Downs National Landscape take a landscape led approach are long term, framed by the Sustainable Development Goals appropriate to the Kent Downs, cross cutting and recurrent themes, the vision, aims and principles of the AONB Management Plan.

3.18 SD2 - The local character, qualities, distinctiveness and natural resources of the Kent Downs National Landscape will be conserved and enhanced in the design, scale, siting, landscaping and materials of new development, redevelopment and infrastructure and will be pursued through the application of appropriate design guidance and position statements.

3.19 SD3 - Ensure that development and changes to land use and land management cumulatively conserve and enhance the character and qualities of the Kent Downs National Landscape rather than detracting from it.

3.20 SD7 - New projects, proposals and programmes shall conserve and enhance tranquillity and where possible dark night skies.

3.21 SD8 - Ensure proposals, projects and programmes do not negatively impact on the distinctive landform, landscape character, special characteristics and qualities, the setting and views to and from the Kent Downs National Landscape.

3.22 SD10 - Positive measures to mitigate the negative impact of the infrastructure and growth on the natural beauty and amenity of the National Landscape will be supported.

3.23 SD11 -Major development should avoid the Kent Downs National Landscape in line with NPPF guidance. Where it is decided that development will take place that will have a negative impact on the landscape character, characteristics and qualities of the Kent Downs National Landscape or its setting, mitigation and or compensatory measures appropriate to the national Kent Downs Area of Outstanding Natural Beauty Draft Management Plan 2021-202634importance of the Kent Downs landscape will be identified, pursued, implemented and maintained. The removal or mitigation of identified landscape detractors will be pursued.

3.24 SD12 - Transport and infrastructure schemes and growth areas are expected to avoid the Kent Downs National Landscape. Unavoidable developments will be expected to fit unobtrusively into the landscape, respect landscape character, be mitigated by sympathetic landscape, buffering, land bridges and design measures and provide compensatory measure through benefits to natural beauty elsewhere in the National Landscape.

3.25 SD13 - A strategic, landscape led approach to green infrastructure and net gain investments is taken to ensure the recovery, conservation and enhancement of the special characteristics and qualities of the Kent Downs National Landscape and its setting. The Kent Downs National Landscape takes a key role in accommodating net gain investments derived from growth elsewhere where the intended gain cannot be delivered locally.

4. Landscape and Visual Baseline

Existing Environment

Topography and drainage

4.1 The analysis of the terrain of the Application Site and study area is illustrated on **Figure 2**.

4.2 The Application Site has a subtle undulating formation which slopes gently up from the north to the south, with a variance of approximately 8m. The Site sits at approximately 60m AOD.

4.3 The extents of the study area also include a sloped formation. The ground gently rises from the east towards the north west. Ashford sits within the lowest area (approximately 6m AOD) and the ground rises towards the Kent Downs National Landscape to the north west, reaching approximately 180m AOD.

4.4 A small number of land drains are located in the lower lying areas of the site. The Aylesford Stream is located to the north of the neighbouring A2070 and sits outside of the site boundary.

Land use, land cover

4.5 The Application Site has historically been part of standing agricultural land. Its land use has been eroded over time with the urban expansion of Willesborough which has been adjoining Ashford.

4.6 The immediate surrounding area comprises the urban development at the edge of Ashford and rural agricultural fields towards Mersham village.

Trees, woodland, hedgerows & vegetation

4.7 The Application Site has limited existing vegetation. The immediate surrounding land includes sporadic lengths of trees and shrubs that have established along land drainage channels. The most notable existing group of vegetation adjacent to the Site is the mature trees enclosing the church of St. Mary's Church and a linear belt that runs from the corner of the church up to the A2070 road. Around the periphery of the site there are a few boundary hedgerows which vary in maturity and condition.

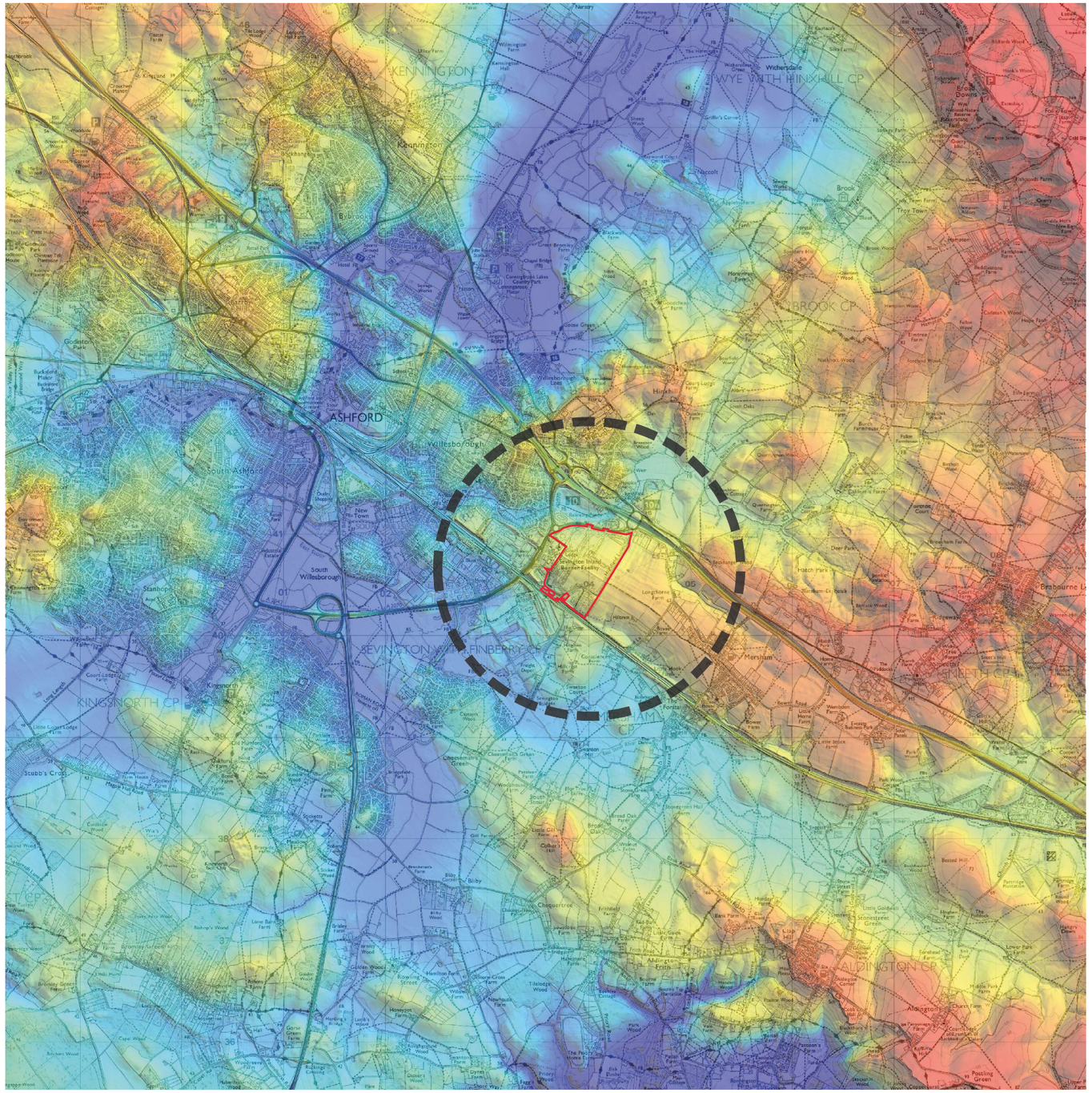

Figure 2: Terrain Analysis

Settlements

4.8 Most settlements in proximity to the Application Site are located west of the Application Site and sit within the urban fringe of Ashford and Willesborough. Additionally, Mersham village is located east of the Application Site, at the edge of the study area.

4.9 Willesborough acts as an urban/industrial extension of Ashford and is located approximately 500m west of the Application Site. The settlement is enclosed by A2070 and M20 to its east, which forms a substantial boundary from the Application Site. Willesborough contains several designated features, such as PRoW, listed buildings, a schedule monument and Local Nature Reserves.

4.10 Willesborough also extents north of the M20 and north of the Application Site, creating a separate settlement at a 500m distance. This settlement is characterised by its conservation area that includes multiple listed buildings and the William Harvey hospital, that sits at the northern edge of the study area.

4.11 Mersham village is another settlement that sits at the edge of the study area and is located east of the Application Site at an approximate distance of 1km. Mersham includes a conservation area that contains a few listed buildings and has good connections with the Site through a PRoW network and Kingsford street.

4.12 Apart from the above settlements, there are some residential properties that are spread within the study area. Several properties adjacent to the southwest boundary of the Application Site are designated as listed buildings and are located in proximity - 50-100m from the Application Site. Finally, there are a few scattered dwellings along rural roads, mainly on Kingsford Street and Cheeseman's Green Lane.

Communications

4.13 Transport corridors such as M20, A2070 and Southeastern Railway line dominate the landscape within the study area. These form important transport connections, linking Sevington with Folkstone to the south-east and Maidstone to the north-west, whilst connecting with surrounding small towns and villages.

4.14 The Channel Tunnel Rail Link (CTRL) (High Speed 1) is located to the south of the Application Site.

4.15 The Application Site and surrounding area is served by an extensive network of Public Rights of Way (PRoW). Further details are provided below.

Designations and Landscape Features

4.16 Designations and landscape features are illustrated on **Figure 3**. The following designations have been taken from MAGIC maps and Ashford Borough Council interactive maps.

Sites of Special Scientific Interest (SSSI)

4.17 There are no Sites of Special Scientific Interest (SSSI) located within the Application boundary, however the Hatch Park SSSI is located approximately 480m east of the Application Site. For further details of SSSI's, refer to ES Volume 1: Chapter 11 (Ecology and Biodiversity).

Register Parks and Gardens

4.18 There are no Registered Parks and Gardens within the Application Site, however there is one located within the study area. Hatch Park, Grade II listed Registered Park and Gardens is located approximately 480m east of the Site. For further details of Registered Parks and Gardens, refer to ES Volume 1: Chapter 10 (Cultural Heritage).

Local Nature Reserve

4.19 Ashford Green Corridors, Local Nature Reserve is located to the west of the Application Site. This is a series of green corridors which extend from the west Application Site boundary to beyond the extent of the study area.

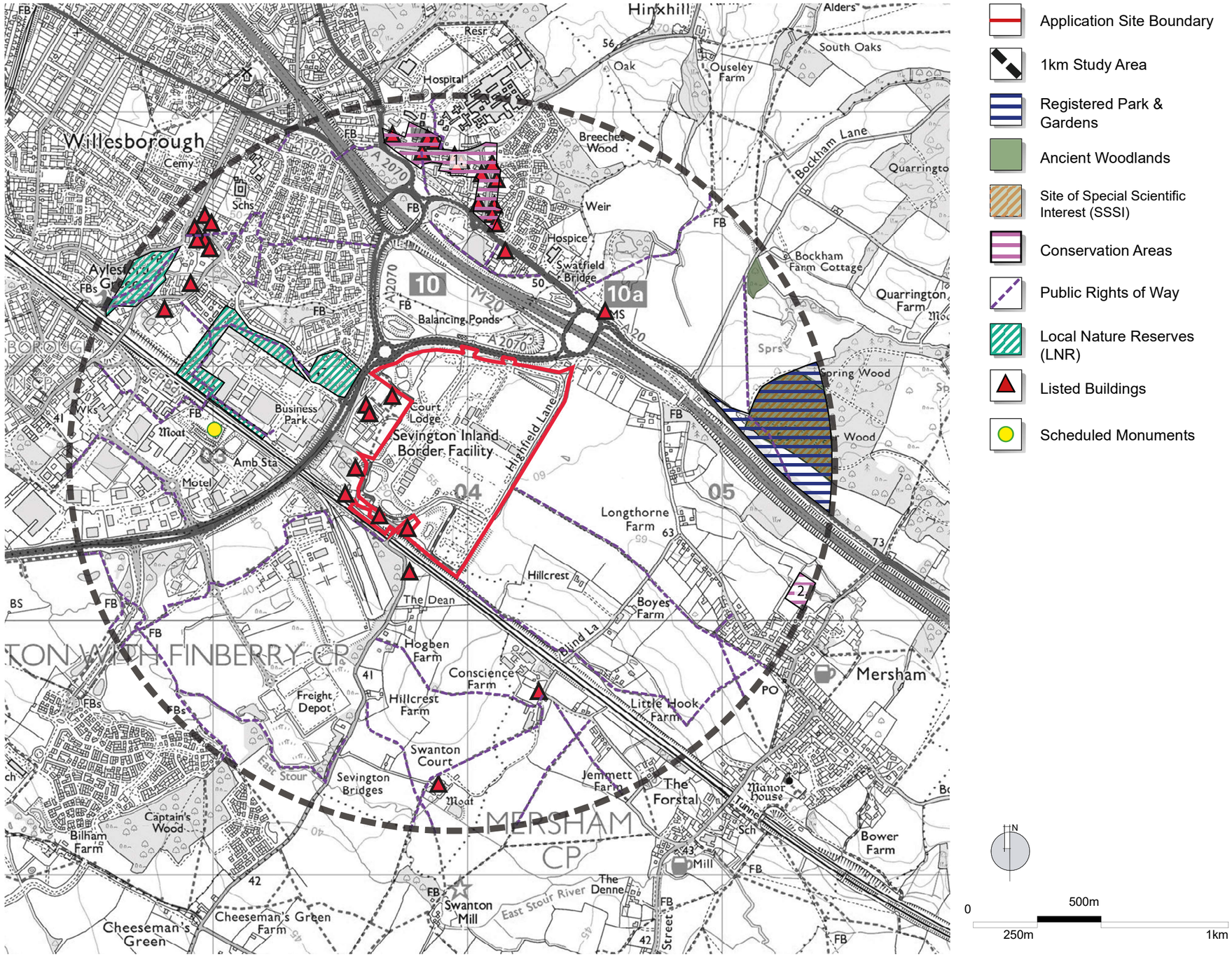

Figure 3: Designations and Landscape Features

Listed Buildings

4.20 There are no Listed Buildings within the Application Site. There are a number of Listed Buildings located within the study area. Below are the listed buildings within 100m of the Application Site:

- Grade I listed Church of St Mary, approximately 20m west of the Site boundary, on Church road.
- Grade II listed Court Lodge, approximately 100m west of the Site boundary, on Church road.
- Grade II listed Barn, approximately 100m west of the Site boundary, on Church road.
- Grade II listed Ashdown Cottage, approximately 20m south-west of the Site boundary, on Church road.
- Grade II listed Orchard Cottage, approximately 20m south-west of the Site boundary, on Church road.
- Grade II listed Maytrees Cottage, approximately 20m south-west of the Site boundary, on Church road.
- Grade II listed Bridge Cottage, approximately 20m south of the Site boundary, on Church road.
- Grade II listed Imber, approximately 100m south-west of the Site boundary, on Cheeseman's Green Lane.

4.21 For further details of Listed Buildings, refer to ES Volume 1: Chapter 10 (Cultural Heritage).

Scheduled Monuments

4.22 There are no Scheduled Monuments within the Application Site. The closest Scheduled Monument is a moated site and associated garden earthworks monument, located approximately 380m west of the Site. For further details of Scheduled Monuments, refer to ES Volume 1: Chapter 10 (Cultural Heritage).

Public Right of Way (PRoW) and Long Distance Trails

4.23 The closest public bridleway to the Site (AE672) connects with Church road to the south west and directs along the western boundary, connecting the local properties and leading to Bad Munstereifel road. Additionally, a network of public bridleways (AE673 and AE672) and footpaths (AE639 and AE340) surrounds the site to the south,west and east of the development, connecting with the wider network of public footpaths which leads to Mersham to the east and Willesborough to the west. There are additional public paths within the study area that increase connectivity with the surrounding settlements, such as AE401, AE138, AE639 and AU53A. Receptors of the footpaths and bridleway users are setted out in paragraph 4.39.

4.24 Additionally, approximately 5.5km north of the Application Site the North Downs Way crosses through the Kent Downs National Landscape. This long distance trail connects Dover, Kent towards Farnham in Surrey and covers 153 miles.

Conservation Areas

4.25 There are no Conservation Areas located within the Application Site boundary, however there is one located within the study area: Ashford - Lacton Green Conservation Area, located approximately 450m north of the Site.

Landscape Character Baseline

National Character

4.26 The National Character Area (NCA) profiles produced by Natural England identify one NCA within the entirety of the study area, namely NCA 120 'Wealden Greensand'. Key characteristics of relevance to the study area include:

- "A long, narrow belt of Greensand, typified by scarp-and-dip slope topography."
- "There are extensive areas of ancient mixed woodland of hazel, oak and birch, with some areas having been converted to sweet chestnut coppice in past centuries."
- "Semi-natural habitats include: remnant lowland heathland, wetlands associated with the River Avon and unimproved acid grasslands found in commons, parkland heathland and other unimproved pasture areas."
- "Fields are predominantly small or medium, in irregular patterns derived from medieval enclosure."
- "Agricultural land comprises a mosaic of mixed farming."
- "The rural settlement pattern is a mixture of dispersed farmsteads, hamlets and some nucleated villages".

Regional Character

4.27 The Landscape Assessment of Kent (October 2004) sets out the regional Landscape characters in and around the study area. The Site falls into the "Mersham Farmlands" character area and is adjacent to "Upper Stour Valley", "Ashford" and "Brabourne Lees Mixed Farmlands" character areas.

4.28 Mersham Farmlands character area is defined by the following characteristics:

- A small character area on the Hythe Beds south-east of Ashford in an undulating farmed landscape.
- The landscape is one of open arable fields with small-scale pastoral farming with small copses and old gappy hedgerows.
- Suburban housing wraps around the village centre at Mersham.
- The remaining pasture and hedgerow are vulnerable both and to potential removal for arable usual.
- The character area is gradually being enclosed by development on three sides.

4.29 Upper Stour Valley is located south of the Site and is defined by the following characteristics:

- A flat generally open landscape of the Great Stour and East Stour rivers, that land use is on of mixed farming with enclosing views in the middle distance.
- Clumps of field trees and copses provide interest as does the irregular presence of riparian vegetation along the river.
- Hedgerows are relatively infrequent and often gappy.
- The vegetation loss contributes to a loss of visual unity and is eroding the traditional wildlife corridors along the river and between the fields.
- Fingers of pasture and neglected farmland extend right up the A2042 to the town centre. The railway line cuts across to the north of the area, rarely impinging on the landscape.

4.30 Ashford's regional character is defined by the following characteristics:

- An urban setting with mostly residential and industrial land use.
- It contains residential properties that are forming the townscape which appears to be evolving with the years as there are signs of variations of architectural styles.
- It is characterised by its historic conservation area and the associated listed buildings.
- A network of nature reserves runs across the character, acting as a green corridor.

4.31 Brabourne Lees Mixed Farmland is the regional character north of the Site and it is defined by the following characteristics:

- Gently undulating mixed farmlands extend from the outskirts of the town at Willesborough to Lilyvale, with the character being bounded to the south by M20.
- Topography is varied from low and flatter lands to undulating landscapes. Woodlands are locally characteristic of the landscape notably around Hatch Park.
- An important element of the character area is the remnants of a rich valley bog that adjoins Willesborough Lees (SNCI).
- To the east Brabourne Lees sits on a rise above the surrounding countryside. To the north-west the landscape is quite open with many hedges removed. The village itself sits up quite noticeably in the landscape

Kent Downs National Landscape

4.32 The adopted AONB Management Plan for 2021-2026 provides the following vision for the National Landscape: “In 2041… the qualities and distinctive features of the Kent Downs National Landscape, the dramatic south-facing scarp, far-reaching views, secluded dry valleys, network of tiny lanes, isolated farmsteads, churches and oasts, orchards, dramatic cliffs, the ancient woodlands and delicate chalk grassland along with the ancient, remote and tranquil qualities, are valued, secured and strengthened.”

4.33 The AONB Management Plan identifies the following special characteristics:

- Dramatic landform and views; a distinctive landscape character
- Biodiversity-rich habitats.
- Farmed landscape.
- Woodland and trees.
- A rich legacy of historic and cultural heritage.
- The heritage coasts.
- Geology and natural resources.
- Tranquillity and remoteness.

Local Character

Site Character Analysis

4.34 For the purposes of this assessment, a series of Landscape Character Areas have been identified with specific regard to the geographical extent of the study area and the context of the Application Site. These areas are distilled from a combination of desktop research using the various existing landscape character assessments and experiential field work influenced by factors such as topography, land use and visibility of the Application Site. As such, 5 study area level LCAs have been identified and are described in **Table 6** and illustrated on **Figure 4**.

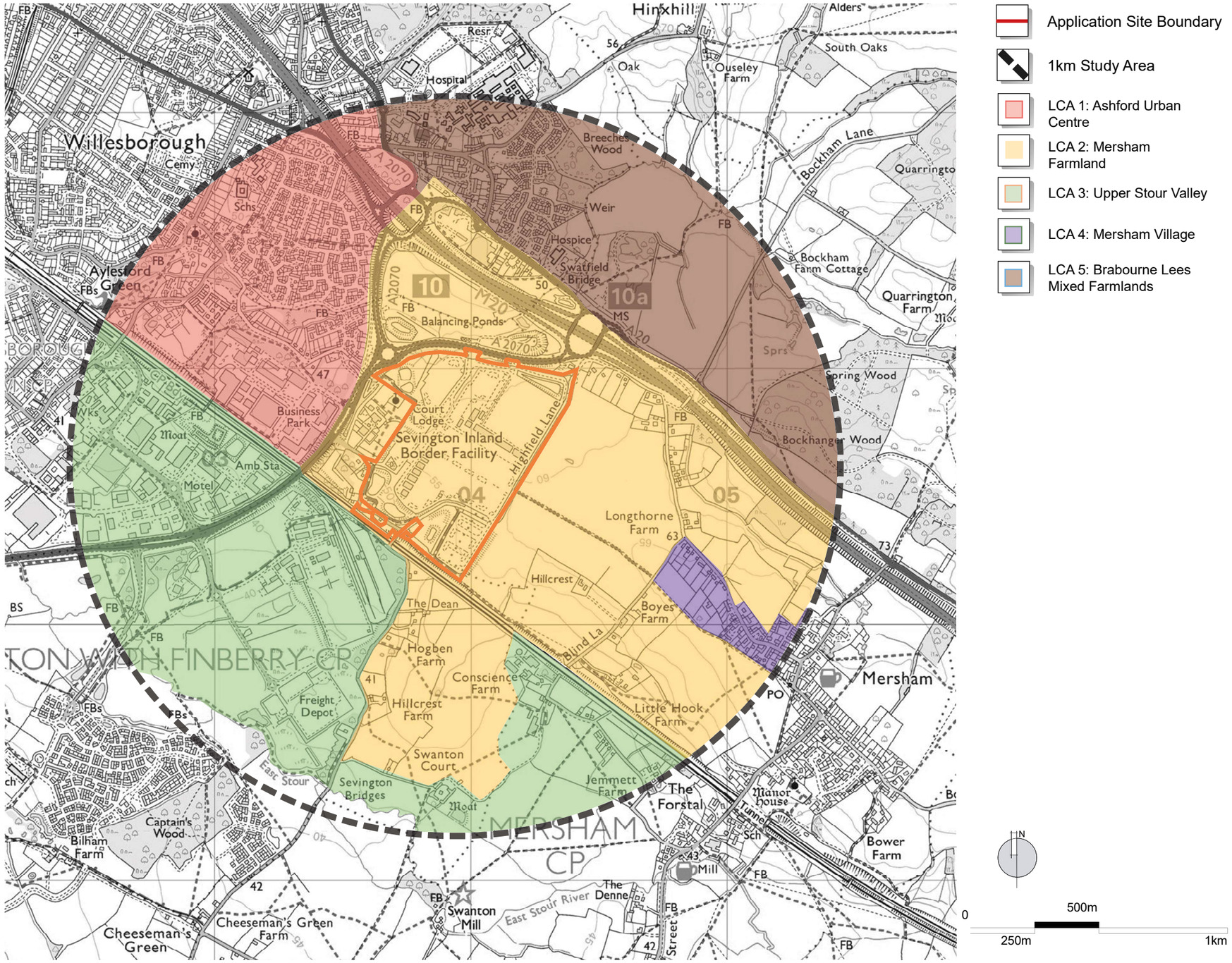

Figure 4: Landscape Character Areas

Summary of Landscape Baseline

4.35 The assessment has been informed at a local level by the Ashford Local Development Framework Landscape Character Study (2005) and subsequently at a county level by the Landscape Assessment of Kent (2004). There are five local landscape character areas covering the study area, four of which are covered by the Kent Landscape Character Assessment.

4.36 The Application Site sits within a gently rolling lowland landscape of agricultural fields at the eastern edge of Willesborough. The land then rises as you travel towards the east. The Site contains limited vegetation, but the adjacent land includes a few boundary hedgerows and sporadic existing vegetation. The urban fringe of southeast Ashford forms the backdrop towards this part of the study area and defines most of the character at the west of the Site.

4.37 The Application Site is well connected within the region due to the adjacent highways/motorways (M20, A20, A2070). There is also good connectivity at a local level with a PRoW network extending around the Site.

4.38 There are various designated heritage assets within the study area, including Grade II, Grade II* and Grade I listed buildings. Additionally, the study area comprises Schedule Monuments, Conservation Areas and Local Nature Reserves. The vast majority of the designated assets are located within the Willesborough urban fringe, east and north from the Site.

Table 6: Landscape Character Areas

Landscape Character Area	Definition	Sensitivity
LCA 1 Ashford Urban Centre	The Ashford Urban Centre local character area is mostly comprised by a mix of residential dwellings in an urban setting, covering most of Ashford's centre. This LCA covers the area north west of the Application Site and focuses on the urban area of Willesborough. The eastern edge of the LCA, which extends to the western site boundary, is defined by the A2070 and borders LCA 5 to the north and LCA 3 to the south. The CTRL forms the south western boundary and separates the residential area with a more industrial set out in South Willesborough. The majority of the properties within the LCA are modern red brick semi-detached and detached houses, forming a townscape that appears to evolve over the years. The roads network is set out densely, providing good access in and around the area. In terms of designations, the LCA is comprised by several listed building and a Local Nature Reserve that form part of a green corridor. Ashford Urban Centre should be considered of low value as it lacks of designated landscapes and has a weak sense of place with low tranquillity. The LCA is largely undesignated with few distinctive characteristics and therefore it is considered to be a landscape that can tolerate changes	Low
LCA 2 Mersham Farmlands	This LCA covers the entire Application Site and the largest proportion of the study area. Mersham Farmlands is defined by its undulating small scale farmlands and open arable fields. It contains limited vegetation, apart from a few hedgerows that act as field boundaries. The M20 and its junctions define the northern boundary of the LCA, although it is mostly hidden due to its topography and the road being in cutting. The western and eastern boundaries are defined by the residential areas of Ashford and Mersham respectively, while the CTRL is forming most of the southern boundary. The Application Site sits at the western edge of the LCA, where key characteristics are the open arable farms with surrounding hedgerows, a gentle slope of the land and the St. Mary's Church. The local character is showing weak landscape patterns that are mostly interrupted by the transportation corridors and is providing a weak sense of place in terms of sensitivity to change. Additionally, the presence of nearby large-scale infrastructure reduces the susceptibility to change, resulting in a low sensitivity in and around the Application Site.	Low
LCA 3 Upper Stour Valley	This LCA is located at the south part of the study area and borders the southern boundary of the Application Site. The character is defined by a flat and open landscape that is formed by Great and East Stour rivers. Most of the area is comprised by arable fields and improved grassland, but there are some small groups of trees and copse that add interest to the landscape. Not many hedgerows can be found in the area, due to previous removals for agricultural improvements, which have led to reduced visual unity of the landscape. The land adjacent to the Application Site and within the LCA is defined by its northern boundary that runs along the CTRL. The land south of the A2070 has a rather industrial setting with the presence of railway freight terminal, International truck stop, hotel with fast food restaurants, and a retail park. LCA 3 as a whole is considered to be of low landscape value due to its fragmented nature, the dominance of transport and retail infrastructure, resulting to a low sensitivity to change.	Low
LCA 4 Mersham Village	This LCA covers the entire Mersham village, which is a historic settlement of the medieval period and a designated Conservation area. The village extends to the Kingsford Street and Bower Road and contain rather large properties in contrast with its small scale. The village includes a number of listed buildings and various architectural styles. There is not much of vegetation in the LCA, apart from the private gardens and the surrounding fields are mainly farmlands. The Mersham Village local character is considered to be of medium landscape value, because of its distinctive character and the large proportion of designations. The overall sensitivity is considered to be medium.	Medium
LCA 5 Brabourne Lees Mixed Farmlands	This LCA is located east of Ashford, covering the northern part of the study area and extending along M20. The motorway is a dominant feature that has an impact upon the tranquillity of the area, given the presence of the heavy traffic and associated noise. The LCA is defined by its gently undulating mixed farmlands and its topography varies, from lowlands in proximity to Ashford, to higher grounds towards the eastern parts. The LCA has limited urbanised areas such as the Willesborough Lees, a Conservation Area, some relatively new residential developments and a hospital campus, but the majority of the area is not built. The most dominant land cover is farmland and woodland, which include a SSSI and a Registered Park. The large extend of tree cover creates an enclosed landscape with limited views out from its central core. Factoring all the above and the importance of the local designations, the area is considered to have high sensitivity to change.	High

Visual Baseline

4.39 **Figure 5a and 5b** illustrate the Zone of Theoretical Visibility (ZTV) of the Application Site, based on the baseline prior of the Development, with all proposed buildings at 12m high to represent a worst-case scenario. The ZTV is colour coded to assist with the analysis of visibility whereby strong, dark green colouration represents up to 100% of the Development being theoretically visible and pale, light green colouration represents no theoretical visibility of the Development. Intermediate gradation of colour ranging from darker green to lighter green represents a range of theoretical visibility from high to low potential visibility respectively.

4.40 The visual analysis has identified the following principal receptor groups which may be sensitive to visual change due to the Development occurring at the Application Site:

- AE672 PRoW users on the footbridge over the A2070;
- Visitors of St. Mary's Church and adjacent PRoW users;
- Road users and residents along Church Road;
- Road users and residents along Highfield Lane;
- AE401 PRoW users;
- Waterbrook Avenue Road users;
- AE138 PRoW users;
- AE639 PRoW users;
- Residents along Blind Lane;
- Road users and residents on Kingsford Street;
- Residents on Hythe Road;
- AU53A PRoW users;
- Visitors of Kent Downs National Landscape;
- Users of Coldharbour Lane.

4.41 Views which are considered to be representative of the above receptors are described in **Table 7** and locations shown in **Figure 5a and 5b** with images of these existing and proposed views shown from **Figure 6 to Figure 32.**

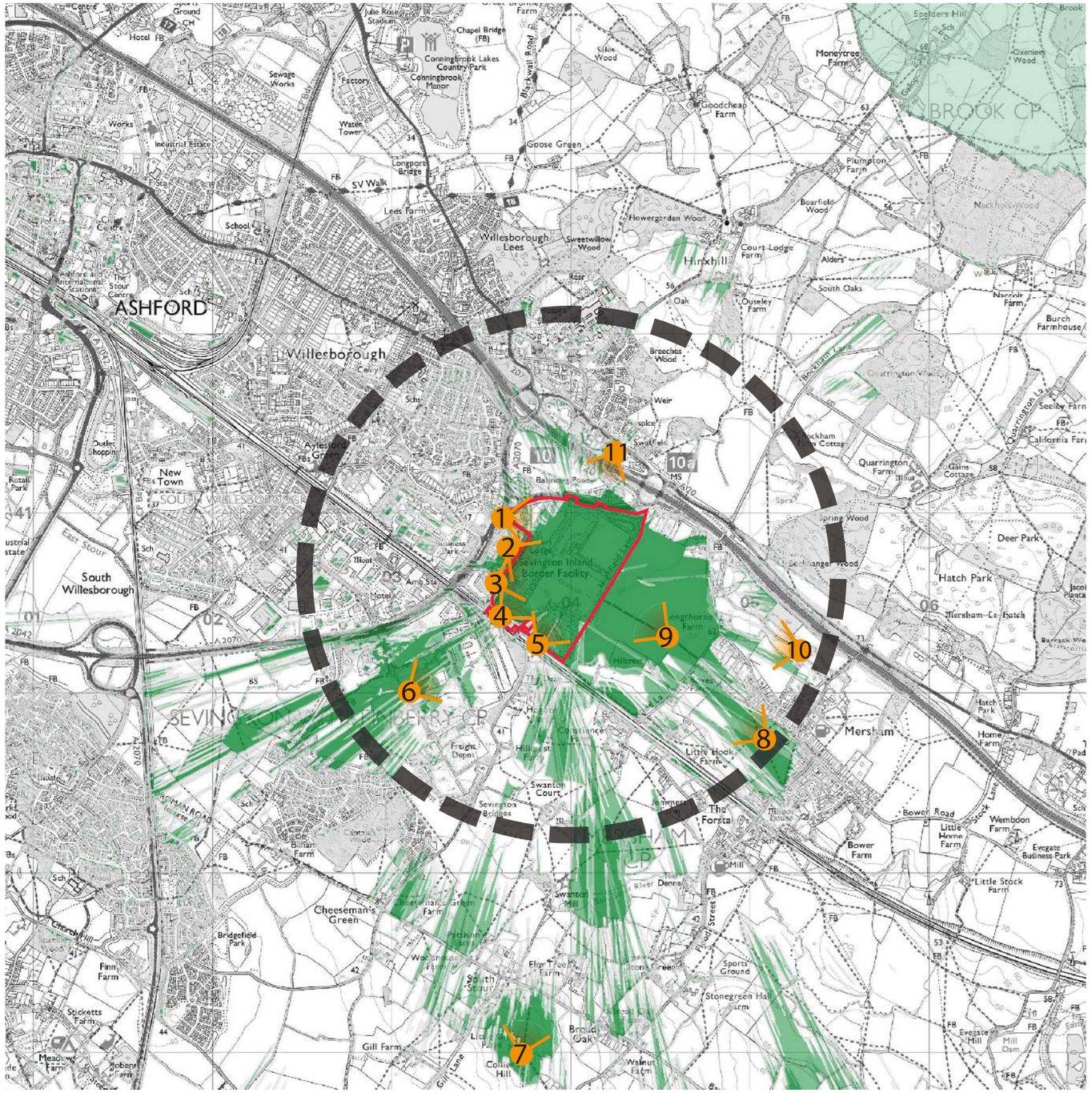

Figure 5a: ZTV and Viewpoint Location Plan

Application Site Boundary

1km Study Area

Potential Viewpoint Location

Key for Theoretical Visibility:

- High potential Visibility
- Low potential visibility
- No Visibility

The Zone of Theoretical Visibility (ZTV) uses a Digital Surface Model (DSM) which is overlain on a 1:25,000 Ordnance Survey base map. The ZTV map indicates the potential area from which visibility of the Proposed Development might be possible. The ZTV map does not account for the likely orientation of a viewer for example when travelling in a vehicle nor does it account for the diminishment of visibility with increased viewing distance caused by the limitations of the human eye and prevailing atmospheric conditions. As such, the ZTV is an over-estimate of the extent of visibility. It is an assessment tool but should not be considered an absolute measure of visibility and does not represent the visual impact.

This ZTV is based on the Proposed Development being 12m high.

N

0 500m

250m 1km