

THE LONDON RESORT

The London Resort Development Consent Order

BC080001

Environmental Statement Volume 2: Appendices

Appendix 11.4 Consultee Responses to the 2020 EIA Scoping Report

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December 2020

Planning Act 2008
The Infrastructure Planning (Applications: Prescribed Forms and Procedure) Regulations 2009
Regulation 5(2)(a)
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017
Regulation 12(1)

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The London Resort ♦ EIA Scoping Opinion July 2020: reactions and responses

Consultee	PINS ID/Ref	Topic	Scoping comments	Project consultant's response
Landscape and visual impact assessment: EDP				
<i>Inspectorate's comments</i>				
	4.4.1	N/A	No matters have been proposed to be scoped out of the assessment.	Agreed
	4.4.2/10.82	Future scoping out	The Scoping Report states that further refinement of the scope to the Landscape and Visual impact assessment will take place. The Inspectorate refers the Applicant to paragraph 3.1.3 of this Opinion.	Further consultation with the relevant bodies to scope in/out elements has been carried out as appropriate.
	4.4.3/10.4-10.13, 10.61	Relevant guidance	The Scoping Report does not mention guidance such as the Landscape Institute and IEMA's Guidelines for Landscape and Visual Impact Assessment (3rd edition) (2013), Natural England's An Approach to Landscape Sensitivity Assessment (2019), Historic England's Understanding Place: Historic Area Assessments (2017), and Standards for Highways' DMRB – LA 104 Environmental Assessment and Monitoring (2019). The Applicant should make efforts to agree applicable guidance for the assessment with relevant consultation bodies.	<p>GLVIA3 is mentioned in para 10.61, whilst there is further detail within the baseline submitted and has been the main guidance adhered to throughout the assessment process. EDP have considered the other documents.</p> <p>Natural England's An Approach to Landscape Sensitivity Assessment (2019) is aimed at providing guidance to local authorities and other bodies preparing strategic level assessments and is not directly relevant to a project specific assessment.</p> <p>Historic England's Understanding Place: Historic Area Assessments (2017) is also aimed at strategic level assessments and is not directly relevant to a project specific assessment.</p> <p>DMRB – LA 104 – This has been considered as part of the assessment process.</p>
	4.4.4/10.21, Table 10.1, 3.17; 10.22; 10.53, Table 10.3	Consultation feedback 2014 – Locations of photoviewpoints and 3-D wireframe renderings	In response to the original 2014 Scoping, the Planning Inspectorate advised that efforts should be made to agree the location of viewpoints and photomontages with relevant consultation bodies. The Scoping Report identifies up to 50 representative Photoviewpoints and Night Photoviewpoints. The Inspectorate considers that appropriate viewpoints and photomontages should be included within the ES. The Applicant should make effort to agree the locations and number of viewpoints and photomontages applicable to the assessment with relevant consultation bodies.	<p>Viewpoints have been agreed with relevant consultation bodies.</p> <p>Additional viewpoints have been taken in late summer. Given the majority have worst case this is considered reasonable.</p> <p>Further consultation with GBC, DBC, TC and EDC has resulted in an additional 22 photoviewpoint locations.</p>
	4.4.5/10.21, Table 10.1, 3.18	Consultation feedback 2014 – Views from across the River Thames	The Scoping Report identifies up to 50 representative Photoviewpoints and Night Photoviewpoints. The Inspectorate considers that appropriate viewpoints and photomontages should be included within the ES. The Applicant should make effort to agree the locations and number of viewpoints and photomontages applicable to the assessment with relevant consultation bodies. However, the Inspectorate notes the lack of proposed viewpoints from Tilbury Docks and Tilbury itself facing west and south-west towards the Proposed Development. There are also no viewpoints from Gravesend on the south bank of the Thames facing north to the Proposed Development on the Essex Project Site. The Inspectorate considers that these viewpoints should be included in the ES.	<p>Viewpoints have been agreed in consultation with the relevant consultees. Viewpoints from Tilbury Docks and Tilbury itself facing west and south-west towards the Proposed Development and from Gravesend on the south bank of the Thames facing north to the Proposed Development on the Essex Project Site are included.</p> <p>Additional viewpoints can be taken in late summer but may need to be updated again with a 'winter scenario'. Given the majority have worst case this is considered reasonable.</p>

Consultee	PINS ID/Ref	Topic	Scoping comments	Project consultant's response
	4.4.6/10.21, Table 10.1, 3.19; 10.59 – 10.60	Consultation feedback 2014 – Effects on Green Belt	These sections of the Scoping Report consider potential effects on the metropolitan Green Belt by the southern boundary of the Proposed Development along the A2, concerns over which were raised in the 2014 Scoping by the Planning Inspectorate and Gravesham Borough Council. The Inspectorate does not consider that the Scoping Report provides a clear description of the likely impacts to the Green Belt or how they will be assessed in the ES. The ES should fully assess impacts to the Green Belt from the Proposed Development where significant effects are likely to occur.	Further consideration will be given (in landscape and visual terms) to the Green Belt within the ES.
	4.4.7/10.23, Table 10.2	Consultation feedback 2014 – Impacts on HS1	The Scoping Report does not mention the potential for visual impacts from the Proposed Development on the existing High Speed (HS) 1 infrastructure particularly receptors at Ebbsfleet Station. The Inspectorate consider that the ES should include an assessment of the impacts to these receptors where significant effects are likely to occur.	Impacts upon HS1 and the other rail networks passing near the DCO site is considered within the ES.
	4.4.8/10.23, Table 10.2	Consultation feedback 2014 – Seascapes	The Marine Management Organisation requested that 'seascapes' should be included in consideration of landscape and visual impacts. There is no specific consideration of this in the 2020 Scoping Report. Although located on the River Thames rather than the sea, part of the Proposed Development is situated within the Swanscombe Marine Conservation Zone, and the 'riverscape' of the Thames is very much part of its historic and contemporary experience. The ES should therefore include an assessment of impact to views from the river to the land and views along the river, cross-referenced with the heritage section as relevant.	A boat has been chartered to obtain 'river views' including 6 views along the Thames Reaches. The ES takes into account the published 'Reach Character Areas' (RCAs) which set out the character along the Thames.
	4.4.9/10.24	Search area	The Scoping Report refers to a 6km search area. Given the scale of the Proposed Development, the Inspectorate considers that this may not be sufficiently broad and should be increased. The Applicant should take care to ensure that the search area is sufficient and applicable to the extent of the likely impacts. For some receptors the range should be increased to up to 10km, in order to confirm the precise visual envelope where it is no longer possible to have views of the proposal. The ES should explain how the search area relates to the ZTV for the Proposed Development.	Further refinement of the ZTV has been undertaken (see Figure 11.9; Document Reference 6.3.12.9) accounting for the proposed Rochdale parameters, existing vegetation, built form and terrain. A study area at 8km was agreed with Natural England and Kent Downs AONB Unit.
	4.4.10/10.39	Skyline of Swanscombe Peninsula	The Scoping Report notes how the skyline of the Swanscombe Peninsula is dominated by overhead power lines and pylons in many views. The Inspectorate also notes that there are chalk ridgelines with trees visible to the south which also form an important part of the visual experiences of these landscapes. The ES should acknowledge these features and reflect their importance within the assessment.	The chalk cliffs are acknowledged within the baseline report submitted with the scoping report. Further detail is provided for within the ES Chapter 11 (Document Reference 6.1.11).
	4.4.11/10.41	Public Rights of Way (PRoWs)	The Scoping Report notes that a small number of public footpaths cross the Kent Project Site. The likely significant landscape and visual effects include potentially adverse visual effects on numerous public rights of way, but do not include the adverse landscape effects on those PRoWs which cross the site, both at construction and operational stages. The ES will need to consider in detail the visual impacts on PRoWs crossing the site during both the construction and operational phases.	The ES has assessed these routes and a PRoW Assessment has been completed at Appendix 11.9 (Document Reference 6.2.11.9).
	4.4.12/10.45	Essex Project Site description	The description of the Essex Project Site in the Scoping Report omits reference to salt marsh and mud flats, which are present albeit not to the same extent as on the Kent Project Site. The ES should ensure the description of the receiving environment is accurate and up to date.	The Essex Project Site description has been updated to reflect this.
	4.4.13/10.72	Tree Survey	The Scoping Report states that future assessment of landscape effects for London Resort will include a full tree survey and report, and an Arboricultural Impact Assessment appended to the Landscape and Visual Chapter of the ES. The Inspectorate welcomes this, though the ES should explain how this information has been used to inform the assessment of landscape receptor value (e.g. Ancient Woodland). The ES should also cross-refer to the assessment of ecological impact.	An Arboricultural Impact Assessment is contained at Appendix 12.9 (Document Reference 6.2.11.9).
	4.4.14/10.75-10.76	Possible avoidance and mitigation measures	The Scoping Report lists a series of possible avoidance and mitigation measures. 'Green infrastructure' in the form of hedgerow and woodland planting and creation of public open space is proposed, along with ecological enhancements of the existing marshland. The ES should also address the potential for such measures to mitigate landscape and visual effects.	Further details are provided in the assessment and Landscape Strategy at Appendix 11.7 (Document Reference 6.2.11.7).

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	4.4.15/10.77	Lighting strategy; and special effects and events	The Inspectorate welcomes the proposal to assess lighting impacts during operation and construction. The assessment should also cross- refer to effects on ecological receptors and assess impacts on existing residents to the south, west and east of the Kent Project Site, and residents on the northern side of the River Thames. No details are provided of light effects generated by proposed rides and entertainment, or by events that might utilise lasers, projections, fireworks, flames, thunderflashes, dry ice and smoke, or other visual effects. Although the Inspectorate appreciates that many such details are uncertain at this stage, a 'Rochdale Envelope' approach to the possible impacts of such lighting and special effects must also feature in the assessment of landscape and visual effects within the ES.	The ES includes an outline Lighting Strategy and 'night-view' assessment within Chapter 11 (Document Reference 6.1.11).
	4.4.16/10.84	Significant Constraints	The Scoping Report states that 'There are no significant constraints to development in landscape, visual and arboricultural terms'. The ES should provide sufficient detail to support the veracity of such statements. The ES should also cross-refer to constraints relating to the visual safety of diurnal and nocturnal river navigation, and the presence of areas of Ancient Woodland within or adjacent to the Proposed Development area.	A significant constraint in landscape and visual terms would be a development located within a designated landscape such as an Area of Outstanding Natural Beauty (AONB) or National Park, or landscapes designated at a local scale, such as Special Landscape Areas (SLAs), Areas of Great Landscape Value (AGLV) etc. The Project Site is not located within a nationally or locally designated landscape. Constraints relating to the visual safety of diurnal and nocturnal river navigation. Regarding ancient woodland, the baseline submitted with the scoping report and the ES acknowledges this as a constraint.
	4.4.17	Viewpoints for visitors	In addition to views towards the Proposed Development, the landscape and visual effects assessment could also consider views out for visitors, from within the completed park and also on its rail, road and river approaches. This would allow elements of the design to enhance visitors' visual experience and appreciation of the scheme and the wider landscape setting.	The design of views in and out of the proposed development has been considered in the masterplanning process, informing layout and design.
	4.4.18	Landscape and visual impacts on other receptors	The Inspectorate reminds the Applicant that the landscape and visual effects chapter of the ES must also be adequately cross-referenced with consideration of visual impact on other environmental receptors including transport, heritage and archaeology, and ecology.	Agreed
Other consultee comments				
Dartford Borough Council	Page 93	Chapter 10: Landscape and Visual Effects – General Comments on the Proposed Methodology	<p>The Council notes that their previous comments on the Scoping Report have been included within and note the commitment to agree the final viewpoints with the Council but considers that viewpoints should also be considered looking east from the residential development on the eastern edge of Ingress Park, including consideration of views from the new development proposed on the waterfront here. An additional long distance view should also be considered from the higher ground to the south, from the North Downs. The site is prominent from the Bean junction area and St Clements Way and as a major road junction and access to Bluewater shopping centre this view is seen by millions every year.</p> <p>It is not clear from the Scoping Report where some of the more significant elements to the proposal are to be located, e.g. High rides, security barriers, service infrastructure and it would be useful to set more detailed parameters for some of the land uses and higher/larger developments so that the impact on landscape and visual amenity can be assessed more fully.</p> <p>The proposed CHP plant is to be 18m high to its roof, as many of the buildings on site are likely to be. Chapter 5 also indicates that it will have a 40m stack. The visual impact on this will be dependent upon its location within the red line.</p>	<p>An additional long distance view has been added near Bean junction and near the Cyclopark as agreed with Sonia Bunn at DBC.</p> <p>The parameter plans, works plans and illustrative masterplan provide an indication of where particular elements of the scheme will be located.</p>

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Dartford Borough Council	Pages 93-94	Chapter 10: Landscape and Visual Effects – Mitigation	In due course, the Council will be keen to understand further how the high quality architectural, engineering and landscape design can be delivered through the DCO where this detail is not available at the time of the consideration of the proposal.	A Landscape Strategy (Appendix 11.7; Document Reference 6.2.11.7) is submitted with the proposals.
CSA Environmental	Pages 119-123	Landscape Consultation Response on behalf of EDC	<p>The Landscape & Visual Chapter of the Scoping Report sets out a detailed scope for the landscape and visual assessment, together with supporting plans including proposed viewpoint locations and the baseline LVIA assessment within the submitted appendices.</p> <p>The assessment methodology is stated as being based on GLVIA3 which is welcomed, however given the substantial sections of new road proposed, the assessment methodology should also be based on the Design Manual for Roads & Bridges (DMRB) methodology for highways projects.</p> <p>The 'Relevant Law Policy and Guidance' section of the Landscape & Visual chapter should include reference to the 'Design for Ebbsfleet' and the 'Ebbsfleet Public Realm Strategy', both of which guide development across the whole of the Ebbsfleet Garden City. The Kent Design Guide should also be referenced.</p> <p>The intention to carry out a BS5837 tree survey to inform the masterplan and assessment process is welcomed, particularly in relation to the transport elements of the scheme which are likely to result in the removal of large amounts of existing vegetation. The submitted report identifies Ancient Woodland within the site but does not identify any Tree Preservation Orders. It is understood that there are at least two within the Kent project area.</p> <p>The submitted Zone of Theoretical Visibility (ZTV) appears to assume a 'bare earth' scenario, which represents a worst case scenario and is of limited use in understanding where the Site and the proposals are likely to be visible from, given the built-up surrounding context to the site. A ZTV should be produced with 'obstructions' or 'visual barriers' including buildings and woodland, in order to give a clearer picture of where the site (and proposed development) have potential to be visible from. The ZTV with 'obstructions' or 'visual barriers' should then inform the locations of a refined set of viewpoints to be agreed with the relevant authorities, and may identify additional viewpoints to be included as well as allowing some of those currently proposed to be ruled out. Given the scale of the proposals (parts of which are stated to be 60m in height), the range should also be increased from 6km to 10km, in order to confirm no longer views of the proposals will be possible. This would allow further consideration of potential views from the Kent Downs AONB, with only the edge of the AONB falling within the current 6km range.</p> <p>The methodology states that viewpoint photography will be taken in accordance with the LI's Guidance on Visual Representation of Development Proposals which is welcomed. Visualisations of proposals should be to 'Type 4' standard (as defined in the guidance), allowing for 150% enlargement and should include panoramic images on A1 sheets, at 300 dpi resolution. The visual assessment also needs to include both winter and summer photography for all viewpoints. Wireframe photomontages should be based on winter views, in order to demonstrate a 'worst case' scenario. Where both the Kent and Essex project sites are visible from the same receptor (eg. V17, 19 & 50), two photographic views should be submitted to demonstrate the views to both sites.</p>	<p>The draft DCO includes requirements ensuring that the mechanism of further architectural, engineering and landscaping approvals, is appropriately dealt with.</p> <p>The DMRB is considered.</p> <p>There are four TPOs registered on or adjacent to the Project Site. These are depicted on Figure 12.56 (Document Reference 6.3.12.56)</p> <p>'Design for Ebbsfleet' and 'Ebbsfleet Public Realm Strategy' have been considered and references included in Appendix 11.7 (Document Reference 6.2.11.7).</p> <p>A revised ZTV is included at Figure 11.9 (Document Reference 6.3.11.9)</p> <p>8km study area agreed as sufficient to understand potential views from the AONB. (Meeting held on 22/09/2020 with Sean Hanna, Natural England and Katie Miller, Kent Downs AONB Unit.</p> <p>Photomontages accord with 'Type 4'.and are presented as Accurate Visual Representations (AVR) in accordance with LI Guidance.</p> <p>Winter views are taken to represent worse-case scenario. Some additional viewpoints requested by various parties are taken during summer/autumn. Assessment of these views are considered as if they were worst case scenario (i.e. winter). The suite of viewpoints therefore allows for seasonal variation to be considered.</p> <p>Additional views recommended by CSA have been discussed and additional views and photomontage locations added to scope.</p> <p>Photomontages comprise a wireline of the parameters, with a second wireline based on the illustrative model to give an</p>

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			<p>Notwithstanding the above, the viewpoints proposed appear comprehensive and representative of the views experienced from the surrounding area. The locations of proposed wireframe photomontages also appear comprehensive, with a total of 25 photomontages proposed. Some additional recommendations for viewpoints and photomontage locations are set out below:</p> <ul style="list-style-type: none"> • Additional photo viewpoints from the 'Saxon Shore Way' long distance footpath (running along the southern bank of the River Thames, east of Gravesend), including from the Gravesend Promenade; • Additional photo viewpoint(s) from the public rights of way surrounding Bean; • Additional photo viewpoint from the section of 'Wealdway' long distance footpath, east of viewpoint 42; • Additional photo viewpoint and wireframe photomontage from High Street, looking north towards the Grade II* Listed Church of All Saints. This is of particular importance in demonstrating the potential impact on the designated heritage asset and its setting, on the approach from the south. The proposed V5 on Galley Hill Road/Pilgrims Road should be taken from Galley Hill Road on the approach towards the church from the east, to illustrate the potential impact on the setting of the heritage asset on this approach; • Additional wireframe photomontages from V39 (Fort Road) and V50 (River Thames) to illustrate the potential impact on the Grade II* Listed 'Riverside Station, including floating landing stage' at the Tilbury Ferry Terminal, and its setting; • Additional photo viewpoints from the paths within the southern and western parts of Botany Marshes, in addition to the proposed V22 & V23 which are taken from the public footpath NU1; • Additional photo viewpoint from public footpath DS12 (Pilgrim's Way) within the site; • Additional photo viewpoint from public footpath DS17 within the site/from the pedestrian footbridge over the railway line; and • Additional photo viewpoint in the vicinity of the Dartford Crossing, either from the QE2 bridge or from public footpath DR1 on the southern bank of the River Thames. <p>The ZTV (based on broad parameters) is stated within the Landscape & Visual appendices as being based on indicative height parameters including: "building heights (32m), structures/themed mountain (60m), rollercoasters and rides (40m) and hotels, staff accommodation and multi-storey car park (32m). For the road infrastructure, including assumed improvements to the A2 and introduction of link road to the resort, a figure of 25m has been used." Whilst it is understood that the parameters of the scheme are not fixed at this stage, a plan should be included to illustrate what assumptions the above ZTV modelling has been based on.</p>	<p>impression of how the scale and massing of the proposals will fit within the parameter.</p> <p>Where both the Essex and Kent Project Sites are visible, they are presented in one panoramic view, in some cases split across sheets in accordance with the LI Guidance.</p> <p>Further details of potential effects on PRow on and off site are detailed within Appendix 11.9 (Document Reference 6.2.11.9)</p> <p>There is a Landscape Strategy (Appendix 11.7, document reference 6.2.11.7) and Public Right of Way and Public Access Strategy (Figure 11.18, Document Reference 6.3.11.18) ensuring access and public open space is incorporated. These are linked closely with the ecology constraints.</p>

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			<p>Further detail is also required as to how the proposed wireframe photomontages will be produced in the absence of a detailed scheme. It is stated within the Introduction chapter that the Rochdale Parameters will be applied to development within Gates One and Two. However, clearly the rides and structures will be some of the tallest and most visually prominent elements of the scheme and therefore a clear set of assumptions and maximum height parameters is required to ensure the photomontages convey a reasonably accurate representation of the proposals.</p> <p>The potential likely significant landscape and visual effects should make reference to the Western Thames Marshes LCA which, as defined by the Landscape Assessment of Kent, is likely to undergo substantial change as a result of the proposals.</p> <p>The potential likely significant landscape and visual effects include adverse visual effects on numerous public rights of way, but do not include the adverse landscape effects on those public rights of way which cross the site, both at construction and operational stages. Paragraph 5.71 of the main report states that rights of way will be altered, diverted, stopped up and/or improved where necessary, with no further details given except in relation to the retention and enhancement of Pilgrim's Way/public footpath DS31/DS12 (paragraph 5.79 of the main report). The Landscape & Visual chapter should highlight any public rights of way which may require stopping up and diverting as part of the proposals. It is recommended that public footpath DS1/NU1 be retained or diverted northwards, in order to maintain a route around the northern edge of the Swanscombe Peninsular.</p> <p>The proposed highways works will impact substantially on the Ebbsfleet Gateway area, including the landscaping at the Ebbsfleet junction of the A2. This area is subject to an Ebbsfleet Gateway Landscape Study, which is being undertaken by LDA and EDC. As this area announces the arrival into the Garden City, early engagement and consultation with EDC is recommended. Engagement is also recommended in relation to the Ebbsfleet Central area, which is currently at the masterplanning stage, and is also likely to be impacted upon by the proposed highways works.</p> <p>The landscape mitigation measures are stated to include the provision of high quality public open space. A key consideration for the retained areas of marshes will be how these are accessed and separated (both physically and visually) from the entertainment report area boundary. These areas will also form important ecological mitigation habitat and a balance will need to be struck to ensure the remaining marshes do not become heavily used by the public. The Illustrative Masterplan submitted does not indicate any proposals outside of the main entertainment resort.</p> <p>The appended Landscape and Visual Impact Assessment Baseline sets out a methodology for assessing landscape value, susceptibility and sensitivity but does not appear to apply this to assessing the site, or indeed the surrounding LLCAs. Only the key characteristics appear to be listed for each LLCA. The Visual Receptors baseline sets out a summary of the visual baseline but does not go into detail about the views experienced from each key receptor, and instead groups large numbers of receptors, providing a general commentary on these. The visual baseline also lacks any accompanying photographic sheets and a commentary on how seasonal variation will affect each view. As set out above, both summer and winter photography should be provided within the assessment.</p>	

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Environment Agency	Page 126	Chapter 10: Landscape and visual effects	<p>10.57 There is mention of plans to relocate services. We will need to understand the location of these as we do not want them placed in close proximity to any flood defence as this can add difficulty and increased costs to undertaking works in the future if required.</p> <p>10.77 There would be significant benefit to marine and euryhaline fish species, especially juveniles, from the creation of new, functional, saltmarsh areas, so we would support any opportunities to extend these areas.</p> <p>Sustainable Drainage System (SuDS) could provide support and enhancement for marsh areas or wildlife habitats. Such systems should have provision of isolation systems/valves to protect these dependent habitats from pollution if the SuDS system is compromised.</p> <p>Any lighting strategy should include the piers and waterfront areas and ensure that the river corridor and nocturnal migrations of wildlife are not adversely impacted.</p> <p>Any proposals for tree planting in proximity to flood defences will need to be reviewed by us.</p>	<p>The EA have been consulted on flood defence design and considerations, salt marsh extension strategy and approach to SUDs including creation of constructed reed beds.</p> <p>The results of these discussions are illustrated in the Landscape Strategy, Appendix 11.7 (Document Reference 6.2.11.7).</p> <p>The Lighting Strategy is included as document reference 7.9.</p>
Gravesend Borough Council	Page 156	Landscape and Visual Effects	<p>4.50 This is a topic area where the lack of clarity over the potential scale and massing of the development impacts directly. That said the context the sites context is one of mainly industrial development but with significant changes in land use patterns to be considered. It is also necessary to take account of views across the river and along the river (including from the Grays/Tilbury side).</p> <p>4.51 Potential viewpoints are listed in figure 10.4. (along with information on the ZVI) and table 10.3. Without knowing the scale and massing of the content of Gates 1 & 2 and other structures it is difficult to know whether these are sufficient but must presumably have been taken into account to produce the ZVI zones. The introduction of more activity at Tilbury compared with 2014 means that views from Gravesend Town centre, with its conservation areas and listed buildings, also need to be considered. In Gravesend new residential development at Northfleet Embankment West and East also needs to be factored in. The Hill, Wallis Park and Carl Ekman House in Northfleet should be considered as viewpoints, which were listed in our 2014 response. Further discussion is needed on this issue with the consultants, which is what is suggested in the document.</p> <p>4.52 An impression is given this is all about the views into the development but there is also the views out for visitors, both within the park and also on its approaches, whether from Ebbsfleet or along the river. Although much of the park activities will be inside structures, the chalk cliffs and views across the river do form an interesting backdrop for the visitor experience and give a sense of place.</p> <p>4.53 Green Belt has been included under landscape thought it more correctly belongs under the Land Use and Socio-Economic effects chapter, where comment has been made above.</p> <p>4.54 Effects of the interaction of chalk extraction, CKD deposit and the original marshes have produced a set of distinctive landscapes. The 190m tower of the 400 Kv overhead power connection across the river is an obvious distinctive feature, albeit see through rather than solid. It has a twin in Thurrock.</p>	<p>RE 4.50 parameters and an illustrative masterplan have informed the ES. Cross river views are considered, whilst additional ones have been added from Gravesend looking north to the Essex Project Site.</p> <p>RE 4.51 As discussed with Tony Chadwick at GBC, obtaining views from private residential dwellings such as Carl Ekman House and Wallis Park is practically too difficult and not essential.</p> <p>Other comments noted.</p>

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			<p>4.55 Zone of Visual Influence (ZVI) in Tilbury of necessity has to include reference to the implications on Gravesend Town Centre directly opposite (note this applies to location as well due to the Conservation areas and listed buildings involved).</p> <p>4.56 Scheme impacts the Ebbsfleet Valley and with the Ebbsfleet stream which flows into the Thames at Northfleet Harbour. The North Kent Line embankment creates a barrier across the valley that did not exist historically, which does break up the continuity that presumably existed before it was built. It, with the A226, makes a strong distinction between the more open area on the marshes and the confined space of the Ebbsfleet Valley.</p> <p>4.57 The design of the project needs to project a positive image externally.</p> <p>4.58 CHP plant impact is unclear as is the location of the building and chimney. If located out on the Peninsula this is putting a structure in what is currently essentially an open landscape with long views up (Dartford Crossing Bridge) and down the river (towards the out Estuary at Cliffe).</p>	
Historic England	Page 173	Overall Approach	<p>We think it essential therefore that an integrated landscape approach to assessment of heritage assets (both designated and undesignated) is undertaken and translated into the report and any other supporting documentation.</p> <p>In order to achieve this, we strongly support the concept of an overarching Historic Environment Framework, which can be used to draw together existing information, and be used as a basis for design decisions. The HEF would be an evolving document but there is already a significant amount of new information which could be incorporated within it. This process needs to happen rapidly in order for the HEF to be able to significantly steer how the design proposals for the site develop.</p> <p>Geoarchaeology will be a key element of this project, and Landscape characterisation would help predict previous land use; combining geology and archaeology to identify where people might have lived and their contemporary environment, and providing evidence to feed into an overarching deposit model.</p> <p>We recommend close collaboration of cultural heritage and landscape/visual impact assessment, in order to adequately address issues in relation to setting of designated heritage assets. Techniques such as photomontages, computer generated views analysis imagery, and verified views with rendered images are a useful part of understanding visual impacts. Analysis of the views from within the site boundaries, out of, and across the key site areas in relation to designated heritage sites will be very important.</p>	<p>We have included photoviewpoints from within the vicinity of designated assets. The ES Chapter 11 comments only on the landscape and visual change as a result of the proposed development, not on the significance of effect upon designated heritage assets. Those matters are reserved for the Heritage ES Chapter 14 (Document Reference 6.1.14), of which views to/from heritage assets were consulted by the Applicant.</p>
Historic England	Page 182	Advice on Assessment of Setting and Built Heritage	<p>We note that Chapter 10 (Landscape and Visual Effects) states that a visual assessment will be carried out and viewpoints have been included. We are not included in the list of consultees for this document, and we would wish to be included. We encourage an inter-disciplinary approach, particularly given the overlap of visual impacts on landscape and cultural heritage. It will be important that the conclusions found in this document are used to inform the Cultural Heritage chapter and vice versa, to ensure consistency. We also note that although some of the viewpoints within the LVE Chapter (Table 10.3) are from designated assets, further viewpoints should be included, either as part of the visual assessment, or separately, to assess the impact of the proposal on designated assets' significance. We would therefore encourage the applicant to consult us regarding significant viewpoints that should be assessed.</p>	<p>We have included photoviewpoints from within the vicinity of designated assets. The ES Chapter 11 (Document Reference 6.1.11) comments only on the landscape and visual change as a result of the proposed development, not on the significance of effect upon designated heritage assets. Those matters are reserved for the Heritage ES Chapter 14 (Document Reference 6.1.14), of which views to/from heritage assets were consulted by the Applicant.</p>

Consultee	PINS ID/Ref	Topic	Scoping comments	Project consultant's response
Natural England	Page 255	6. Designated Landscapes and Landscape Character	<p>6.1 The plan entitled 'Zone of Theoretical Visibility (based on broad parameters)' (drawing reference edp5988_d033b dated 8 June 2020) provided within the appendices to the Scoping Report highlights that areas of the Kent Downs Area of Outstanding Natural Beauty (AONB) fall within the zone of theoretical visibility.</p> <p>6.2 Natural England notes that a single photographic viewpoint is proposed within the Kent Downs AONB (viewpoint reference EDP 41) on Footpath NS177 at Cobham. Given the national importance of the Kent Downs AONB, we would welcome the opportunity to discuss the scope of the landscape and visual impact assessment in detail with the applicant to ensure that a robust assessment of potential impacts to the AONB is included within the environmental statement. This may require additional viewpoints, considering both summer and winter views, to be included within the assessment.</p> <p>6.3 Natural England would wish to see details of local landscape character areas mapped at a scale appropriate to the development site as well as any relevant management plans or strategies pertaining to the area. The EIA should include assessments of visual effects on the surrounding area and landscape together with any physical effects of the development, such as changes in topography.</p> <p>6.4 The environmental impact assessment should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies. We encourage the use of Landscape Character Assessment (LCA), based on the good practice guidelines produced jointly by the Landscape Institute and Institute of Environmental Assessment in 2013. LCA provides a sound basis for guiding, informing and understanding the ability of any location to accommodate change and to make positive proposals for conserving, enhancing or regenerating character, as detailed proposals are developed.</p> <p>6.5 Natural England supports the publication 'Guidelines for Landscape and Visual Impact Assessment', produced by the Landscape Institute and the Institute of Environmental Assessment and Management in 2013 (3rd edition). The methodology set out is almost universally used for landscape and visual impact assessment.</p> <p>6.6 In order to foster high quality development that respects, maintains, or enhances, local landscape character and distinctiveness, Natural England encourages all new development to consider the character and distinctiveness of the area, with the siting and design of the proposed development reflecting local design characteristics and, wherever possible, using local materials. The Environmental Impact Assessment process should detail the measures to be taken to ensure the building design will be of a high standard, as well as detail of layout alternatives together with justification of the selected option in terms of landscape impact and benefit.</p> <p>6.7 The assessment should also include the cumulative effect of the development with other relevant existing or proposed developments in the area. In this context Natural England advises that the cumulative impact assessment should include other proposals currently at Scoping stage. Due to the overlapping timescale of their progress through the planning system, cumulative impact of the proposed development with those proposals currently at Scoping stage would be likely to be a material consideration at the time of determination of the planning application.</p>	<p>RE 6.2, meeting held with Sean Hanna at Natural England and Katie Miller of the Kent Downs AONB unit on 22/09/2020. A further two viewpoint locations have been added, bringing the total AONB images to three. These three images also have photomontages and night views.</p> <p>RE 6.3, these are provided in Appendix 11.1: Landscape and Visual baseline report (Document Reference 6.2.11.1).</p> <p>RE 6.4, Chapter 11 (Document Reference 6.1.11) includes an assessment upon the local landscape character areas.</p> <p>RE 6.7, cumulative effects are covered in Appendix 11.6 (Document Reference 6.2.11.6) and summarised in ES Chapter 11 (Document Reference 6.1.11).</p> <p>RE 6.8, the Landscape and Visual baseline report refers to NCAs and additional commentary is provided within the ES Chapter 11 (Document Reference 6.1.11).</p>

Consultee	PINS ID/Ref	Topic	Scoping comments	Project consultant's response
			6.8 The assessment should refer to the relevant National Character Areas which can be found on our website. Links for Landscape Character Assessment at a local level are also available on the same page.	
Thurrock Council	Page 312	Landscape and Ecology	<p>The LVIA is to be prepared in accordance with the Guidelines for Landscape and Visual Impact Assessment 3rd edition. The general approach set out in Chapter 10 and described in detail in Appendix 10 is considered appropriate. Thurrock Council is currently finalising a draft Landscape Character Assessment which can be supplied to the landscape architects preparing the LVIA as it contains more detailed analysis compared to the Thurrock Landscape Capacity Study. The Essex Project Site description (10.45-48) describes the area are a low-lying and level landscape and refers to the listed buildings on site. The description does not refer to the adjacent coastal grazing marsh, an important historic landscape feature which has been lost across most of the county, or Tilbury Fort, a Scheduled Monument. Most of the proposed viewpoint locations within Thurrock are considered to be appropriate; however it is considered that VP34 should be moved to the public open space beside Thames Drive, Chadwell St Mary as there are unrestricted views from the open space and houses towards the Kent and Essex Project Sites.</p> <p>The proposed night-time viewpoints are considered appropriate; however, it is noted that no viewpoint has been proposed for anywhere in Tilbury. It is not possible to be certain if a viewpoint location is required in this area without having the details of what lighting is proposed for the Essex Project Site and how this will differ from what is currently on site. If it is decided not to provide a viewpoint in this area, then Thurrock Council will wish to see this justified within the LVIA.</p> <p>Paragraph 10.58 describes the main potential likely significant landscape and visual effects of the proposed development. While the scheme could deliver some landscape and visual benefits, principally on the Swanscombe Peninsula, Thurrock Council is concerned about the effects the scheme will have for residents looking across the Thames. The effects are likely to be more pronounced at night when there would be significantly more lighting visible.</p>	<p>PVP34 has been moved to suggested location. The coastal grazing marsh is referred to within Appendix 11.5 (Document Reference 6.2.11.5).</p> <p>Two additional views added, one from King George Playing Field and Anchor Fields Park within Tilbury. It is not considered night views are needed from within Tilbury</p>
Thurrock Council	Page 313	Landscape and Ecology	<p>Summary</p> <p>It is important to reiterate the point made by Kent County Council in its previous response regarding landscape (Table 10.2) that built, natural and historic environment together produce the character of our landscapes. This is particularly important for the Tilbury Marshes which is a remnant of the much larger coastal grazing marshes that once dominated the Thames, contains an important Scheduled Monument and has ecological importance. While the proposed scheme does not appear to have a direct impact on this area, indirect effects could further detract from its quality. Thurrock Council will be looking to see what mitigation and enhancement measures are proposed to enhance the setting of the marshes, Tilbury Fort and the Cruise Terminal. The proposed Landscape and Ecology Management Plan (paragraph 1.90) should address this area.</p>	Noted.