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1. Introduction

This technical note responds to comments made by Natural England in their revised response (January 2026) to the *Regulation 18 consultation* on the *Sevenoaks Local Plan 2040* (October–December 2025). It specifically addresses comments which refer to the *Landscape and Visual Evidence* report (hereafter “the Study”) prepared by Arup (November 2024) and the proposed Pedham Place site allocation.

Natural England has set out several concerns in relation to the Study, including the scope of the assessment, the treatment of mitigation, the interpretation of baseline conditions, and the level of evidence supporting the conclusions. This note addresses these matters insofar as they relate to the Study and clarifies the scope, methodology and conclusions of the evidence.

The Study was prepared as a strategic evidence base to inform plan-making and provides a comparative assessment of three development scenarios, all of which lie within the Kent Downs National Landscape. Within this context, it identifies the likely effects of development on the qualities of the Kent Downs National Landscape, drawing on published landscape character assessments, National Landscape guidance, and site-specific analysis. It does not constitute a detailed, project-level Landscape and Visual Impact Assessment (LVIA), and its findings are appropriately framed at a strategic level.

The Study draws upon established guidance and evidence, including the Guidelines for Landscape and Visual Impact Assessment, third edition (GLVIA3), published landscape character assessments, and relevant national and local policy relating to National Landscapes. It is informed by site-specific analysis and applies a structured approach to the identification of likely landscape and visual effects.

This note draws solely on the existing evidence base and report findings and does not introduce new evidence or assessment. Its purpose is to assist the Council by clarifying how the Study should be interpreted within the plan-making context and to address the specific points raised by Natural England.

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2. Response to Natural England comments

This section addresses each of the concerns raised by Natural England in turn and is followed by an overall conclusion and recommended next steps for the Council.

2.1 Scope of assessment

“...it is currently unclear which of these options are likely to come forward, if such measures are capable of outweighing the potential harm caused by the development...” (Annex 3, p34)

This comment refers to the options for mitigation that may be applied to avoid or minimise the effects on the National Landscape. The Study did not make any assessment or recommendations regarding the planning balance or assess whether mitigation would outweigh harm. It identifies potential effects and how these may be influenced at a strategic level, with any judgement on the acceptability of effects to be determined through subsequent stages of assessment and decision-making.

2.2 Sufficiency of evidence and need for further work

“...we do not currently feel that there is sufficient justification... and therefore advise that more evidence is provided...” (Annex 3 p35)

The Study provides a proportionate level of evidence appropriate to this early stage of plan-making. It establishes an understanding of the key landscape sensitivities, receptors, and the nature of likely effects sufficient to support the comparative appraisal of options. The level of detail reflects the early stage of the process and the absence of fixed design parameters. The study makes it clear that further work, including detailed design development and project-level LVIA, will be required to refine the assessment, quantify effects, and test mitigation as the proposals evolve.

2.3 Relative performance of options

“...causing less harm than other options does not justify the adverse impacts that are likely to occur...” (Annex 3 p35)

The effects each option, including for the proposed Pedham Place allocation, were assessed independently. This includes consideration of landscape character, visual receptors, and the likely nature of change, based on broadly defined development scenarios. Each site was therefore assessed on its own merits based on assumed parameters and principles. The Study then undertook a comparative exercise to distinguish between the relative landscape and visual performance of the three options considered. This comparison is separate from, and did not influence, the identification of effects for any individual option. The identification of Pedham Place as the option which is considered to represent the least potential for harm overall reflects this comparison of independently derived findings. It was intended to assist the Council in selecting options to take forward into the new Local Plan. It does not disregard the need for development proposals to further assess or justify the adverse effects identified or to apply the mitigation hierarchy in seeking to avoid or minimise these effects.

2.4 Role of mitigation in the assessment

“...we have concerns about this being reduced to Low-Medium with the additional mitigation measures... it does not appear that the impacts can be avoided or fully mitigated.” (Annex 3 p36)

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The Study identifies potential mitigation and enhancement measures and considers their likely influence at a strategic level, consistent with its role in informing plan-making. The conclusions are conditional, reflecting a scenario in which mitigation is embedded within development proposals. The reported reductions in effect (e.g. to Low-Medium in the case of Pedham Place) were derived through the assessment undertaken at this strategic stage with the level of available information at the time, based on a defined development scenario incorporating embedded mitigation and potential enhancement measures. The influence of these measures was considered as part of the assessment of likely effects, rather than applied retrospectively. This is consistent with the approach advocated in GLVIA3. Detailed design and project level LVIA are required to confirm the effectiveness of mitigation and the resulting level of residual impact.

2.5 Limitations of mitigation

“...there are some effects that it would not be possible to mitigate for, with potential for substantial effects on landscape character...” (Annex 3 p35)

The Study acknowledges that certain effects cannot be fully mitigated. The purpose of the assessment was to identify the likely extent and nature of effects rather than to demonstrate complete avoidance or mitigation. This reflects constraints such as the scale of proposed change, the openness and exposure of parts of the site within the wider landscape, and the sensitivity of key views and landscape character.

2.6 Role of baseline conditions and existing detractors

“Existing harm does not give grounds for additional harm...” (Annex 3 p36)

The Study does not conclude that existing detractors justify additional harm and furthermore acknowledges that exceptional circumstances would need to be demonstrated if harm to the National Landscape is identified. Existing features such as major infrastructure, fragmented field patterns, existing structures, unnatural topography, levels of activity and visually intrusive uses are identified as part of the baseline because this is the reality of what exists on the site today. This has informed an objective understanding of landscape character, value and susceptibility to change. The assessment identifies opportunities for restoration and enhancement, including measures to remove or reduce the influence of existing detractors, for example through undergrounding existing pylon lines, introducing new public right of way connection(s), reinforcing landscape structure and woodland management. These measures are identified to inform mitigation and enhancement strategies, rather than to justify the acceptability of further harm or disregard the sensitivity of the National Landscape.

2.7 Contribution to special qualities of the National Landscape

“...The site currently contributes to the natural beauty of the Kent Downs National Landscape and its special qualities...” (Annex 3 p37)

The Study recognises that the site lies within the National Landscape and that development has the potential to affect the natural beauty and special qualities of the designated area, including changes to openness, visual prominence within the landscape, and perception of rural character. It also identifies opportunities for mitigation and enhancement, including:

- Woodland planting

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- Management and restoration of tree planting
- Strengthening of existing field boundaries
- Landform and siting of development to reduce visibility
- Ecological and biodiversity enhancements
- Reduction and integration of existing detractors

These opportunities would need to be tested through subsequent stages of design, including parameter plans, detailed design, project-level LVIA and management plans to confirm their effectiveness and to identify resulting residual effects.

3. Conclusion

Overall, the Study provides a proportionate and robust strategic assessment based on the information available at the time. It is intended to inform plan-making, establishing the likely nature of landscape and visual effects and enabling a clear comparison of the options being considered by the Council to address unmet housing need. The responses above seek to clarify the scope, methodology and assumptions underpinning the assessment, including the role of mitigation and the conditional nature of conclusions at this stage. Further detailed work will be required to refine and validate these findings as proposals evolve; however, the current assessment provides an appropriate and evidence-based foundation for option selection within the plan-making process.

DOCUMENT CHECKING

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