



To all Members of the Environment and Transport
Cabinet Committee

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Ask for: Ann Hunter
Date: 9 September 2020

Dear Member

**ENVIRONMENT & TRANSPORT CABINET COMMITTEE - TUESDAY, 15 SEPTEMBER
2020**

I am now able to enclose, for consideration at next Tuesday's meeting of the Environment & Transport Cabinet Committee, the following paper, which was unavailable when the agenda was printed.

Agenda Item No

23

**Review of the Kent Downs Area of Outstanding Natural Beauty (AONB)
Management Plan - proposed consultation response (Pages 1 - 52)**

Yours sincerely

A handwritten signature in black ink, appearing to read 'B. Watts', is written over a faint, larger signature.

Benjamin Watts
General Counsel

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Kent Downs Area of Outstanding Natural Beauty
Draft Management Plan

Consultation Questionnaire

The Kent Downs Area of Outstanding Natural Beauty (AONB) Unit are seeking your views on the Kent Downs AONB Draft Management Plan 2020 – 2025. Kent County Council (KCC) is hosting this consultation on their behalf.

What information do you need before completing the questionnaire?

We recommend that you read the **Draft Management Plan** (or sections relevant to your interests) and accompanying **Draft Landscape Character Assessment** (or sections relevant to your interests) before filling in this questionnaire. The Environment Report and Sustainability Assessment and Equality Impact Assessment are also available. All consultation material is available on KCC's website kent.gov.uk/kentdownsaonb or in hard copy on request.

We recognise that the AONB Management Plan and accompanying Landscape Character Assessment are broad in the subjects and geography they cover so please do not feel obliged to answer all of the questions. We welcome your response to any or all of the matters they cover.

The Draft Plan was prepared before the Covid-19 pandemic and it will be vital we consider how the Management Plan responds to the crisis. This questionnaire provides an opportunity for you to tell us any key considerations you feel we should take into account.

This questionnaire can be completed on our website. Alternatively, you can fill in this Word version and return it via email to mail@kentdowns.org.uk or by post to Kent Downs AONB Unit, West Barn, Penstock Hall Farm, Canterbury Road, East Brabourne, Ashford, Kent TN25 5LL.

Please ensure your response reaches us by midnight 7th September 2020.

Alternative Formats: If you need this questionnaire or any of the consultation documents in an alternative format, please email alternativeformats@kent.gov.uk or call 03000 421553 (text relay service number: 18001 03000 421553). This number goes to an answering machine which is monitored during office hours.

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Section 1 – About You

Q1. Are you responding on behalf of ...?

Please select the option from the list below that most closely represents how you will be responding to this consultation.

Select **one** option only.

<input type="checkbox"/>	Yourself as an individual
<input type="checkbox"/>	Yourself in your professional capacity
<input type="checkbox"/>	A representative of a local community group or residents' association
<input type="checkbox"/>	On behalf of a Parish / Town / Borough / District Council in an official capacity
<input type="checkbox"/>	A Parish / District / County Councillor
<input type="checkbox"/>	An educational establishment, such as a school or college
<input type="checkbox"/>	On behalf of a business
<input type="checkbox"/>	On behalf of a charity, voluntary or community sector organisation (VCS)
<input checked="" type="checkbox"/>	Other

If 'Other', please specify: On behalf of Kent County Council in an official capacity

Q1a. If you are responding in your professional capacity, please tell us what it is:

Q1b. If you are responding on behalf of an organisation (community group, resident association, council, educational establishment, business or any other organisation), please tell us the name of the organisation here:

Kent County Council

Q2. Please tell us the first five characters of your postcode:

Please do not reveal your whole postcode. We use this to help us to analyse our data. It will not be used to identify who you are.

ME14 1

Section 2 – Kent Downs AONB Draft Management Plan

The Draft Management Plan is formed of 12 sections. You can provide feedback on all or as many of the sections as you like. If you would rather not provide feedback on any section, just move on to the next set of questions.

1. The Kent Downs AONB [Page 4](#)
2. The Management of the Kent Downs AONB [Page 7](#)
3. Sustainable Development [Page 9](#)
4. Landform and Landscape Character [Page 13](#)
5. Biodiversity [Page 16](#)
6. Farmed Landscape [Page 19](#)
7. Woodlands and Trees [Page 22](#)
8. Historic and Cultural Heritage [Page 25](#)
9. Heritage Coast [Page 28](#)
10. Geology and Natural Resources [Page 31](#)
11. Quality of Life and Vibrant Communities [Page 34](#)
12. Access, Enjoyment and Understanding [Page 37](#)

1. The Kent Downs AONB

A vision is a description of what an organisation would like to achieve or accomplish and is intended to serve as a guide for what action will be taken in the future.

The overarching ten-year vision for the Kent Downs AONB included in the Draft Management Plan 2020-25 is as follows:

“In 2030... the qualities and distinctive features of the Kent Downs AONB, the dramatic south-facing scarp, 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.

“The Kent Downs has become a landscape where rapid change supports the AONB’s distinctive features. Responses to development pressures and climate change have enhanced landscape character and what is valued by people about the landscape. The Kent Downs landscape is recognised and valued, enjoyed and cherished and its future conservation and enhancement is a certainty.

“Strong, assertive leadership from the AONB partnership along with positive partnerships with key organisations, local people and land managers act together with wider publics to conserve, enhance, enjoy and promote a nationally and internationally recognised and valued landscape.”

Q3. To what extent do you agree or disagree with the vision for the Kent Downs AONB in 2030

See page 3. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q3a. Please provide any comments on the vision here:

The County Council notes that the vision has been altered to a shorter period (ten years) because of the scale and pace of change in Kent, and would like to highlight the need for the adopted AONB Management Plan to be reviewed regularly, within that ten year period, particularly due to the speed at which government policy changes. An example would be the Government’s white paper ‘Planning for the future’ of which preliminary details have emerged only during the consultation period of the AONB Management Plan. The Government’s White Paper gives prominence to areas designated as AONB and the continuing importance of the special requirements to protect the landscape.

The County Council is pleased to have the opportunity to review the draft AONB Management Plan, which now provides reference, and includes commitments, to tackling the UK climate change and ecological emergency, strengthening focus on sustainable, low carbon development.

The County Council welcomed the opportunity to participate in the stakeholder workshops and the engagement throughout the development of this Management Plan. This engagement has

ensured the perceptions of Kent and Medway’s residents on the countryside and landscapes are evidenced within the proposed Management Plan.

The County Council supports the reference to the draft Kent Climate Change Risk and Impact Assessment¹, which has now been finalised. All Kent and Medway local authorities have now declared or recognised the UK climate emergency. KCC is involved in a number of new studies, such as our Natural Solutions to Climate Change Study, which will provide further evidence to support and refine the Management Plan’s climate change priorities.

Although the Management Plan’s commitment to achieving net-zero greenhouse gas emissions is welcomed; the County Council would caution the feasibility of achieving this target by 2030. Through the framework of the Kent and Medway Energy and Low Emissions Strategy², KCC and its partners have agreed a vision for the county of Kent to reach Net Zero by 2050, which also reflects the UK target and the advice of the UK Committee on Climate Change.

The County Council notes there is no explicit commitment within the vision to the opportunity afforded by forthcoming changes in agricultural payments and interventions (Environmental Land Management Scheme (ELMS)), nor the potential to restore and re-wild on a large-scale to support delivery of ecosystem services and recovery of biodiversity.

Attention is drawn to a small typographical error – ‘*the Kent Downs offer a greatly valued landscape of peace, beauty and space to breathe.*’

The Draft Management Plan identifies special components, characteristics and qualities of the Kent Downs AONB.

- 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

Q4. To what extent do you agree or disagree that we have identified what makes the area distinctive and special to you?

Select **one** option only.

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

¹ <https://www.kent.gov.uk/about-the-council/strategies-and-policies/environment-waste-and-planning-policies/environmental-policies/kents-changing-climate>

² <https://democracy.kent.gov.uk/documents/s90435/Item%2012%20-%20Appendix%201%20-%20KM%20Energy%20and%20Low%20Emissions%20Strategy.pdf>

Q4a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The County Council notes there is no reference to ecosystem services, including aquifer protection, soil retention, flood attenuation, air and watercourse quality, carbon sequestration and rehabilitation of marine environment.

The Draft Management Plan also identifies the social and economic components which are key to the future conservation and enhancement of the Kent Down AONB. See page 6.

- Vibrant communities
- Access, enjoyment and understanding

Q5. To what extent do you agree or disagree that we have identified the key social and economic components?

*Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
x					

Q5a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The County Council supports a key focus of the Management Plan in ensuring socially, economically and environmentally sustainable communities and settlements.

2. The Management of the Kent Downs AONB

Our vision for the management of the Kent Downs AONB is as follows:

“In 2030... the Kent Downs AONB is widely recognised and greatly valued. It is a landscape cherished and held in the highest esteem by those who visit, live and work there and nearby and by those who influence its future. Residents and visitors know where the AONB is and they understand its character and qualities and support the purposes of its designation. The Kent Downs AONB partnership is acknowledged, supported, funded and equipped to be the main and an influential and effective advocate and champion for the AONB. A diverse range of individuals and organisations are delivering positive action on the ground and are collaboratively engaged in the partnership and management planning. The AONB partnership is engaging and open about the conservation and management of the AONB.”

Q6. To what extent do you agree or disagree with our vision for the management of the Kent Downs AONB?

See pages 9 – 18. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q6a. Please provide any comments on our vision for the management of the Kent Downs AONB here:

In respect of future management of the AONB, the Management Plan could include a focus on resilient landscapes, ecological restoration and connectivity. This should address functioning natural ecosystems, with lost habitats and wildlife restored, delivering enhanced ecosystem services for the benefit of local communities and economy, as well as biodiversity and the climate.

Q7. To what extent do you agree or disagree that we have identified the right aims for the management of the Kent Downs AONB?

See page 20. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q7a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The aims could also include enabling a resilient landscape, ecological restoration and connectivity – addressing natural ecosystems, lost habitats and wildlife restoration.

Q8. To what extent do you agree or disagree that we have identified the right principles for management of the Kent Downs AONB?

See page 20. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
x					

Q8a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

KCC is committed to working with partners to ensure that the Management Plan achieves a partnership approach to the delivery of a resilient AONB, with restored natural processes, habitats and biodiversity.

3. Sustainable Development

Our vision for sustainable development is as follows:

“In 2030 ... the principles of sustainable development are at the heart of the management of the Kent Downs. Change reinforces and enhances the characteristics, qualities and distinctiveness of the Kent Downs and benefits its communities and economy. While the surrounding urban areas have expanded considerably, innovative management techniques and policy approaches successfully address the pressure and opportunities presented by growth to the landscapes of the AONB.

“The impacts of climate change are being felt but the mitigation and adaptive responses taken are landscape led, effective and carefully chosen to enhance the characteristics, qualities and distinctiveness of the landscape rather than detracting from them. The natural capital and ecosystems service provision of the Kent Downs has been enhanced. Important areas of tranquillity have been identified, protected and expanded and provide ‘oases of calm’.”

Q9. To what extent do you agree or disagree with our vision for sustainable development?

See pages 23 – 26. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q9a. Please provide any comments on our vision for sustainable development here:

The Kent Downs has significant influence over drinking water aquifers in terms of recharge and contamination risk, the quality and flow rates of watercourses, quality of coastal marine habitats, soil retention and restoration and air quality, including carbon sequestration. The AONB is also an ideal location to achieve landscape scale restoration, resulting in fully functioning ecosystems. The Kent Downs therefore should have a key role in mitigating and balancing any negative environmental impacts of the significant growth that Kent has (and continues to) experience - this could be included within the vision for sustainable development.

Q10. To what extent do you agree or disagree that we have identified the right guiding themes for sustainable development?

See pages 26 – 28. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q10a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

A further guiding theme could be the creation of resilient and diverse landscapes. These landscapes will play an important role in developing resilience to extreme weather patterns resulting from climate change, and ecological breakdown . This theme is relevant to Kent communities, economy and health.

Another guiding theme could also be the response to the local and global ecological emergency, encompassing restoration of fully functioning ecosystems and returning lost habitats and species to the landscape.

Q11. To what extent do you agree or disagree that we have identified the right recurrent themes for sustainable development?

See pages 29 - 31. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q11a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

This could also include ensuring a resilient landscape that delivers a range of ecosystem services; a restoration of fully functioning ecosystems, returning lost habitats and species as appropriate into the landscape.

Q12. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for sustainable development?

See page 31. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q12a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The County Council recommends that the Management Plan should also be explicit about the threats confronting the AONB. Threats could include the overexploitation of groundwater; loss of soils; decline in biodiversity; air and noise pollution from transport infrastructure; unsustainable levels of visitor footfall; pressures such as traffic, fly-tipping, off-road activity and vandalism; habitat fragmentation; new pests and pathogens; unsustainable socio-economic and demographic change within settlements and the trend towards ‘over-tidying’ of the landscape and agricultural change.

Q13. To what extent do you agree or disagree that we have identified the right aims for sustainable development?

See page 32. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q13a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Resilient and diverse landscapes have a role in building resistance to climate change and ecological changes, and given the relevance to Kent’s communities, economy and health, these landscapes should be considered as an aim for sustainable development.

As part of the response to the national and local ecological emergency, there should also be an aim to encompass the restoration of fully functioning ecosystems, returning lost habitats and species to the landscape.

Q14. To what extent do you agree or disagree that we have identified the right principles for sustainable development?

See pages 33. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q14a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

KCC’s comments to question 13a apply to this question as well.

4. Landform and Landscape Character

The section is informed by the accompanying **Draft Landscape Character Assessment** which details the identifying characteristics of the landscape of the Kent Downs AONB and makes landscape management recommendations on actions, investments and priorities to conserve and enhance the landscape. **See Section 3 of this questionnaire on page 40** to answer the questions on the Landscape Character Assessment.

Our vision for landform and landscape character is as follows:

“In 2030... the rich diversity of landscape character and qualities distinctive to the Kent Downs are protected, enhanced and managed to the highest standards in a co-ordinated and continual programme. The special characteristics and qualities of the Kent Downs AONB are widely recognised, valued and strengthened and landscape character informs land and resource management, nature recovery plans, intended net gain and natural capital investments, responses to climate change and development decisions.”

Q15. To what extent do you agree or disagree with our vision for landform and landscape character

See page 36. Select **one** option only.

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q15a. Please provide any comments on our vision for landform and landscape character here:

The County Council recommends that direct reference should be given to the landscapes that the AONB seeks to protect and restore. In consideration of the restoration of fully functioning ecosystems, this could include a rich mosaic of vegetation-types maintained by large native (or facsimile native) herbivores and predators, habitat connectivity (especially in relation to woodland), recovery of water courses and wetlands and a rehabilitation of coastal marine habitats.

High input and maintenance habitats are unsustainable and potentially environmentally counterproductive, so there should be an emphasis upon the restoration of natural processes.

Q16. To what extent do you agree or disagree that we have identified the right landscape character types and areas within the Kent Downs AONB?

See pages 36 - 39. Select **one** option only.

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q16a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The Management Plan should seek to appropriately maintain landscapes that may be damaged by centuries of overgrazing, over extraction and land drainage, habitat fragmentation and deforestation. Consideration should be given to the identification of the optimal landscape and biodiversity outcomes to deliver vital ecosystem services, tourism opportunities and wildlife restoration.

Q17. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for landform and landscape character?

See page 40. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q17a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Key threats should also include the unsustainable level of groundwater abstraction and land drainage, traffic and visitor pressure, loss of soils to erosion, over-tidying of the landscape, over-grazing, unsustainable agricultural change and loss of key habitats and species.

Opportunities should include potential for landscape-scale restoration of fully functioning ecosystems and restoration of lost habitats and wildlife.

Q18. To what extent do you agree or disagree that we have identified the right aims for landform and landscape character?

See page 41. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q18a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The Management Plan should seek to deliver a restored and fully functioning landscape, with specific aims on landform and landscape recovery - addressing such areas as a mosaic of woodland, scrub, down land and wetland.

Q19. To what extent do you agree or disagree that we have identified the right principles for landform and landscape character?

See pages 41. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q19a If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The Management Plan should also include consideration of surface and ground water and resulting water quality issues. Aquifer recharge and protection alongside restored surface water features should be referenced.

5. Biodiversity

Our vision for biodiversity is as follows:

“By 2030... the distinctive wildlife habitats of the Kent Downs are understood better, enjoyed and celebrated and are in favourable, resilient condition with individual characteristic species flourishing. There is a far-sighted nature recovery plan being implemented for the Kent Downs, which recognises and responds to the substantial changes that will be experienced and is linked to a wider nature recovery network. An approach to intended biodiversity net gain is understood and agreed and is achieving advances in biodiversity and habitats across the Kent Downs. There has been an increase in the extent and quality of key characteristic habitats and abundance of species of the Downs. People, policy and funding regimes recognise, value and support the importance of nature in the Kent Downs.”

Q20. To what extent do you agree or disagree with our vision for biodiversity?

See pages 44 – 47. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q20a. Please provide any comments on our vision for biodiversity here:

The Management Plan should include consideration of how damaged and lost habitats and species are to be restored on a landscape scale.

Specific reference should also be made to restoring lost wildlife and the functions of a healthy ecosystem should be incorporated, including the principles of rewilding (encompassing terrestrial, aquatic and marine habitats).

Q21. To what extent do you agree or disagree that we have identified the right special characteristics and qualities for biodiversity?

See pages 47 - 51. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q21a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

There should also be focus on restoring the natural habitat-types of the AONB, as opposed to maintaining high input and heavily managed landscapes. As the Kent Downs is a managed landscape, there is need to consider how far back the identification of natural habitat types goes, which may be suitable for the area. Restoring lost species and enabling them to shape vegetation regeneration will benefit landscape and biodiversity and deliver increased economic viability and ecosystem services (e.g. Cairngorms Connect and Knepp).

Flood meadows and wet woodland were a historic feature of the Kent Downs, especially on the clay, which have been lost to agriculture, abstraction and land drainage - these habitats could therefore be considered.

Q22. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for biodiversity?

See page 52. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q22a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Woodland is the natural vegetation across the AONB, and its restoration on a landscape scale through enhancing connectivity, utilising natural regeneration and other woodland creation measures, should be emphasised. There is a risk that the creation of woodland will result in the loss of other priority habitats (such as chalk grassland). Habitat creation should therefore be encouraged only in the correct locations.

The section should seek to encourage sustainable grazing behaviours within the AONB.

The Management Plan does not specifically highlight the threat from intensive agricultural practice; just specific issues, such as leaving the EU, reduction in grazing or habitat fragmentation. However, farming practices are and continue to be a threat and there are also opportunities from leaving the EU such as future subsidies for farms being linked to protection of the environment.

In respect of point f - the “need to respond to the repeated failure to meet Biodiversity targets and the opportunity for the Kent Downs AONB to make a significant local contribution to meet future targets”, it is requested that clarity is provided on which targets are being referred to, how much they were missed by and who is responsible for setting, and who for meeting, these targets.

Q23. To what extent do you agree or disagree that we have identified the right aims for biodiversity?

See page 54. Select **one** option only.

Strongly agree Tend to agree Neither agree nor disagree Tend to disagree Strongly disagree Unsure

x					
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Q23a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

There should also be an aim focused on assessing the feasibility and opportunities around the restoration of naturally functioning ecosystems with lost habitats and wildlife restoration.

Q24. To what extent do you agree or disagree that we have identified the right principles for biodiversity?

See page 54. Select **one** option only.

Strongly agree Tend to agree Neither agree nor disagree Tend to disagree Strongly disagree Unsure

x					
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Q24a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The County Council’s response to Question 23a also relates to this question.

6. Farmed Landscape

Our vision for farmed landscape is as follows:

“In 2030... the Kent Downs AONB is a place where agriculture takes and is appreciated for a pivotal role in the conservation of natural beauty and landscape qualities and character as well as wider. Sustainable farming is the predominant land-use of the AONB and the heritage of mixed farming is retained in a contemporary context, supports and enhances landscape character, nature and is an increasingly important part of the Kent Downs contribution to achieving net zero carbon emissions. There is a greater public understanding of the roles of farming and more opportunities to gain carefully managed access to farmed landscape and to understand farming systems. Despite the volatile context, a broad range of crops are sustainably produced and are suited to the increasing extremes of climate, local conditions and market forces as well as the landscape. Naturally diverse permanent grasslands are well managed by grazing and orchards, plants and hop gardens retain an important place in the landscape. The flourishing number of vineyards are managed in a way that conserves the characteristics and qualities of the AONB. The high-quality products of the Kent Downs are commercially successful and high environmental quality is a market advantage.”

Q25. To what extent do you agree or disagree with our vision for farmed landscape?

See pages 57 – 61. Select **one** option only.

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
		x			

Q25a. Please provide any comments regarding our vision for farmed landscape here:

KCC considers that others are better placed to comment in detail on the Managements Plan’s vision for farmed landscape. However, KCC welcomes the recognition of the understanding of the roles of farming and notes that this could change further through the passing of the Agricultural Bill and the longer-term implications that this may have on farming practices.

The Agricultural Bill will provide ‘public money for public goods’ where future payments to farmers should move away from the area they own or rent (farm) towards environmental and cultural benefits that the land can provide and society needs (native breeds of livestock, conservation of agricultural crops and steps to improve and protect the quality of the soil, for example). The payments should reward good practice rather than pay farmers not to pollute, and the impetus will be to move away from CAP and towards a more sustainable systems of farming and land management.

This will force a change from traditional farming to regenerative farming as Direct Payments are phased out over the next five or so years. Defra also plans to ‘delink’ Direct Payments from the requirement to farm the land with farmers having a choice on how they use their ‘delinked’

payments to invest in improving the productivity of their farm, diversify their business or retire from farming.

Many farmers will decide they are too old and retire or rent to other farmers who will become more efficient and productive because they will have to be under the new payments structure.

The new Environment Bill will encourage biodiversity and net gain, which will encourage farmers to make best use of marginal land. This could mean the best land being used for top paying crops (fruit and viticulture), with livestock being used to farm or 'manage' marginal land (this fits in with the thinking of the AONBs and Wildlife Trusts).

KCC welcomes any initiative that will help the agri-food economy to deliver productivity, jobs and nutritional security, provide a natural environment that is a great place to live, work and visit and create clean sustainable growth – with a vibrant rural economy delivering on net zero. This is in line with the objectives of the National Farmers' Union (NFU).

Q26. To what extent do you agree or disagree that we have identified the right special characteristics and qualities for farmed landscape?

See page 66. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
		x			

Q26a. If you have answered 'tend to disagree' or 'strongly disagree', please tell us why here:

Q27. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for farmed landscape?

See page 67. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q27a. If you have answered 'tend to disagree' or 'strongly disagree', please tell us why here:

One impact to be aware of is the potential of the smaller farm to disappear and be taken over by a larger enterprise and what this will mean to a changing landscape – e.g. larger fields to accommodate larger, more cost-effective machinery and the effect on changing the landscape character.

Q28. To what extent do you agree or disagree that we have identified the right aims for farmed landscape?

See page 68. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
		x			

Q28a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Q29. To what extent do you agree or disagree that we have identified the right principles for farmed landscape?

See page 69. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q29a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

One impact to be aware of is the potential of the smaller farm to disappear and be taken over by a larger enterprise and what this will mean to a changing landscape – e.g. larger fields to accommodate larger, more cost-effective machinery and the effect on changing the landscape character.

7. Woodlands and Trees

Our vision for woodlands and trees is as follows:

“In 2030... the characteristic Kent Downs network of woodland and trees is greater in extent and is conserved and enhanced for its landscape, wildlife and historic value. Sustainably managed woodlands and trees are resilient to stressors such as pests, disease, visitor pressure and climate change, they provide inherent mitigation and adaption to that change. Buoyant markets for woodland products support the productive, sustainable management of trees and woodlands; high quality multi-functional management provides well-used places for leisure and recreation, health and wellbeing and are rich in characteristic wildlife.”

Q30. To what extent do you agree or disagree with our vision for woodland and trees?

See pages 72 – 77. Select **one** option only.

Strongly agree Tend to agree Neither agree nor disagree Tend to disagree Strongly disagree Unsure

	x				
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Q30a. Please provide any comments on the vision for woodland and trees here:

The County Council welcomes reference to the importance of the AONB on the wellbeing of its residents and the mental health benefits that the AONB can bring. The Management Plan should consider the restoration of lost woodland species, through habitat creation and reintroductions (both plant and animal species).

Q31. To what extent do you agree or disagree that we have identified the right special characteristics and qualities for woodlands and trees?

See page 77. Select **one** option only.

Strongly agree Tend to agree Neither agree nor disagree Tend to disagree Strongly disagree Unsure

	x				
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Q31a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The woodland across the AONB has been changed by centuries of human activity. The Management Plan should consider the recovery of more natural woodland types, with diversity enhancing ecosystem services and biodiversity.

Q32. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for woodlands and trees?

See page 78. Select **one** option only.

Strongly agree Tend to agree Neither agree nor disagree Tend to disagree Strongly disagree Unsure

	x				
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Q32a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The Management Plan should make reference to the the fragmentation of woodland habitats across the Kent Downs by intensive land uses such as arable farming and highway infrastructure. Achieving linkage and reconnection of woodland will increase their resilience and enhance landscape quality.

Reference should be made to the fact that woodland is the natural vegetation across part of the Kent Downs and its support for biodiversity. Restoration of natural processes within the AONB woodlands should also be considered.

There are other important habitat types in the Kent Downs (such as grassland) - the support for woodland should not result in the loss of other habitats.

Reference should be made to secondary-woodland, scrub and open mosaic habitats (including brownfield sites). Secondary woodland should be created as part of on going woodland management, not to the loss of other suitable habitats.

Q33. To what extent do you agree or disagree that we have identified the right aims that support the sustainable management of woodlands and trees?

See page 79. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q33a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The Kent Downs offers a significant opportunity to provide restored areas of wilderness with significant potential for ecotourism and a re-established, more natural sense of place.

Q34. To what extent do you agree or disagree that we have identified the right principles that support the sustainable management of woodlands and trees?

See page 80. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
		x			

Q34a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

8. Historic and Cultural Heritage

Our vision for historic and cultural heritage is as follows:

“In 2034... the rich heritage of historic landscape, buildings, settlements and sites that characterise the Kent Downs’ historic and cultural fabric are maintained in favourable condition and are enhanced to reflect their local character and significance. The environmental performance of historic buildings is enhanced in a way that is sensitive to their character. They are understood and cherished by local people and visitors alike for their intrinsic value and for their important contribution to quality of life and rural economy. Vibrant and exciting artistic and cultural

interpretation and celebration of the Kent Downs is supported and strong partnerships for the arts and cultural development in the Downs is in place and delivering extraordinary, contemporary work enjoyed by and inspiring wide and diverse publics.”

Q35. To what extent do you agree or disagree with our vision for historic and cultural heritage?

See page 83. Select **one** option only.

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
x					

Q35a. Please provide any comments on the vision for historic and cultural heritage here:

The County Council is supportive of this vision, and if achieved, it will deliver a well-conserved and valued heritage in an attractive landscape.

The County Council recommends the following amendment:

“In 2034... the rich heritage of historic landscape, buildings, settlements and sites (alongside their settings) that characterise the Kent Downs”

Q36. To what extent do you agree or disagree that we have identified the right special characteristics and qualities for historic and cultural heritage?

See pages 83 - 89. Select **one** option only.

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q36a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Q37. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for historic and cultural heritage?

See page 89. Select **one** option only.

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q37a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The settings of some of the most important historic sites in the AONB are compromised by surrounding land uses. The County Council recommends the Management Plan includes consideration of appropriate landscape management and protection. This would benefit both historic sites, the wider landscape and tourism/visitor experience. For example, the Medway Megaliths are significantly impinged upon by intensive land uses and development.

Other threats to heritage include:

- The gradual degradation of the landscape and its historic features caused by localised actions of land managers. These might include new or widened accesses, hedgerow damage and vehicle movements.
- Climate change also offers an increasing threat to heritage assets through the drying and waterlogging of archaeological sites and the impact of more severe weather events on both archaeological sites and historic buildings.
- The development and maintenance of infrastructure such as utilities, power generation, roads and railways.
- Change of use of historic buildings through permitted development rights.

Q38. To what extent do you agree or disagree that we have identified the right aims for historic and cultural heritage?

See page 90. Select **one** option only.

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
			x		

Q38a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The County Council considers the Management Plan should include a greater emphasis on using the historic environment to shape new development and contribute to a distinctive sense of place. This will be achieved not by merely ensuring that heritage is conserved, but by ensuring that the heritage is considered from the earliest stages of project development.

Proposals for new development, village design and Neighbourhood Planning documents should include an appropriate description of the significance of any heritage assets that may be affected including the contribution of their setting. The impact of proposals and plans on the significance of the heritage assets should be sufficiently assessed using appropriate expertise where necessary.

Desk-based assessment, archaeological field evaluation and historic building assessment may be required as appropriate to the case.

The Management Plan could also include the following aims:

- Systems should be put in place to ensure that historic environment information and advice is readily accessible to local communities to help them shape the places in which they live.
- A programme of mapping of cropmarks identified on aerial photographs is to be developed. With the use of GIS packages, transcription could be carried out through a supervised volunteer programme perhaps through the Kent Historic Environment Record.

It should also be recognised that there may be archaeological sites within the AONB that do not relate to the existing landscape. An example is Palaeolithic sites whose landscape of origin was very different from the landscape today. There will be times when the management of the modern landscape conflicts with the needs of such sites and it is important that they are not negatively impacted by modern landscape management needs.

Q39. To what extent do you agree or disagree that we have identified the right principles for historical and cultural heritage?

See page 90. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
			x		

Q39a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

“HCH2 – A wider understanding of the historic, cultural, scientific and artistic importance of the Kent Downs landscape and its historic character will be supported in part to inform the interpretation and management of the AONB.”

To achieve the wider understanding of the landscape that is sought, it will be necessary to research further its historic origins. One way to achieve this is by appropriately detailed historic landscape characterisation.

The Kent Historic Landscape Characterisation (2001)³ is a tool for understanding this historic context and should be used to inform decisions taken regarding the landscape character of the AONB. Ideally, however, this county level study should be both updated and deepened to be more relevant at the district and local level, as has happened recently for the High Weald AONB area and on the Hoo Peninsula. This would allow more effective decision-taking and assist the application of key landscape principles on a case-by-case basis.

The County Council would also ask that the historic aspects of landscape character are fully integrated into considerations of more general character. There should be consideration of the role that the past has played in establishing the modern character and the extent to which historic features survive and need consideration in development control and agricultural practice.

“HCH7 – The protection, conservation, and enhancement of heritage features under threat will be pursued through policies, projects and partnerships”

The County Council recommends the following amendment:

“The protection, conservation, and enhancement of heritage features under threat will be pursued through policies, projects, training and partnerships.”

³ https://www.kent.gov.uk/__data/assets/pdf_file/0014/56210/Kent-Historic-Landscape-Character-volume-1.pdf

9. Heritage Coast

Our vision for the Heritage Coast is as follows:

“In 2030... the special place that the White Cliffs of Dover have in the hearts and minds of millions of people is justified by the reality experienced on the ground. Collaborative effort continues to transform the management of the coasts which meets the needs of the landscape, natural and historic environment and communities, while supporting the sustainable regeneration of the coastal economy including the coastal towns.”

Q40. To what extent do you agree or disagree with our vision for the heritage coast?

See pages 93 – 97. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	X				

Q40a. Please provide any comments on the vision for the heritage coast here:

The County Council recommends reference within the Management Plan to the restoration of coastal/marine habitats and wildlife.

Q41. To what extent do you agree or disagree that we have identified the right special characteristics and qualities for the heritage coast?

See page 97. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	X				

Q41a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Coastal habitats have undergone degradation in terms of landscape and biodiversity. ANOB coastal fringes should be a key focus of future activity to enable the recovery of habitats in these areas to restore their wildness.

Q42. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for the heritage coast?

See page 98. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	X				

Q42a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

No take zones and initiatives to restore lost marine and littoral habitats and species could feature within the Management Plan - initiatives in the South West of the British Isles provide useful lessons for such restoration.

Q43. To what extent do you agree or disagree that we have identified the right aims for the heritage coast?

See page 99. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	X				

Q43a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The County Council recommends the following aim is included within the Management Plan:

Restoring lost marine and coastal habitats and species and recovering the ‘wildness’ of our Heritage Coast.

Q44. To what extent do you agree or disagree that we have identified the right principles for the heritage coast?

See page 99. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	X				

Q44a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The County Council recommends the following key principle is included within the Management Plan:

Restoring and protecting marine and coastal habitats and species and the ‘wildness’ of our Heritage Coast.

10. Geology and Natural Resources

Our vision for geology and natural resources is as follows:

“In 2030... great care is taken to conserve and manage the natural resources of the Kent Downs particularly soil, air, ground and river water. New and innovative ways to both reduce resource use and enhance the existing natural capital have been adopted which support landscape character and qualities, the economy and communities. The need to conserve and enhance natural beauty means mineral resource mining occurs away from the AONB, except in exceptional circumstances, and worked out quarry sites have been restored to enhance local landscape character.”

Q45. To what extent do you agree or disagree with our vision for geology and natural resources?

See pages 102 – 105. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
			x		

Q45a. Please provide any comments on the vision for geology and natural resources here:

Minerals and Waste

In respect of the sub-heading ‘geology’ under the ‘Overview’ heading (10.1), the Kent Downs AONB and its setting contain important remaining resources of sharp sand, gravels and building sands. Many of the less constrained sites containing these resources have been exploited or allocated, meaning that pressure to exploit the resources in or in the setting of the Kent Downs is expected to increase. The Kent Minerals and Waste Strategy Local Plan 2013-30 (KMWLP) recognises the importance and sensitivity of the landscapes of the AONB and its setting in its narrative and policies.

This is somewhat limited, as the KMWLP does not preclude mineral exploitation from occurring in the AONB area; Policy DM 2 states:

“National Sites

Designated Areas of Outstanding Natural Beauty (AONB)(107) have the highest status of protection in relation to landscape and scenic beauty. Regard must be had to the purpose of the designation when exercising or performing any functions in relation to, or so as to affect land, in an AONB. For the purposes of this policy, such functions include the determination of planning applications and the allocation of sites in a development plan.

Planning permission for major minerals and waste development in a designated AONB will be refused except in exceptional circumstances and where it can be demonstrated that it is in public interest. In relation to other minerals or waste proposals in an AONB, great weight will be given to conserving its landscape and scenic beauty. Proposals outside, but within the setting of an AONB will be considered having regard to the effect on the purpose of conserving and enhancing the

natural beauty of the AONB”

The policy is consistent with the approach as set out in the NPPF 2019, mineral and waste development in AONB areas has to be justified as a matter of ‘exceptional circumstances’ that are in ‘the public interest’. Therefore, to reference this national planning policy approach that is reflected in the KMWLP is recommended to strengthen the Management Plan’s narrative. However, it should also be understood that mineral and waste development, though run by private/corporate bodies, is effectively development that is accepted as in principle ‘in the public interest’ (see Section 15, para. 172 page 49/50 of the NPPF 2019). It provides for the necessary mineral materials for other development and maintenance while waste developments are integral to the increased drive for sustainable development and the circular economy. This is as important to AONB areas as it is to the non-designated areas.

The Management Plan should also include reference to economically important land-won mineral deposits are safeguarded by policies of the KMWLP from development that may cause them to become sterilised. Any waste management and mineral processing and handling facilities that are currently operating in the AONB are also safeguarded from direct loss and any development within 250m has to demonstrate that there is compatibility with the unimpeded continued operation of the facility. This safeguarding principle is central to mineral and waste planning, obviously, and the Plan’s lack of reference to this is an omission.

Sustainable Urban Drainage Systems (SuDS)

The water environment is covered primarily within Chapter 10 Geology and natural resources.

The County Council, as Lead Local Flood Authority would recommend that there is a wider recognition of surface water within the natural environment. The AONB area includes sections of several main rivers, but it also includes many ordinary watercourses. References to “water” should not only consider “ground and river water” but the value which is provided to the landscape through Kent’s many small streams and ditches.

Within Chapter 10.1, the focus of the natural capital consideration of water is directed at aspects in relation to water supply but no reference is made as to flood control or surface water pollution issues.

Within Chapter 10.2, the water environment focuses on the “dry landscape” of the chalk areas of the AONB but there should still be consideration of other areas, particularly those areas within the river valley areas, e.g. Darent, Medway and Stour catchments.

The proposed principles include GNR5, which propose commitment to the catchment based approach specifically in relation to water supply, ecology and conservation of the landscape. The County Council would strongly recommend that there is commitment to pursuing natural flood management, which would reflect the flood risk threat which is listed in Chapter 10.3.

The County Council would also recommend consideration of the areas which are not considered to be chalk areas in terms of SuDS.

Q46. To what extent do you agree or disagree that we have identified the right special characteristics and qualities for geology and natural resources?

See page 105 - 106. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
		x			

Q46a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Q47. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for geology and natural resources?

See pages 107 - 108. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
		x			

Q47a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Under the ‘Geology and natural resources’ section (10.5), the Plan has a set of ‘principles’ that encompass natural resources. They are, in relation to waste and minerals, GNR2 and GRN3.

“GNR2 - Careful management and sensitive restoration of existing minerals and waste sites in or affecting the Kent Downs will be pursued”

“GNR3 - A careful approach will be taken to reduce the likely pressure for new minerals sites in or affecting the Kent Downs AONB including ensuring the provision of wharfs to enable alternative sources to be provided.”

Principle GNR2 is a rational approach to reducing the impact of waste and mineral development and the restoration of sites within the AONB.

The Management Plan should be clear that alternative supply facilities are already safeguarded and are being used for their land-won mineral supply.

The Management Plan should recognise that land-won supply, particularly for aggregate forming minerals, is central to the mineral planning system.

The NPPF 2019 makes clear that a seven-year landbank should be maintained of aggregates serving distinct markets (10-year land-banks are required to be maintained for hard rock).

Therefore, mineral supply to maintain these land-banks to meet an identified need into the future has to be identified in mineral plans. Whilst it is recognised that such supply should be identified by mineral deposits outside AONB areas, the national legislation does not preclude it, given the ‘exceptional’ test ‘in the public interest’ discussed above.

It is considered that principle GNR3 could be amended to reflect that mineral planning for future supply has the potential to be a significant matter for the Management Plan in the future, given the finite nature of mineral deposits outside AONB areas. Also, that importation is not a direct alternative to securing a land-won supply, but a ‘consideration’ to be assessed and evaluated by the mineral planning authority.

Q48. To what extent do you agree or disagree that we have identified the right aims for geology and natural resources?

See page 108. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q48a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

To boost the ambition of Aim 5, the County Council recommends that reference could be made to restoring wilderness and fully functioning ecosystems as opposed to simply green infrastructure.

Q49. To what extent do you agree or disagree that we have identified the right principles for geology and natural resources?

See page 108. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q49a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The County Council’s question 48a applies to this question too.

11. Quality of Life and Vibrant Communities

Our vision for quality of life and vibrant communities is as follows:

“In 2030... a diversity of people and communities are central to the conservation, enhancement and enjoyment of the Kent Downs; they value this special place and feel welcome to enjoy, experience and benefit from the AONB. People and communities have a strong, positive influence over change through being engaged and active participants. Communities’ work and voluntary activity marries social and economic well-being with landscape conservation and enhancement. Individuals and organisations choose to buy goods and services that in themselves benefit the Kent Downs landscape and economy.

“The health and well-being benefits of contact with nature and beauty have become central to the purposes and management of the landscape and the Kent Downs partnership.”

Q50. To what extent do you agree or disagree with our vision for quality of life and vibrant communities?

See pages 111 – 116. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q50a. Please provide any comments on the vision for quality of life and vibrant communities here:

It is recommended that section 11.3 b), which makes reference to superfast broadband, is updated to include a reference to superfast and gigabit capable broadband, so it aligns with current government policy, as well as good mobile broadband services (key for local residents as well as those seeking to enjoy the landscape).

The Management Plan should also seek to emphasise that fully functioning, resilient landscapes support resilient communities and good quality of life. Flood attenuation, ground water recharge and quality, air quality, urban cooling, carbon sequestration and contact with nature all derive from beautiful and biodiverse landscapes.

Reference to NHS link workers should be supplemented with reference to local authority and primary care social prescribers, as well as the vital role of the voluntary and community sector in such efforts.

Q51. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for quality of life and vibrant communities?

See page 116 - 118. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
		x			

Q51a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The Management Plan recognises the importance of the diversification of the employment base in AONB.

The County Council considers that waste processing and mineral supply may also be part of the area’s diversification of employment base, if sensitively developed.

As Minerals and Waste Planning Authority, the County Council acknowledges that the AONB may hold important mineral resources for historical building restoration using materials of a highly localised nature for specific architectural vernacular purposes. Such activities may present opportunities for local employment. The Management Plan could recognise these possible opportunities for employment diversification.

The County Council also notes the inclusion of an aim for a rural economy where residents and visitors value sustainable local produce and services. Local facilities for food shopping took on an even greater importance during the pandemic, and this offers the potential to encourage more localised shopping habits. The delivery of cohesive communities and of affordable community facilities that help to enable cohesiveness, is crucial.

Social isolation should be explicitly recognised and considered within the Management Plan.

Q52. To what extent do you agree or disagree that we have identified the right aims for quality of life and vibrant communities?

See page 118. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
		x			

Q52a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Q53. To what extent do you agree or disagree that we have identified the right principles for quality of life and vibrant communities?

See page 118. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q53a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

VC10 – there is a typographical error which makes it difficult to be certain on what the principle being laid out is

VC11 – this principle could be strengthened by setting out an ambition to better bring together and coordinate provision of health and wellbeing ‘assets’ in local settings within the AONB

12. Access, Enjoyment and Understanding

Our vision for access, enjoyment and understanding is as follows:

“In 2030... the Kent Downs AONB is a place of natural beauty with opportunity and access for all people; they feel welcome to participate in quiet recreation for health, relaxation, enjoyment and for cultural and artistic expression.

“Improved management ensures that the Public Rights of Way and much of the highway network is safe, quiet and convenient for walkers, cyclists and horse riders and public transport is an attractive option to reach and enjoy the landscape. Maintenance of the Public Rights of Way and highway network is sympathetic to biodiversity and landscape character.

“The Kent Downs AONB is recognised, valued and celebrated by residents, visitors and by those who simply delight in the fact that it is there.”

Q54. To what extent do you agree or disagree with our vision for access, enjoyment and understanding?

See pages 121 – 128. *Select **one** option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
		x			

Q54a. Please provide any comments on the vision for access, enjoyment and understanding here:

The Management Plan should also make reference to the creation of land bridges which can mitigate the very significant negative impacts on the AONB from major roads.

The vision for a well managed and improved PRow network is supported, but the challenge of funding of this work cannot be ignored. Given the likely pressures on local government resources available in the future, consideration should be given to the means of establishing this vision.

The Management Plan highlights the predicted levels of population growth in Kent and the increasing pressures on outdoor recreation sites e.g. National Trust Langdon Bay site recording 500,000 visits a year. Taking these factors into account, it will be difficult to ensure the PRow network is quiet. Efforts can be made to spread use across the 6900km of PRow in Kent through promotion and investment in existing infrastructure, but the public are still likely to converge on the existing honeypot sites that have attractive vistas or practical on-site amenities.

Promoting the education of the community on respecting the Kent Downs is crucial in preserving its quality and helping to ease any resulting impacts from the pressures from recreation.

In addition to public transport, active travel should also be encouraged as a means of accessing the Kent Downs AONB for the reasons highlighted within the Management Plan.

Q55. To what extent do you agree or disagree that we have identified the right main issues, opportunities and threats for access, enjoyment and understanding?

See page 128. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
	x				

Q55a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The Management Plan should also make reference to the creation of land bridges which can mitigate the very significant negative impacts on the AONB from major roads.

The points highlighted in this section are generally supported, though consideration should be given to an additional point that focuses on active travel. Specifically, highlighting the need to improve walking and cycling infrastructure opportunities and encourage active travel participation for the reasons given elsewhere in the Management Plan.

Point i is welcomed, as below:

‘Improving the rural road network for its landscape quality and to promote quiet countryside recreation by managing traffic pressures to provide quiet and safe access.’

The County Council as Local Highway Authority considers that this aim could be strengthened. This is because the rural road network provides vital connections between off-road PRow routes, enabling cyclists and equestrians to access PRow with higher access rights. However, the increasing frequency and speed of vehicles along these roads (e.g. increased number of delivery drivers) can deter path users due to safety concerns. Improving the safety and security for Non Motorised Users (NMUs) along these roads would help to encourage active travel and outdoor recreation. This can be seen with the recent Covid-19 lockdown, which saw an increase in cyclists along rural lanes when vehicle movements reduced.

Q56. To what extent do you agree or disagree that we have identified the right aims for access, enjoyment and understanding?

See page 130. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
x					

Q56a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

The consultation survey results (Management Plan - Page 8) showed the PRoW network to be one of the most valued features of the Kent Downs. With this in mind, the management plan should aim to maintain and improve the PRoW network. The proposed aims would appear to support these actions and are therefore welcomed

Q57. To what extent do you agree or disagree that we have identified the right principles for access, enjoyment and understanding?

See page 130. *Select one option only.*

Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
			x		

Q57a. If you have answered ‘tend to disagree’ or ‘strongly disagree’, please tell us why here:

Concerns are raised with principle AEU2 as set out below:

“Diversions and stopping up of PRoWs will be resisted unless it can be demonstrated that they will not have a detrimental impact on opportunities for access and quiet enjoyment of the AONB landscape and historic character.”

Whilst the good intentions of this principle are recognised, concerns are raised with the implications of this approach. This is because some diversions or extinguishments may be required that deliver great public benefit or enable vital development to proceed, but do not necessarily have a positive impact on existing public access. It also fails to reflect primary legislation, established Government policy or the County Council’s policies. Whilst all proposals stand to be determined on their merits and it is for the AONB Unit to respond as it sees appropriate to any consultations, this policy is unlikely to be given any great weight.

The above said, the majority of changes to the PRoW network are beneficial or neutral in terms of their impact on use and enjoyment.

Section 3 – Draft Landscape Character Assessment

The Draft Landscape Character Assessment (which is made up of 13 individual documents) outlines the identifying characteristics of the landscape of the Kent Downs AONB and makes landscape management recommendations on actions, investments and priorities to conserve and enhance the landscape. These recommendations inform the Draft Management Plan.

Q58. To what extent do you agree or disagree with the landscape management recommendations in the draft Landscape Character Assessment?

Select **one** option in each row.

Chalk Downs	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
LCA 1A West Kent Downs						
LCA 1B Mid Kent Downs						
LCA 1C East Kent Downs						

Chalk Scarps and Vales	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
LCA 2A Kemsing Scarp and Vale						
LCA 2B Hollingbourne Scarp and Vale						
LCA 2C Postling Scarp and Vale						

Chalk Cliffs and Coast	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
LCA 3A White Cliffs Coast						

Select **one** option in each row.

River Valleys	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
LCA 4A Darent Valley						
LCA 4B Medway Valley						
LCA 4C Stour Valley						

Greensand	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
LCA 5A Sevenoaks Greensand Ridge						
LCA 5B Lympne Greensand Escarpment						

Low Weald	Strongly agree	Tend to agree	Neither agree nor disagree	Tend to disagree	Strongly disagree	Unsure
LCA 6C Low Weald Eden Valley						

Q58a. Please provide any comments on the landscape management recommendations here: *Please be as specific as is possible in your answers and provide evidence if appropriate.*

It is recognised that these landscape areas do not seek to restore natural processes, as well as lost and degraded habitats, or restore extirpated native species. Landscape character assessments can lock in modified and degraded landscapes where restoration of functioning ecosystems is impossible without significant intervention.

The County Council notes that these Landscape Character Assessment contain inaccuracies in the descriptions of historic environment features in the Medway Valley. For example – “cursus” is probably meant to be “causewayed enclosure”. These are very different sites with different land management implications. The Character Areas should be further reviewed to take account of more accurate historic environment information. The County Council would be happy to assist with this process.

The management recommendations should also be further reviewed. In the Medway Valley one for example ‘Protect historic sites (including non-designated sites) and their settings, taking into account the full range of heritage in this area- from prehistoric burial sites to 19th Century industry’ should be

amended to include 20th century heritage, which could include military or industrial remains.

Section 4 – Supporting Assessments

Q59. We have completed an Environment Report and Sustainability Assessment on the Draft Management Plan.

If you have any comments on this assessment, please provide them here:

The Environment Report and Sustainability Assessment is available at kent.gov.uk/kentdownsaonb or in hard copy on request.

To help ensure that we are meeting our obligations under the Equality Act 2010 we have undertaken an Equality Impact Assessment (EqIAs) for the draft Management Plan.

An EqIA is a tool to assess the impact any proposals would have on the protected characteristics: age, disability, sex, gender reassignment, sexual orientation, race, religion, and carer's responsibilities. The EqIA is available at kent.gov.uk/kentdownsaonb or in hard copy on request.

Q60. We welcome your views on our equality analysis and if you think there is anything else we should consider relating to equality and diversity. Please provide any comments here:

Section 5 – Additional Information

Q61. The Draft Management Plan was prepared before the Covid-19 pandemic. It will be important to consider how the Management Plan should respond to the crisis. Please provide any key considerations you think we should take into account here:

If your comments directly relate to a specific section of the Draft Management Plan, please include the name of the section with your comment.

The Management Plan should be informed by green recovery and BuildingBackBetter principles going forward.

Foot fall and visitor pressure has been unsustainable for many semi-natural sites and evidences the fact that far more land should be restored and made accessible to deal with the impact of a growing population that wants immerse itself in nature.

The reductions in vehicular traffic at the height of the pandemic proved that current orthodoxies on traffic levels and growth can be challenged if appropriate alternative infrastructure is available.

Q62. If you have any examples of landscape enhancement, biodiversity, or access improvement projects in your local area, please provide details here:

If you wish to discuss, please contact mail@kentdowns.org.uk

Boxley Warren Local Nature Reserve, The Larches, Detling and Wilder Blean project all involve elements of restoration of lost biodiversity (native Box, Small-leaved lime and Juniper at Boxley, facsimile lost herbivores at Detling and the Blean).

Q63. How did you find out about this consultation?

Select **all** that apply

- | | |
|--------------------------|---|
| <input type="checkbox"/> | Received an email from Kent County Council |
| <input type="checkbox"/> | Received an email from Kent Downs Area of Outstanding Natural Beauty Unit |
| <input type="checkbox"/> | Received an email from another organisation or contact |
| <input type="checkbox"/> | From a friend or relative |
| <input type="checkbox"/> | Newspaper |
| <input type="checkbox"/> | Social Media (Facebook or Twitter) |
| <input type="checkbox"/> | Kent.gov.uk website |
| <input type="checkbox"/> | Other |

If other, please specify:

Q64. Finally, do you any other comments to make about our Draft Management Plan?

Kent Downs AONB Citizen's Panel and Newsletter

The Kent Downs AONB is considering establishing a Citizen's Panel. Members would be asked for their feedback on a range of issues to help the AONB better understand residents' views and provide the right information to help people enjoy the landscape.

If you are interested in learning more, please visit <https://bit.ly/3cpYPng>

Visit our website KentDowns.org.uk and join our email list via <https://bit.ly/2Lg7Bsb> to stay up to date with news and events in the Kent Downs Areas Outstanding Natural Beauty.

Section 6 - More About You

We want to make sure that everyone is treated fairly and equally, and that no one gets left out. That's why we are asking you these questions. We won't share the information you give us with anyone else. We'll use it only to help us make decisions and improve our services.

If you would rather not answer any of these questions, you don't have to.

It is not necessary to answer these questions if you are responding on behalf of an organisation.

Q65. Are you.....? Select *one* option only.

<input type="checkbox"/>	Male
<input type="checkbox"/>	Female
<input type="checkbox"/>	I prefer not to say

Q66. Is your Gender the same as your birth? Select *one* option only

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No
<input type="checkbox"/>	I prefer not to say

Q67. Which of these age groups applies to you? Select *one* option only.

<input type="checkbox"/>	0-15	<input type="checkbox"/>	25-34	<input type="checkbox"/>	50-59	<input type="checkbox"/>	65-74	<input type="checkbox"/>	85 + over
<input type="checkbox"/>	16-24	<input type="checkbox"/>	35-49	<input type="checkbox"/>	60-64	<input type="checkbox"/>	75-84	<input type="checkbox"/>	I prefer not to say

Q68. To which of these ethnic groups do you feel you belong?

Select **one** option only.

White English	<input type="checkbox"/>	Mixed White & Black Caribbean	<input type="checkbox"/>
White Scottish	<input type="checkbox"/>	Mixed White & Black African	<input type="checkbox"/>
White Welsh	<input type="checkbox"/>	Mixed White & Asian	<input type="checkbox"/>
White Northern Irish	<input type="checkbox"/>	Mixed Other*	<input type="checkbox"/>
White Irish	<input type="checkbox"/>	Black or Black British Caribbean	<input type="checkbox"/>
White Gypsy/Roma	<input type="checkbox"/>	Black or Black British African	<input type="checkbox"/>
White Irish Traveller	<input type="checkbox"/>	Black or Black British Other*	<input type="checkbox"/>
White Other*	<input type="checkbox"/>	Arab	<input type="checkbox"/>
Asian or Asian British Indian	<input type="checkbox"/>	Chinese	<input type="checkbox"/>
Asian or Asian British Pakistani	<input type="checkbox"/>	I prefer not to say	<input type="checkbox"/>
Asian or Asian British Bangladeshi	<input type="checkbox"/>		
Asian or Asian British Other*	<input type="checkbox"/>		

(Source: 2011 Census)

***Other Ethnic Group - If your ethnic group is not specified on the list, please describe it here**

A Carer is anyone who cares, unpaid, for a friend or family member who due to illness, disability, a mental health problem or an addiction cannot cope without their support. Both children and adults can be carers.

Q69. Are you a Carer? Select **one** option only.

<input type="checkbox"/>	Yes
<input type="checkbox"/>	No
<input type="checkbox"/>	I prefer not to say

The Equality Act 2010 describes a person as disabled if they have a longstanding physical or mental condition that has lasted, or is likely to last, at least 12 months; and this condition

has a substantial adverse effect on their ability to carry out normal day-to-day activities. People with some conditions (cancer, multiple sclerosis and HIV/AIDS, for example), are considered to be disabled from the point that they are diagnosed.

Q70. Do you consider yourself to be disabled as set out in the Equality Act 2010?

Select **one** option only.

Yes

No

I prefer not to say

Question 70a. If you answered ‘Yes’ above, please tell us the type of impairment that applies:

*You may have more than one type of impairment, so please tick **all** that apply. If none of these applies to you, please select ‘Other’, and give brief details of the impairment you have.*

<input type="checkbox"/>

Physical impairment

Sensory impairment (hearing, sight or both)

Longstanding illness or health condition, or epilepsy

Mental health condition

Learning disability

I prefer not to say

Other

If you selected Other, please specify:

Q71. Do you regard yourself as belonging to a particular religion or belief?

Select **one** option only.

Yes

No

I prefer not to say

Q71a. If you answered 'Yes' above, which of the following applies to you? Select **one** option only.

Christian

Buddhist

Hindu

Jewish

Muslim

Sikh

Other

I prefer not to say

If you selected Other, please specify:

Q72. Are you...? Select **one** option only.

Heterosexual/Straight

Bi/Bisexual

Gay woman/Lesbian

Gay man

Other

I prefer not to say

If you selected Other, please specify:

Who are we?

Kent County Council collects, uses and is responsible for certain personal information about you. When we do so we are regulated under the General Data Protection Regulation which applies across the European Union (including in the United Kingdom) and we are responsible as 'controller' of that personal information for the purposes of those laws. Our Data Protection Officer is Benjamin Watts.

The personal information we collect and use

Information collected by us

In the course of responding to Consultations published by Kent County Council we collect the following personal information when you provide it to us:

- Postcode
- Email address if you want updates on a consultation
- Feedback on the consultation
- Equalities Data - Ethnicity, Religion, Sexuality, Gender Reassignment, Disability or if you are a Carer
- Cookies – we use three types of cookies when you use our website. For more information about the cookies and how they are used please visit <https://kahootz.deskpro.com/kb/articles/kahootz-cookie-information-ci>

We use cookies to remember who you are and a few of your preferences whilst you use the website.

We do not use cookies to collect personally identifiable information about you, track your behaviour or share information with 3rd parties.

Our cookies do not contain any of your personal information and only take up about one-thousandth of the space of a single image from a typical digital camera.

All of the cookies we set are strictly necessary in order for us to provide the online service to you.

You do not need to submit any equalities information if you do not want to. KCC is committed to the principle that all our customers have the right to equality and fairness in the way they are treated and in the services that they receive. Any information you do give will be used to see if there are any differences in views for different groups of people, and to check if services are being delivered in a fair and reasonable way. No personal information which can identify you, such as your name or address, will be used in producing equality reports. We will follow our Data Protection policies to keep your information secure and confidential. Your equality data will be anonymised before sent to other teams.

How we use your personal information

We use your personal information to inform you of the outcome of the consultation, if you have requested updates.

We may use your postcode to carry out a type of profiling to estimate which one of a number of lifestyle groups you are most likely to fall into. We do this using geodemographic segmentation tools. We do not make any decisions about individual service users based solely on automated processing, including profiling.

How long your personal data will be kept

We will hold your personal information for up to 6 years following the closure of a consultation.

Reasons we can collect and use your personal information

We rely on *'processing is necessary for the performance of a task carried out in the public interest'*

And *'processing is necessary for compliance with a legal obligation to which the controller is subject.'*

The provision of contact details, including name, address or email address is required from you to enable us to respond to your feedback on consultations.

We rely on *processing is necessary for reasons of substantial public interest* as the lawful basis on which we collect and use your special category data for the purpose of equalities monitoring.

Further, the processing is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people with the view to enabling such equality to be promoted or maintained.

You can read KCC's Equality Policy on our website <http://www.kent.gov.uk/about-the-council/strategies-and-policies/corporate-policies/equality-and-diversity>

Who we share your personal information with

Kent County Council are hosting this consultation on behalf of the Kent Downs AONB Unit services. We may share your personal data and feedback with the Kent Down AONB Unit who may need to respond to your feedback. In some cases that may include your name and contact details if provided.

We will share personal information with law enforcement or other authorities if required by applicable law.

We use a system to log your feedback, which is provided by a third-party supplier.

Your Rights

Under the GDPR you have a number of rights which you can access free of charge which allow you to:

- Know what we are doing with your information and why we are doing it
- Ask to see what information we hold about you
- Ask us to correct any mistakes in the information we hold about you
- Object to direct marketing
- Make a complaint to the Information Commissioners Office

Depending on our reason for using your information you may also be entitled to:

- Ask us to delete information we hold about you
- Have your information transferred electronically to yourself or to another organisation
- Object to decisions being made that significantly affect you
- Object to how we are using your information
- Stop us using your information in certain ways

We will always seek to comply with your request however we may be required to hold or use your information to comply with legal duties. Please note: your request may delay or prevent us delivering a service to you.

For further information about your rights, including the circumstances in which they apply, see the guidance from the UK Information Commissioners Office (ICO) on individuals' rights under the General Data Protection Regulation.

If you would like to exercise a right, please contact the Information Resilience and Transparency Team at data.protection@kent.gov.uk.

Keeping your personal information secure

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Who to Contact

Please contact the Information Resilience and Transparency Team at data.protection@kent.gov.uk to exercise any of your rights, or if you have a complaint about why your information has been collected, how it has been used or how long we have kept it for.

You can contact our Data Protection Officer, Benjamin Watts, at dpo@kent.gov.uk. Or write to Data Protection Officer, Kent County Council, Sessions House, Maidstone, Kent, ME14 1XQ.

The General Data Protection Regulation also gives you right to lodge a complaint with a supervisory authority. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone 03031 231113.

For further information visit <https://www.kent.gov.uk/about-the-council/about-the-website/privacy-statement>

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