

BREDGAR PARISH COUNCIL



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5th September 2019

Planning Policy Team - Landscape Sensitivity Assessment
Swale Borough Council
Swale House
East Street
Sittingbourne
Kent
ME10 3HT

Re: Landscape Sensitivity Assessment - Comments

Dear sir or madam,

Bredgar Parish Council (BPC) has reviewed the Swale Landscape Sensitivity Assessment that was prepared by LUC for Swale Borough Council in May 2019 and submit the following comments for your review.

BPC reviewed the document with particular attention to the landscape sensitivity assessment areas BR1, BR2 and BR3, taking into consideration their integration within the landscape surrounding them, both inside and outside the AONB.

In summary, BPC has concluded that we strongly support much of the assessment conducted by LUC and many of the findings they reported, but believe that in some cases the landscape sensitivity has been under estimated. We propose that three of the assessments be raised from medium-high to high and one other raised from medium to medium-high (see table). We don't think enough weight was attributed to the setting of the Kent Downs outside of the AONB, or to our submission to the 2017 review (attached), or to the easily recoverable impacts of farming practices over the past forty years.

Based on our review we recommend the following changes to the overall assessment ratings for the Bredgar Areas.

Overall assessment of landscape sensitivity to future change from residential development (2-3 storey housing, over 2ha)		
Area	Current Assessment	Proposed Assessment
BR1	M	M-H
BR2	M-H	H
BR3	M-H	H
Overall assessment of landscape sensitivity to future change from employment development (Use Class B light industrial)		
Area	Current Assessment	Proposed Assessment
BR1	M-H	H
BR2	H	H
BR3	H	H

The observations which form the basis of our conclusion above are detailed below.

The LUC assessment correctly identified many important characteristics of Bredgar which we list below:

- Its location on the dip slope of the Kent Downs AONB.
- A linear development along the historical drove line.
- The need to maintain the sense of Bredgar as a distinct rural settlement that nestles comfortably within the AONB.
- A rural landscape with the agriculture present now being predominantly arable fields, orchards and horticulture.
- An undeveloped skyline which is not visually prominent (apart from a small handful of pylons, the 14th Century Church) in external views.
- The tranquility of the village and the AONB.
- An area with a good experience of 'dark skies' that is an important shared characteristic with the rest of the of the AONB and adjacent land.
- The historical importance of the Bredgar Conservation Area and surviving orchards.
- Many Listed Buildings located throughout the Parish.
- The Public Rights of Way within Bredgar are all highly valued and well used, with good public access throughout and linking into the wider AONB.
- The divisive nature of the M2 on integration of settlements either side.
- Recognising that the M2 being in a cutting reduces its negative influence on the tranquility and and light pollution in the area.
- A high sensitivity to taller development.

In addition to these points BPC consider that:

- LUC did not give sufficient weight to the setting of the AONB. Although the M2 is the boundary for the AONB, it is not a natural edge of the Kent Downs and therefore development immediately adjacent to the north side of the M2 will cause significant harm to the setting of the AONB.
- LUC did not value highly enough the relationship between Bredgar and its placement within the landscapes and views identified in our submission to the 2017 review (attached). The submission identified ten

valued landscape areas and most importantly the need for an AONB 'buffer zone'.

- Farming practices over the past forty years have been allowed to damage the landscape on all sides of Bredgar and we believe that the sensitivity assessment does not take into account how some of this could be easily recovered. Such as, by replanting hedgerows along field edges beside all rural roads. We assert that landscape damaged by destructive farming practices of the last forty years, which is mostly easily reparable, should be assessed in terms of what it would be like after restoration rather than in its present state.

BPC strongly support the guidance of LUC to:

- Conserve and enhance the Kent Downs AONB.
- To establish a clear countryside gap to Bredgar. Including the need to avoid a visual or physical relationship to the Dove's Croft settlement.
- That any new development should follow a landscape-led approach as described, including green infrastructure.
- Maintain and enhance the well-integrated edges of Bredgar into the AONB, so that any new development is not generally visible from the surrounding rural landscape. With the linear development form retained where possible, avoiding developments extending onto Bexon Lane and keeping the sense that Silver Street and Swanton Street are maintained as distinct rural settlements.
- Retention of rural qualities in the designated Rural Lanes.
- Preservation of the tranquility and 'dark skies' of the AONB.
- Further enhancement and addition where possible of more PRoW.
- The importance of vegetation along lanes on the skyline for external views.
- Ensuring any new development is sensitive to local character and context in terms of building styles, materials, scale and sensitive lighting.
- Restoration of historical features, such as hedgerows and orchards and accessible green and blue spaces and routes.

BPC would add the following important considerations:

- Scale. The recognition of sensitivity to scale in any proposed development is extremely important. There are only 270 properties in the whole parish of Bredgar (source Census 2001 and 2011). Any housing development within the village needs to be proportionate, with growth over time that is integrated with the existing village, enhancing the community and local facilities. The alternative, a rapid and dramatic change, would not provide adequate time for sensitive protection of the landscape, a landscape that has evolved slowly and organically over the past thousand years of habitation.
- Protecting Bredgar from future flash flooding such as occurred in May 2018. Recent farming practices have not benefited the landscape and recovery would be assisted by replanting of hedgerows alongside roads. Such actions would help enhance the landscape, slow soil erosion, reduce blockage of drainage systems and the risk of flooding during heavy rainfall.
- The importance of maintaining and enhancing the landscape for rural bio-diversity around and within Bredgar, that already supports regular sightings of barn owl, little owl, bats, sparrowhawk, kestrel, buzzard, grey heron, house

sparrows, starlings, skylark, hedgehogs and badgers.

Taking into account the points above we make the following recommendations for the Bredgar Areas for your consideration.

BR1 – North of M2.

Keeping the village identity as a distinct rural settlement is important and requires maintenance of a significant countryside gap within BR1. Whilst not in the AONB this area is an important and integral part of the setting of the Kent Downs. Development in BR1 with lighting and noise will cause significant harm to the tranquility, 'dark skies' and external views of the AONB. Therefore establishing a significant buffer zone to the AONB is very important along the whole length of the M2 on the northern side.

For these reasons BPC recommend that area BR1 is rated High Sensitivity for employment development and Medium-High Sensitivity for housing development.

BR2 – South of M2, east of Primrose Lane

This area is clearly unsuitable for class B light industrial and BPC fully endorse the High Sensitivity assessment for employment land development. Housing development in this area is very likely to be detrimental to the AONB.

For these reasons BPC recommend that area BR2 is rated High Sensitivity for employment development and High Sensitivity for housing development.

BR3 South of M2, west of Primrose Lane

This area is clearly unsuitable for class B light industrial and BPC fully endorse the High Sensitivity assessment for employment land development. Housing development in this area is very likely to be detrimental to the AONB.

For these reasons BPC recommend that area BR2 is rated High Sensitivity for employment development and High Sensitivity for housing development.

BPC are very committed to engage fully and positively with everyone as this process moves forward into later stages.

Yours faithfully,

Mrs Teresa Hudson
Clerk - Bredgar Parish Council