

HEARING SESSION 9 – RETAIL AND MIXED DEVELOPMENT

Matter 2 RMX1(1) Newnham Park

9.11 Would Proposed Change PC/43 suitably address potential effects on the AONB?

9.11.1 No. The Kent Downs AONB Unit is not opposed to the principle of allocating the proposed Newnham Park area for development, but wishes to ensure that development is carried out in a way which is sympathetic to the AONB. The Unit is pleased that the intention to mitigate the impact of development on the AONB and its setting is recognised in Policy RMX1(1) paragraph 5. We also welcome the Council's Proposed Change PC/43 to amend paragraph 11 of the Policy to require the intended landscape assessment to include assessment of the impact of the development on views to and from the Kent Downs AONB.

9.11.2 Unfortunately, the policy and the proposed change do not go far enough to achieve the intentions. We propose further small but clear policy changes which will resolve this and avoid ambiguity, therefore providing certainty for all parties. The following paragraphs explain the changes needed and the reasons for them.

9.11.3 There are two largely separate areas within Newnham Park: the retail area to the south-west and the medical development area covering the majority of the site to the north, south and east. The retail area is situated on a low bluff, so the buildings on it are prominent from vantage points round about. The medical area falls from north to south and also from both east and west (particularly the latter) down to a stream in a valley which splits the site approximately down the middle. The KIMS buildings are up to four storeys high and have been built at the top of the site, north east of the retail area.

9.11.4 The development of the site and its appearance are shown in the photographs in Appendix 1. These provide a context for our comments. 1(a) indicates the layout of the site viewed from the south (Google Earth). 1(b) gives a general view in the direction of Newnham Park from the much-frequented White Horse Wood Country Park in the AONB (located 2.5km a little east of north-east from the north end of the development area). 1(c) gives a telephoto view of Newnham Park from the same position. The two oast houses near the centre of the retail park are clearly visible. These photographs show that the reflective surfaces of roofs at the retail park cause the greatest intrusion from the AONB, and these are made more prominent by their elevation. The KIMS buildings are in the same line of sight and closer to the camera. They are three and four storeys in height, which causes them to rise above the surrounding trees, though their impact has been somewhat mitigated by the use of darker roof surfaces. 1(d) is a view from the north north-west, from the North Downs Way when KIMS was under construction in November 2012. This is a glimpsed telephoto view, when the trees were not in leaf, from close to the point 2.2km from the north edge of Newnham Park, where the footpath comes up from Boxley church. 1(e) is a view north from beside Bearsted Road when KIMS was under construction.

9.11.5 The retail park at Newnham Court is prominent in views from the AONB (see Appendices 1(b) and 1(c)). It is vital that any further development there is kept to a maximum of two storeys. Policy RMX1(1) needs clarification in paragraph 5(iv). There are in

reality two entrances to Newnham Park from Bearsted Road, one into the retail park and the other from the New Cut roundabout to the medical allocation area. It is critical that the option of 3-storey buildings “at the entrance to the site” does not apply to the retail park. Neither should 3-storey structures be built close to the New Cut roundabout entrance: Appendix 1(e) shows that even at the lowest point of the site there is still a clear view to the North Downs, so the setting of the AONB would be at risk. **We therefore request deletion of the words in paragraph 5(iv) “and buildings of up to 3 storeys could be accommodated at the entrance to the site.”**

9.11.6 At the north end of the medical allocation site the KIMS buildings are already visible from the AONB. Additional buildings, further away from the northern tree screen, would be more prominent from the AONB. Views into the site from the North Downs Way to the north and north-west are limited by existing scrub vegetation, but glimpsed views clearly show that that development on the north-east of the medical allocation site would be readily apparent in the setting of the AONB (see e.g. Appendix 1(d)). Development here is also likely to be clearly visible from elsewhere in the AONB. We therefore welcome the Policy in paragraph 5(iii) “The use of the topography in site layout plans to exclude development on the higher, more visually prominent parts of the site.” To avoid dispute about which land is affected by this stipulation, **we request that the Policies Map is amended to mark the area excluded by paragraph 5(iii)**. We would be pleased to assist the Borough Council on this point.

9.11.7 We consider that 4-storey buildings close to the KIMS phase 1 development are unlikely to be feasible without adversely impacting on the setting of the AONB. The proposed change to paragraph 11 (PC/43) to tighten the requirements for landscape assessment provide some reassurance of appropriate protection. However, landscape assessments can vary in quality and **we request the inclusion in the Policy of:**

- **a specific obligation by way of amendment to PC/43 and paragraph 11 to provide photomontages of developments which could affect the setting of the AONB: “submission of a full landscape assessment which includes assessment of the impact of the development on views to and from the Kent Downs AONB, incorporating the use of photomontages”; and**
- **an amendment to paragraph 5(vi) to avoid the use of reflective roofs: “The use of green roofs where practicable and the avoidance of use of reflective materials”.**

Appendix 1: Photographs of Newnham Court

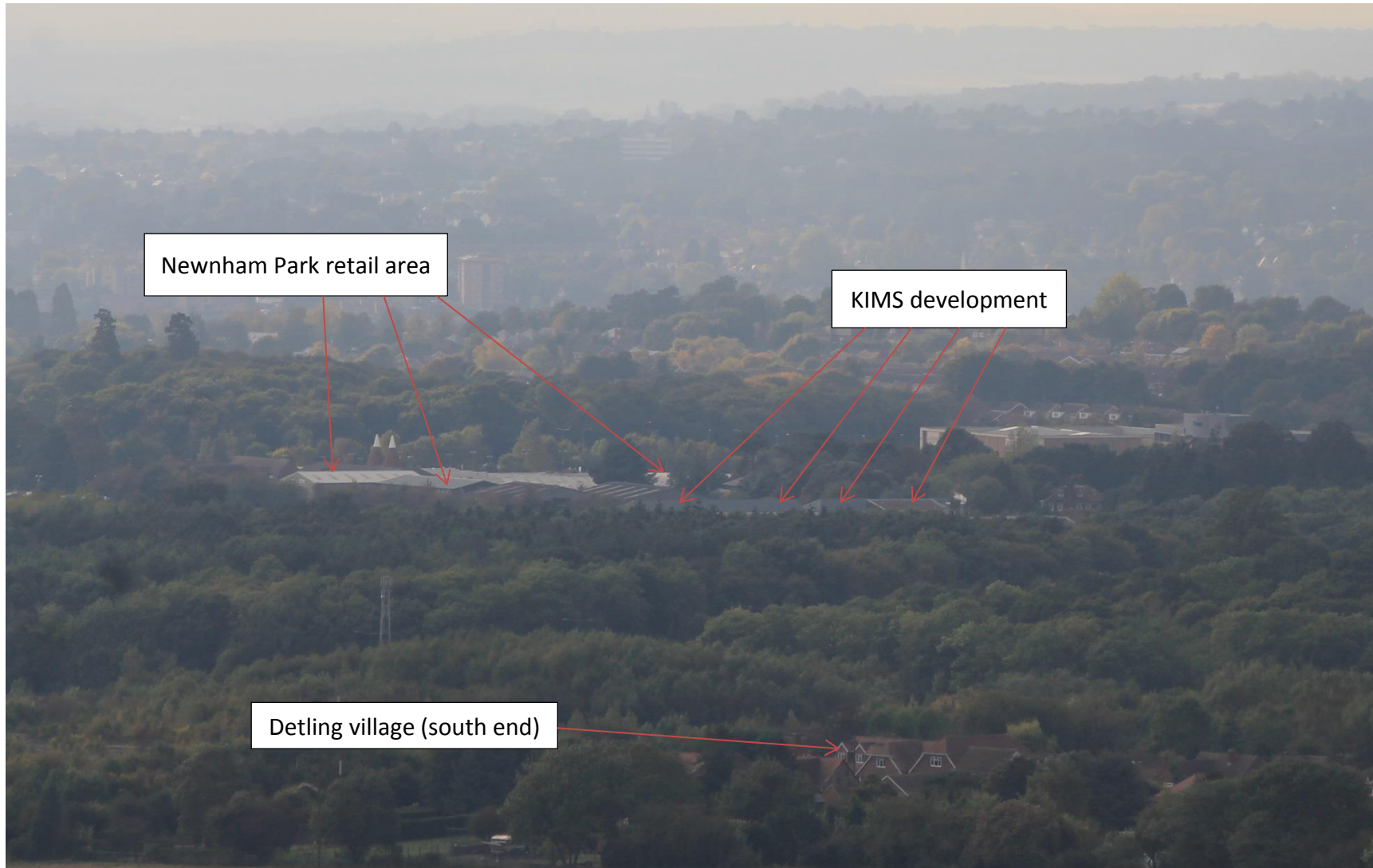
1(a) Aerial view from the south (Google Earth, 14 December 2015)



1(b) Newnham Park from White Horse Wood Country Park, October 2016



1(c) Newnham Park from White Horse Wood Country Park, October 2016 (detail)



1(d) KIMS development under construction in November 2012 from the North Downs Way, from the north north-west



1(e) KIMS development under construction in November 2012, from beside Bearsted Road

