

Kent Downs AONB Management Plan Review General Comments

These comments, received from Kent County Council Teams, relate to parts of the Plan **outside** of the Character Components Section.

FRNE (RC)

There needs to be very careful use of language around landscape as so often words and their meaning are misapplied or misunderstood. The heading 'Landform & Landscape Character' – I think it would be better to put landform with geology as the two are so closely linked.

Landscape Character then might be better placed at the end of the document. Ultimately the Kent Downs' character is made up of the Components. And character in its own right isn't a component – character is the end result – the natural beauty that people see and experience, which is explained in the Plan, by breaking that character down into 'components'.

Landscape Character in a LCA sense is descriptive and doesn't systematically identify components. The dual component and character-led approaches are confusing – and could make it difficult to apply in terms of planning. Getting this distinction clearer could help users of the Plan understand better which part of landscape they're involved in and could have ownership of.

General comments regarding the Plan;

- Separation of opportunities, issues and threats under separate headings would make it much clearer, some are obvious but others not so.
- Policies are often quite wordy with long sentences this makes their ultimate meaning difficult to grasp, could be more succinct.
- Sometimes the threats and issues aren't then addressed in the policies. Is there potential to demonstrate better links between identified problems and a way of targeting that problem?

Heritage Conservation (LD)

1.2.1 The Components of natural beauty.

The text rightly identifies the strong 'time-depth' to the Kent Downs and the main heritage asset types that contribute to it. To prioritise conservation needs and resource allocation it is necessary to first understand the historic landscape better. The Kent Historic Landscape Characterisation (2001) can play an important role in this. The existing HLC has identified the broad character of the historic landscape of the Kent Downs. To be fully effective in policy, local

planning and development control, the broad scale Historic Landscape Characterisation should be backed up by more detailed case-by-case analysis, to add greater detail through secondary sources.

2.2.4 The role of the Kent Downs AONB partnership.

It would be helpful to know how the historic environment is represented on the JAC.

FRNE (HF)

There is a need to ensure that it is clear what the issues, opportunities and threats are. Currently they are all included in one section.

PRoW (CF)

I welcome the inclusion of the section referencing the above mentioned Improvement Plan which demonstrates the clear correlation.

I also welcome the very relevant reference to the "England Coast Path" within the section on Coastal Access, although it may be appropriate to mention it by its title and that it will provide a Coastal Access margin on the seaward side of the trail, similar to "Open Access" land. This will arguably provide significantly more access than the trail itself.

Finally, a meeting with the AONB Team would be beneficial once the plan policies are adopted to identify specific projects where joint working would assist delivery.

FRNE (WM)

Under Implementation, monitoring & review it would be worth monitoring LWSs under positive conservation management annually.

Management of the AONB

No comments were received regarding this section of the Plan.

Landform & Landscape Character

Team	Vision/Overview	Issues, Opportunities & Intro	Aims	Policies
FRNE RC	3.1.1 Talks about	b) Remove 'in certain landscape		LLC1 – takes a component-led and
	'components' but these are	character areas'.		character-led approach. It's confusing to
	different to components of			use both!
	character – suggest re-			"The protection, conservation and
	wording to avoid confusion.			enhancement of natural beauty
				components, the historic character they
				create and the setting of the Kent Downs
				AONB will be supported and pursued."
FRNE (RC)				LLC7 – What's the difference between
				landscape character areas and local
				character areas? It's confusing, suggest
				sticking to one.
FRNE (RC)	In my view, landscape			LLC8 – Suggest removing 'landscape
	character as a component of			character' as per earlier comments.
	natural beauty – it is the			
	result of the combination of			
	components that delivers a			
	unique Downs character –			
	it's the result not one of the			
	elements.			
Minerals &		3.1.3 a) There is nothing in Section		There is nothing in Section 2 that provides
Waste (JP)		2 that provides any justification or		any justification or context about the role
		context about the role of the AONB		of the AONB management plan outside
		management plan outside the		the designated area. Moreover, there is
		designated area.		nothing in the earlier in section 3.1 which
		3.1.3 e) The way that this is		provides any context for the importance
		worded, it is neither a main issue,		of views into or out of the AONB.
		an opportunity, nor a threat. As		
		3.1.3 a deals with the perceived		Furthermore, it would be much more
		threat, this clause needs to be		positive and specific if this policy were to

		written to establish the main issues	include measures to work with local
		or opportunities which are probably	planning authorities to develop planning
		the same. I would suggest the	policies that seek to protect the setting of
		following alternative wording:	the Kent Downs and views in out of the
			AONB.
		The opportunity to work with Local	
		Planning Authorities to develop	
		planning policy protection to the	
		setting of the Kent Downs and to	
		ensure that consideration of the	
		setting of the Kent Downs is taken	
		into account when Local Planning	
		authorities determine planning	
		applications.	
Heritage	A critical element in		
Conservation	landscape character is the		
LD	historic aspect of this		
	character. Although		
	Landscape Character		
	Assessment is a useful start		
	point it cannot assess		
	historic aspects of the		
	landscape in enough detail		
	to be useful for		
	understanding significance.		
	Our comments in relation to		
	1.2.1 above also apply to this		
	section (see General		
	Comments).		

Biodiversity

Team	Vision/Overview	Issues, Opportunities & Intro	Aims	Policies
FRNE – RC	Suggest 'Recognise and support the importance of the Kent Downs landscape to biodiversity.' Also suggest written in a way which explains that the unique landscape of the Downs has habitats (created and managed by people over millennia) which support a distinctive biodiversity. E.g. "the special components of natural beauty support the Kent Downs' rich and distinctive biodiversity." 3.2.1 The sentence 'rare arable field wild flowers' is stated twice.	A) Could this be linked to landscape condition decline? Ultimately it's the same thing. C) Lack of awareness of the links between landscape condition, management and biodiversity. g) Kent Downs <i>Landscape</i> is sensitive to climate change, causing impacts upon biodiversity		BD1 – GI and connectivity should be informed by and reinforce/restore landscape character.
FRNE – LM		It may be worth reviewing the condition statements and risks in line with what was reported in the KHS analysis.		The biodiversity chapter recognises the issue of climate change on the ecology of the AONB and notes the UK Climate Change Risk Assessment has identified key risks to Kent Downs' biodiversity but there doesn't seem to be an explicit policy to address these risks; nor is it tackled within a policy. I wonder if there should be something included to address these risks.
FRNE -	3.2.3 - it's not clear what is	Opportunity – It should not just be	It's not clear how the aims will be	3
HF	an issue, opportunity and threat – they should be	large scale projects to secure the biodiversity objectives . There	achieved. Ideally they should have clear targets attached to them or how	

	separate bullet points	should be ways to encourage LPAs to get applicants to incorporate enhancements/landscaping plans which link in to the aims of the KD	information about how they should be measured.	
		management plan.		
FRNE	The vision should be more	- I would be advantageous to pay		- Include something around actively
WM	modest. Although there has	special attention to LWSs as they are		engaging with the LNP and contributing
	been an increase in some	an important component in		towards their targets
	habitats (chalk grassland),	conservation at landscape scale and		
	can you really say that there	are highlighted in the White Paper		
	as been a net gain in	and Lawton Review- as well as being		
	biodiversity (incl species)	one of Defra's SDL indicators.		
	across the downs??	- Another main issue: change in		
	If so, please provide or point	farming practices? Polytunnels		
	to the evidence			

Farmed Landscape

Team	Vision/Overview	Issues, Opportunities & Intro	Aims	Policies
FRNE (RC)	Farming creates the character of the landscape, shaping its natural beauty.		4) "And sustainable food"	
Heritage Conservation (LD)		Add comment on farm buildings being the category of historic buildings which are most at risk – cf Kent Farmsteads Guidance. Add the problem of the loss of historic farm buildings/historic character of farmsteads as an	Again add reference to enhancing and conserving historic character of farmsteads and securing sustainable reuse of farm buildings which are unsuitable for modern agricultural practices.	Add policy of conserving and enhancing historic character of farmsteads and promoting sustainable re-use of farm buildings no longer suitable for agricultural purposes. FL11 – replace archaeology with historic
		issue/threat.		environment.
FRNE HF	Need to be a clear distinction in the main issues, opportunities and Threats		Why does the page include the following quote: The Kent Downs AONB is principally a farmed landscape, with 74% of its land classed as agricultural. It's not an aim and it's been included elsewhere in the document.	

Woodland & Trees

Vision/Overview	Issues, Opportunities & Intro	Aims	Policies
	Deer - could they be a potential threat in the future?	2) "It is recognised that"	
	Should the legend explanation for fig 10 last entry for H91EO say 'and ash'? The text does not at present make any mention of the role that woodlands have played in the historic development of the Kent Downs, not of the wealth of historic features that survive within woodlands. We would suggest that an issue be added: p. Woodlands contain a wealth of historic features both related to historic woodland management practices and other historic processes. There is a need to ensure that they are conserved during woodland management operations. This will be significantly helped by the work that the Weald Forest Ridge project carried out and the products (cab-cards and guidance) they generated. The Woodland Archaeology Forum will also play a significant role and we would	Add to 4. – 'and taken into account in management plans'.	Add a policy or amend one of the existing to reflect need to manage woodlands in a way which conserves and enhances the historic environment – particularly in relation to felling and coppicing activities which are likely to have greatest impact.
•	/ision/Overview	Deer - could they be a potential threat in the future? Should the legend explanation for fig 10 last entry for H91EO say 'and ash'? The text does not at present make any mention of the role that woodlands have played in the historic development of the Kent Downs, not of the wealth of historic features that survive within woodlands. We would suggest that an issue be added: p. Woodlands contain a wealth of historic features both related to historic woodland management practices and other historic processes. There is a need to ensure that they are conserved during woodland management operations. This will be significantly helped by the work that the Weald Forest Ridge project carried out and the products (cab-cards and guidance) they generated. The Woodland Archaeology Forum will also play a	Deer - could they be a potential threat in the future? Should the legend explanation for fig 10 last entry for H91EO say 'and ash'? The text does not at present make any mention of the role that woodlands have played in the historic development of the Kent Downs, not of the wealth of historic features that survive within woodlands. We would suggest that an issue be added: p. Woodlands contain a wealth of historic features both related to historic woodland management practices and other historic processes. There is a need to ensure that they are conserved during woodland management operations. This will be significantly helped by the work that the Weald Forest Ridge project carried out and the products (cab-cards and guidance) they generated. The Woodland Archaeology Forum will also play a significant role and we would encourage the AONB team to

		the WFR project began.		
FRNE (LM)				For woodlands and trees chapter, in the introduction it talks about ash dieback but doesn't specifically refer to it in the main issues/threats section - given the potential for this disease to significantly change the wooded landscape of the AONB should it not be specifically mentioned? Otherwise it could be viewed as an oversight. Should there also be a coordinating policy which links to this?
FRNE (WM)	Table 7. What's "assumed woodland"? What's the point of including this? Please stick to recognised land/habitat class/use descriptions	 Include tree pests, diseases & disorders a main issue. i.e Chalara. Include new approach to creating plantations as a way to adapt to climate change- avoid single tree plantation in favour of a 'mixed' tree stands where economically viable. 	Under sustainable management, there should be something about tackling the increasing tree pests, diseases and disorders problem through appropriate monitoring and tree management	

Cultural Heritage

Team	Vision/Overview	Issues, Opportunities & Intro	Aims	Policies
FRNE (RC)	Historic and cultural		Integrating heritage	
	heritage. Suggest		understanding into wider	
	removing 'historic' as		decision-making.	
	heritage states all that is			
	needed in the title. P58 –			
	Map could be a			
	clearerspots aren't			
	distinguishable.			
Heritage	Our Vision: I would	b. Add damage to archaeological features caused	1. The text currently limits	HCH1 We suggest that this policy,
Conservation	suggest that the first	by motorcycle and other illegal off road vehicles,	itself to "the principal	which underpins all the others,
(LD)	sentence be replaced by	and also by inappropriate woodland management	components of the historic	could be presented in a more
	"In 2034the rich heritage	techniques.	character of Kent". We do not see	definitive form? We suggest
	of historic landscape,	c. One way of recognising and reinforcing the	any particular advantage to	"Activities will be pursued where
	buildings, settlements and	special landscape character of the AONB is to	limiting the aim in this way and	they protect, conserve and enhance
	sites" and also that the	carry out formal assessments of key assets and	would suggest that the text be re-	the historic character of the Kent
	phrase "reflect their local	then try to secure their protection through Local	phrased such that the first	Downs."
	character" be replaced by	Listing. The High Weald AONB team have recently	sentence begins "The historic	
	"reflect their local	participated in a review of the parks and gardens	character of the Kent Downs	HCH2 We suggest the phrase
	character and	of Tunbridge Wells Borough that may act as a	landscapeis recognised, valued,	"inspiration from" be replaced with
	significance".	model for how thematic research can be carried	conserved and enhanced." We	"importance of" as this is perhaps
	Table 8 – contains two	out in a way that uses both professionals and	would also suggest that this	easier to understand. Any
	lines for 'Registered Parks	community groups (in this case the Kent Gardens	paragraph needs to say who the	inspirational aspect will fit within
	and Gardens at Risk'.	Trust) and which produces high quality	target audience is for this aim –	the definition of "importance".
	Presumably the first line	information suitable for HERs and land	presumably residents,	
	should be 'Registered	management purposes. If supported by local	stakeholders and visitors?	As mentioned above an enhanced
	Parks and Gardens'.	authorities and integrated into HERs and local		historic landscape character
		planning policies, including local lists, this can be	We think the phrase "and actively	assessment will be an essential
	'Total Number of Heritage	an effective and flexible way to understand and	supported" is somewhat vague.	contributor to this wider
	Assets'. The number	conserve the heritage of the AONB. We would be	What does 'active support' mean	understanding.
	presented for this	happy to work with the AONB team on initiatives	in this context?	

category at present is simply the number of Grade I and II* listed buildings, Scheduled Monuments and Registered Parks and Gardens added together. This is incorrect. Heritage assets include heritage sites of all types and periods, whether designated or not. The Kent HER contains more than 11,000 heritage records in the Kent Downs AONB (plus any from the London Borough of Bromley). These include both designated and nondesignated assets. The non-designated assets include buildings such as farmhouses, pillboxes and oast houses and archaeological sites such as Roman villas, prehistoric monuments and moated manor houses. There is in fact no real point in trying to present the number of Heritage Assets as they are being identified all the of this kind.

- c. The Farmsteads guidance recently produced by English Heritage, KCC and the Kent Downs and High Weald AONBs will be an important tool to show how historic farmsteads in Kent can be assessed for their suitability for new development or change of use. It is intended that the guidance is adopted by land management authorities as part of their policies and development control functions. Where such development is permitted it is important that it is in keeping with the existing character in terms of size, layout, massing and materials and that any archaeological remains associated with former phases of use are treated appropriately in the development control process.
- c. Targets related to this issue should also include i) use of and access to traditional building materials and ii) encouraging small scale extraction of local stone for repair to historic buildings.
- e. Another threat to both above and below ground heritage assets comes from changing water levels in the ground. As the introduction makes clear the AONB provides a large proportion of Kent's drinking water and this, together with climate change and the introduction of SuDS schemes, risks altering the moisture level in the ground. This can have a very harmful effect on archaeological sites and so the needs of the heritage must be taken into account when

Add aim of providing sources of traditional building materials.

HCH4 We suggest the second bullet point be changed to "be complementary to the existing character in form, setting, scale and use of materials".

HCH6 It should be noted that in 2008 (revised in 2012) English Heritage produced guidance "Climate Change and the Historic Environment" that will be useful for helping produce the guidance referred to. As mentioned above KCC is also producing guidance for those developing SuDS schemes that will help them incorporate the needs of the historic environment.

Add policy of encouraging smallscale extraction to provide sources of traditional building materials. time. I would suggest deleting the 'Total Number of Heritage Assets' lines from the table and adding a statement in the text that in addition to the many designated heritage assets the Kent Downs contains many thousands of non-designated heritage assets that contribute strongly to the character and identify of the AONB.

3.5.1 In terms of the 'time depth' referred to in this paragraph please see my comments under 1.2.1 above.

The term 'standing stones' is inappropriate in this context as it refers to freestanding stones such as monoliths and stone circles which are so far unrecognised in Kent – could change to 'megalithic burial monuments and structures'. Add 'earthen' in front of long barrows and remove 'particularly'

planning any developments or works that could affect moisture levels. KCC is in the process of developing guidance for SuDS developers to help them manage the impact of their schemes on the historic environment more effectively.

KCC is also working with Kent Police to develop a methodology for assessing the potential for heritage crime and defining actions to reduce it. We would encourage the AONB team to support such an initiative and would be happy to discuss the matter further.

f. In terms of First and Second World War projects we wonder if the AONB team are aware of a number of umbrella groups that have been set up in Kent to help share information on relevant projects.

- First World War Kent. A steering group set up for museums and other heritage organisations across Kent to co-ordinate the First World War commemorations through next four years. This involves a wide number of organisations and has established three specific working groups so far:
 - Marketing & PR Working Group

 have established a calendar of events and have established a
 Blog http://fwwkentmedway.wordpr

 ess.com/calendar/

	nd 'Medway and'.	 Research Working Group – 	
Th	nis section should discuss	focusing on research including	
th	e onset of small scale	producing a timeline for the	
w	oodland clearance in the	county that links to the Imperial	
Ne	eolithic and the	War Museum national one. The	
int	tensification of	timeline is being led by KCC	
cle	earance and changes to	libraries.	
laı	ndscape organisation in	Kent Education Working Group	
th	e later prehistoric	– led by Lyn Palmer of	
pe	eriod.	Maidstone Museum. Group	
Al:	though the text states	focuses only on the education	
со	orrectly that Kent was	aspects of the First World War.	
pr	obably the scene of the	Only met once.	
Ro	oman invasion in AD 43 it	We are sure that the AONB team would find it	
sh	nould be noted that Kent	useful to join these groups if it develops First or	
	as also the location of	Second World War projects.	
th	e earlier raids by Julius	Although the issues a) to g) capture the major	
Ca	aesar of 55 and 54 BC.	opportunities and threats We would suggest that	
		an additional issue should be the promotion of the	
	the paragraph	historic nature of the AONB to its residents and	
be	eginning 'The commons	visitors. For the heritage of the AONB to play a full	
	'minnises'' it would	role it must be known, understood and enjoyed by	
1 -	obably be better to	the public, not just the decision-makers (which is	
	place 'Saxon' with	the audience for understanding as currently	
	inglo-Saxon' as this is	stated in a) and c)).	
	cognised as a term		
	ncompassing all the early		
	ermanic groups who		
	ettled in England.		
	The development of		
	ban forms and defences		
	the Roman period		
sh	nould be mentioned.		<u> </u>

We would be happy to		
advise further on the text		
of this section.		
Fig 12 – the buildings key		
is hard to distinguish and		
also may contain		
overlapping categories.		

General Comments:

Heritage Conservation (LD)

We were pleased to see such importance accorded to Historic Landscape Characterisation as a method of understanding and mapping the development of the AONB's historic environment. The text is right to say that the Kent HLC was one of the first county surveys but this has disadvantages. The method used in more recent HLCs is much more detailed than the Kent approach and has significantly greater potential as a research and interpretive tool. To offer more than broad brush guidance the Kent HLC needs to be refined so that greater detail and resolution can be added. We would recommend that the Kent Downs AONB team engage on such a project as has been done in parts of the High Weald AONB area. We would be happy to discuss such a project further.

Geology & Natural Resources

Team	Vision/Overview	Issues, Opportunities & Intro	Aims	Policies
Minerals & Waste JP				GNR3: This policy does not comply with the NPPF and the phrase in the first sentence, "and its setting" should be removed. Paragraph 115 of the NPPF only refers to giving great weight to conserving landscape and scenic beauty in AONBs. Draft Policy SDT5 in section, Sustainable Policies adequately describes a methodology relating to developments that are in the setting of the AONB and this policy does not require the additional consideration of exceptional circumstances. The phrase, "in the national interest" should be removed from the second sentence as it is not in the best interest of the AONB. Paragraph 116 of the NPPF includes three considerations which should be taken into account when determining an application in designated areas and national interest is only one of them. The other two are: (i) the cost and scope of developing outside the designated area or meeting the need in some other way; (ii) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated. Both of these two other considerations could also be important reasons for
FRNE (RC)	Purple quote "Kent Downs landscape provides vital services to the population of Kent & beyond." Personally I would put tranquillity in with enjoyment – as it's an experiential thing and is related to people's impact upon the landscape.			not developing in the AONB.

Heritage Conservation (LD)	Add drift deposits of Pleistocene gravel containing important Palaeolithic remains.	Add Promote small-scale extraction for traditional building materials.
Planning Strategy (BG)		There is the current ongoing debate over oil/gas exploration and the use of 'fracking' but much less likely that in the Wealden Formation areas and also the Chalk is still potentially a strategic resource for cement manufacture on an industrial scale.
Heritage Conservation (AC)		Small quarries may need to be opened for specific historic building repairs, to a church or a historic building. These are not like commercial quarries but allow local stone to be won for a specific repair projects, for a limited time period only and for very small quantities of stone.

Heritage Coast

Team	Vision/Overview	Issues, Opportunities &	Aims	Policies
		Intro		
FRNE (CD)	This is a comprehensive overview of the area, which takes useful information from the NOSTRA pilot SCA for Dover Strait (http://www.nostraproject.eu/News/NOSTRA-Workshop-n-1-Seascapes-Report-Available) and is up to date in terms of programming under the Marine and Coastal Access Act 2009 (but see MCZ comments to the right)	Potential MCZ designation is mentioned as "thought to be likely to have a negative impact on local fishing communities." This is quite a leading statement. While for inshore sites such as Hythe Bay (just outside the AONB area) there is a lot of concern from local fishermen about the type of conservation management measures which will be	We support the collaborative approach and hope to continue to contribute through collaborative working with Pas-de-Calais and Dover Strait stakeholders.	Same as left.

implemented (if it becomes an	
MCZ); the site will not be a "no	
take zone" and KCC is	
supportive of MCZ	
designations, while	
recommending that "when	
Natural England carries out	
work identifying conservation	
measures for the new MCZ's in	
2014, that Hythe Bay receives a	
comprehensive assessment of	
trawling and full engagement	
of the local fishing fleet to	
determine management	
measures." Two other MCZ's	
may be designated within the	
Heritage Coasts in the coming	
years (Dover area) and KCC	
would take the same position.	
Maybe the section should be	
rewritten as	
"Proposed Marine Conservation	
Zones, while protecting wildlife,	
will impact on local fishing	
communities and management	
measures need to be carefully	
considered to avoid	
unnecessary disruption of	
livelihoods. " KCC completed a	
response to "Marine	
Conservation Zones:	
Consultation on proposals for	
designation in 2013" which can	

		be made available.	
Heritage	In the paragraph beginning "Arising from		
Conservation	conflict and seagoing transport" mention		
(LD)	might usefully be made of the Dover Boat that		
	was found in Dover in 1992 and which		
	remains the oldest sea-going boat in the		
	world.		

Vibrant Communities

No comments were received regarding this section of the Plan.

Sustainable Development

Team	Vision/Overview	Issues, Opportunities &	Aims	Policies
		Intro		
Minerals				SDT5: This policy would be much
& Waste				more positive and specific if it
(JP)				were to include measures to work
				with local planning authorities to
				develop planning policies that seek
				to protect the setting of the Kent
				Downs and views in out of the
				AONB.
FRNE			Integrated decision making is	
(RC)			needed to achieve sustainable	
			development – considering social,	
			economic and environmental	
			issues together – as set out in the	
			NPPF. This sort of decision making	
			in the AONB should be an aim.	
Transport	Page 89 - refers to the Local Transport Plan for			

Planning	Kent 2006-11. This is now out of date and has		
(JR)	been replace by the Local Transport Plan for Kent		
	2011-16. This can be accessed at		
	https://shareweb.kent.gov.uk/Documents/roads-		
	and-transport/road-policies/local-transport-plan-		
	3/final-ltp3.pdf		
	It also refers to Medway's Local Transport Plan		
	2006-11. I presume Medway Council also has an		
	in date new Local Transport Plan, although it		
	would be best to check with them.		
	This paragraph may need to be re-written to		
	correspond with the aims of the current Local		
	Transport Plans and whether they think this		
	supports the AONB aims for sustainable travel. I		
	can't speak for Medway, but the Local Transport		
	Plan for Kent 2011-16 (LTP3) objectives of safer		
	roads, protecting communities, active transport,		
	supporting independence for all, reducing		
	emissions, smarter travel, accessing life's		
	opportunities, enjoying the journey, sociable		
	streets and protecting Kent's natural and man-		
	made environment (page 45 of LTP3) all seem to		
	support the AONB aims.		
	Page 89 sets the context for transport		
	infrastructure challenges that affect the AONB. It		
	may be useful to add in the significance of flows		
	along the M20/A20 and M2/A2 corridors to and		
	from the Channel Ports (Channel Tunnel and Port		
	of Dover). With cross channel traffic forecast to		
	increase, it will add further pressures on these		
	transport corridors which pass adjacent to or at		
	the edge of the AONB. HGV traffic to and from		

the ports creates problems such as Operation		
Stack when the ports are temporarily closed and		
the ongoing problem of overnight lorry parking in		
lay-bys etc. Solutions to both Operational Stack		
and overnight lorry parking are being actively		
pursued by Kent County Council.		

Access, Enjoyment & Understanding

Team	Vision/Overview	Issues, Opportunities & Intro	Aims	Policies
Transport Planning (JR)	Page 96 - 'Road Users' states that there have been significant reductions in the number of walking and cycling trips surveyed. The data that is referred to is from Urban Cordon Counts (entering an urban area) over a single 12 hour period; therefore I think it is misleading to quote this "trend" for walking and cycling in a document about an AONB when the data refers to urban areas.			
PRoW (CF)		Cycling: I believe there is an omission by not referencing the "Pilgrims Cycle Trail" between Rochester and Canterbury Cathedrals. The route provides an arterial route right through the heart of the Downs AONB.		Policies AEU4, 5, 6 and 10 support the theme 'Well Maintained Countryside Access' in the Countryside and Coast Access Improvement Plan (CCAIP).'

PRoW	Policy AEU2 supports the Growth and
(CF)	Development theme of the CCAIP.
PRoW	AEU3, AEU7, AEU12, support 'A more
(CF)	sensible network' theme of the CCAIP.
PRoW	AEU1, AEU8, support the 'knowing what's
(CF)	out there' theme of the CCAIP.
PRoW	AEU9 supports the Education and respect
(CF)	for the countryside theme of the CCAIP.
PRoW	It would be useful if Policy AEU10 were
(CF)	extended to include the "England Coast
	Path" thereby covering the two National
	Trails through the Downs.
PRoW	Policy AEU4 – With the loss of the Open
(CF)	Access Management Grant from Natural
	England it is increasingly difficult to fund
	enhancements, let alone maintain, "Open
	Access". I would like to see this Policy
	significantly bolstered to try and include
	wording that would secure some of the
	highly valuable Landscape Grants that
	have been awarded from the National
	lottery. Although in some may covered by
	AEU8 it would assist the CAIP objectives if
	a co-ordinated plan were developed for
	the collective Access Land sites with a view
	to draw some of the honey pot visitors
	mentioned further East. This would
	support a number of opportunities and
	aims earlier identified in the plan.