



# CLEVE HILL SOLAR PARK

ENVIRONMENTAL STATEMENT  
VOLUME 4 - TECHNICAL APPENDIX A7.5  
S42 CONSULTATION COMMENTS (LUC COMMENTS ON BEHALF OF KCC,  
SBC AND CCC)

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**A7.5    TECHNICAL APPENDIX A7.5: S42 CONSULTATION COMMENTS**

(LUC comments on behalf of KCC, SBC & CCC)

Section 42 Applicant Regard to Consultee Responses		
Consultee	Comment	Response
Kent County Council	Chapter 7: Landscape and Visual Impact Assessment	No comment required.
Kent County Council	KCC commissioned Land Use Consultants (LUC) on behalf of Swale Borough Council, Canterbury City Council and KCC to undertake a review of the Landscape and Visual Impact Assessment (LVIA) submitted as part of the PEIR.	No comment required.
Kent County Council	In summary, the review does not consider the PEIR to represent a robust assessment of the landscape and visual effects of the proposed development. There are several areas identified as lacking clarity, such as issues relating to the assessment methodology, baseline, mitigation and potential effects. KCC requests that these are addressed for the final Environmental Impact Assessment (EIA) report.	Text and assessment has built in comments made by LUC throughout Chapter 7 LVIA of the ES.
Kent County Council	The LVIA does not acknowledge the scale and extent of the proposed development, and the effect that it may have on the key characteristics of remoteness and openness in the area. The development is repeatedly compared to features such as pylons and an existing substation, which are of a different form and scale. The full LVIA review is appended (appendix 1).	Text has been amended based on detailed comments provided by LUC and acknowledges scale and extent of the development. This is report in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	Introduction	No comment required.
Kent County Council Appendix 1	1.1 LUC was commissioned by Kent County Council (KCC) to undertake a review of the landscape and visual impact assessment (LVIA) contained in the Preliminary Environmental Information Report (PEIR) submitted for the Cleve Hill Solar Park.	No comment required.
Kent County Council Appendix 1	1.2 This review is based on an appraisal of these documents, and has been undertaken by Chartered Members of the Landscape Institute at LUC. No site work was undertaken, although our conclusions are informed by our familiarity with the area through current work for Swale Borough Council.	No comment required.
Kent County Council Appendix 1	The Solar Park Development	No comment required.
Kent County Council Appendix 1	1.3 The proposed Cleve Hill Solar Park is described in full in Chapter 5 of the PEIR. Key parameters of relevance to LVIA include:	No comment required.
Kent County Council Appendix 1	· Total site area of 492.3 hectares (ha), of which 387.6 ha is arable land, where the development will take place (although the actual area of solar panels is not clearly stated);	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	· Around 2,900 'tables' or solar panels, each approximately 28m by 25m and with a maximum height above ground level of between 3m and 3.9m, to allow for flood clearance;	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	· The tables will be arranged across 26 'fields' across the development site;	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	· 72no transformers across the site, each 8.2m by 2.3m, and 3m high, typically coloured green;	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	· An electrical compound of 325m by 250m, surrounded by a soil bund around 20m across and between 3.3m and 4.8m above ground level, and containing:	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	a substation, with various components up to 12.8m high; and	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	an electricity storage facility that occupies over half of the compound area, and comprises modules up to 2.2m high;	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	· 15 km of 2m high deer fencing (timber and stock netting) enclosing the operational area;	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	· Around 240 CCTV cameras on 3m poles;	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	· Lighting will be limited to the substation and transformers, and will be sensor-activated;	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	· A stone 'spine road' of around 2.8km in length will provide the main access, with other access via existing farm tracks or grassed tracks; and	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	· The development site will be grazed by sheep during operation.	The PEIR text has been updated following the design changes during the ES stage and is reported in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	1.4 Embedded mitigation measures are described, including:	No comment required.
Kent County Council Appendix 1	· Existing public rights of way through the site will be retained;	Noted and no changes to the PEIR text were required prior to finalising the ES.
Kent County Council Appendix 1	· A habitat management area will be established, comprising 41 ha of arable land and 37.1 ha of freshwater grazing marsh – details of this area are set out in Appendix 5.2;	The PEIR text has been updated following the design changes during the ES stage and is reported in technical appendix A5.2 of the ES.
Kent County Council Appendix 1	Other landscape proposals include:	No comment required.
Kent County Council Appendix 1	establishment of 3.52 km of native-species hedgerows, containing 554 native trees, in the southern part of the development;	Following design changes from PEIR to ES there has been some change to the areas of mitigation. Revised quantities of hedgerows and hedgerow trees are found in the ES technical appendix A5.2 LBMP and illustrated in Figure A5.2.

Kent County Council Appendix 1	establishment of 1.3 ha of native woodland shelterbelt in the southern part of the development;	Following design changes from PEIR to ES there has been some change to the areas of mitigation. Revised quantities of hedgerows and hedgerow trees are found in the ES technical appendix A5.2 LBMP and illustrated in Figure A5.2.
Kent County Council Appendix 1	establishment of 1.5 ha of native woodland on the bund around the electrical compound; and	Following design changes from PEIR to ES there has been some change to the areas of mitigation. Revised quantities of hedgerows and hedgerow trees are found in the ES technical appendix A5.2 LBMP and illustrated in Figure A5.2.
Kent County Council Appendix 1	establishment of 4.3 ha of native species scrub along the northern edge and south eastern corner of the development.	Following design changes from PEIR to ES there has been some change to the areas of mitigation. Revised quantities of hedgerows and hedgerow trees are found in the ES technical appendix A5.2 LBMP and illustrated in Figure A5.2.
Kent County Council Appendix 1	1.5 The LVIA is included in Chapter 7 in Volume I the PEIR, and in appendices 7.1 to 7.5. Supporting figures are included in Volume II, with viewpoint photography and visualisations in Volume IIB.	No comment required.
Kent County Council Appendix 1	Scope of the LVIA	No comment required.
Kent County Council Appendix 1	1.6 The proposals are briefly summarised at 7.1.1, although this does not refer to the unusually large extent of the development, which we consider is of particular relevance to the LVIA and could be highlighted more explicitly here.	Text has been added to Section 7.1.1 of Chapter 7 of the ES.
Kent County Council Appendix 1	1.7 Scoping and consultation responses are set out in detail in Table 7.1. The second column of this table, headed 'Type and Date', is incomplete, and it is therefore difficult to tell when the comments recorded were made, and whether any follow-up consultation was carried out after the Scoping Opinion was received. For example, the Planning Inspectorate recommend "Consultation with the local planning authorities to discuss and agree the final selection of representative viewpoints and photomontages for the inclusion in the ES" (page 7-7). However, it is not clear if this consultation has taken place, or whether this is being done as part of the PEIR.	The ES, chapter 7, Table 7.1 includes a completed second column and when consultee comments where made. Consultation on viewpoints was undertaken at scoping and PEIR. Viewpoints that consultees have requested to be considered have been included, such as Whitstable Harbour and Kent Downs AONB. These viewpoint photographs are found in the ES, Volume III Visualisations.
Kent County Council Appendix 1	1.8 Notwithstanding this, the responses to each consultation point are positive in tone, and refer to information that has been provided within the PEIR, and in some cases where further information will be provided in the ES (such as in relation to summer time photography).	As planned, summer visualisations have been undertaken and are found in Volume III Visualisations of the ES.
Kent County Council Appendix 1	Methodology	No comment required.
Kent County Council Appendix 1	1.9 The LVIA methodology is set out in Section 7.2, beginning with a list of 'legislation and guidelines', although only guidance documents are listed.	Amended to say Relevant Guidelines and Policies in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.10 We question the relevance of the Scottish Natural Heritage guidance on "Assessing the Cumulative Impact of Onshore Wind Energy Developments". A key document for Swale relates to the review of local designations and this should be fully referenced (2003 and 2014 documents).	SNH Guidance reference removed and other relevant references have been added to Chapter 7 of the ES.
Kent County Council Appendix 1	1.11 The methodology presented is aligned with the third edition of Guidelines for Landscape and Visual Impact Assessment ('GLVIA3') which is the appropriate guidance, and generally follows the key steps recommended. We comment below on the detailed application of GLVIA3.	No comment required.
Kent County Council Appendix 1	Study area and ZTV	No comment required.
Kent County Council Appendix 1	1.12 It would be helpful to the reader if the study area was defined first, prior to discussion of the site visits and ZTV. In defining the 'Core Landscape Study Area' (paragraph 20) a reference is made to "vegetation changes visible from more than 100 m away". It is not clear how this level of visibility has been determined.	Study area text has been moved to sit in the report before site visits and ZTV. This can be found in Section 7.2.2 Study Areas in Chapter 7 of the ES.
Kent County Council Appendix 1	1.13 Paragraphs 21 and 22 describe a larger study area for landscape effects than for visual effects. In our experience, effects on views are more likely to be significant at greater distances than effects on landscape character.	Landscape and visual study areas have been amended so they are the same and cover up to 5km. These are reported in Section 7.3 of Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.14 The definitions of a Core Landscape Study Area 100m (CLS), Wider Study Area – 5km and Principal Landscape Study Area (PLS)/LVIA Study Area (2km) is confusing to the reader and greater clarity on the purpose of these areas and how they are used would be helpful.	Text has been amended to provide greater clarity on these study areas and they are used within the text. This is reported in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.15 The ZTV is only shown to 2.5km (Figures 7.2 and 7.3), whereas almost all the other figures show the 5km study area. Given that some of the assessment viewpoints are outside the 2.5km area, it would be helpful to see the wider ZTV. We recommend 5km is adopted as an appropriate distance for assessing visual effects as well as landscape.	ZTV has been re-run to cover 5km for Figures 7.2 and 7.3, these figures are shown in Volume II of the ES.
Kent County Council Appendix 1	1.16 It is accepted that the 'bare earth' approach to ZTV overestimates likely visibility. The approach described at paragraph 19 (and in Appendix 7.1) seeks to offset this through use of Lidar and modelling of trees: if trees are represented as solid bodies this may lead to visibility being underestimated, particularly in winter. We suggest clarity is sought in relation to how trees are modelled.	Paragraph added on Appendix 7.1 and in Paragraph 24 in relation to how the purchased National Tree data is modelled. This can be found in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	Impact assessment methodology	No comment required.
Kent County Council Appendix 1	1.17 As a general point, this section is occasionally repetitive, for example paragraphs 49 and 50 repeat earlier paragraphs unnecessarily. The applicant should be asked to thoroughly proof-read the EIA Report to check for repetition/inconsistencies.	Reference to susceptibility twice in the text has been removed. Updated text is found in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	Sensitivity	No comment required.

<b>Kent County Council Appendix 1</b>	1.18 The LVIA uses the correct definition of sensitivity considering susceptibility and value, although we comment on its application in practice.	No comment required.
<b>Kent County Council Appendix 1</b>	1.19 At paragraph 30 it is stated that sensitivity assessment was undertaken “in consultation with statutory consultees and local interest groups”, and “alongside other technical studies, principally ecology and cultural heritage”. This section presents no evidence of stakeholder engagement, or how other technical disciplines have influenced the sensitivity assessment. We suggest confirmation is sought from the applicant on how this has been undertaken in practice.	Reference to this text has been removed from Chapter 7 LVIA in the ES. Reference to design evolution to reduce impact on sensitive receptors is reported in Chapter 5 of the ES and meetings with statutory consultees have been consulted are report in the Consultation Report.
<b>Kent County Council Appendix 1</b>	1.20 The assessment of landscape value is particularly unclear (para. 36 onwards). Two separate sets of criteria are presented for designated and undesignated areas in Tables 7.2 and 7.3 respectively. The former appears to be assessing ‘importance’, which is not a term defined in GLVIA3. This two-stage assessment is not an appropriate approach. We comment on the application of this approach below.	Reference has been removed to Importance in Table 7.2 and 7.3. The assessment table of Value has been modified and is set out in Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.21 GLVIA3 recommends that landscape designations are the ‘starting point’ for understanding landscape value. The criteria in Table 7.3 (taken from Box 5.1 in GLVIA3) can be applied more generally, with the presence of designation being an additional consideration. The assessment of landscape value also makes no reference to the European Landscape Convention, which attaches value to all landscapes. (Clearly, the site in question is a locally designated landscape as identified in the baseline and Table 7.2). We recommend that the applicant is asked to reconsider this aspect of the methodology.	Reference has been made to the European Landscape Convention in the value element in Table 7.2, in Chapter 7 LVIA of the ES. Box 5.1 in GLVIA was used to assess landscape value in section 7.2.6 to determine the value of the site and we have now referenced this accordingly in the methodology section.
<b>Kent County Council Appendix 1</b>	1.22 In assessing landscape susceptibility, it would be useful if Table 7.4 gave some clearer parameters on the factors which might affect susceptibility and make a landscape more or less able to absorb the development. The criteria also include an emphasis on views. And we note that landscape character sensitivity does not rely on views/visibility.	Reference to visual effects is removed from Table 7.4, which is now presented in Table 7.3 of Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.23 The criteria for assessing the value attached to views (Table 7.6) and visual receptor susceptibility (Table 7.7) look to be appropriate.	No comment required.
<b>Kent County Council Appendix 1</b>	1.24 Sensitivity: Tables 7.5 and 7.8 appear quite rigid in the approach to combining value and susceptibility to define sensitivity: we would encourage a more flexible approach informed by professional judgement.	The ES Chapter 7 LVIA includes the approach to sensitivity in tables 7.5 and 7.8 and the assessments are balanced by professional judgement.
<b>Kent County Council Appendix 1</b>	Magnitude of change	No comment required.
<b>Kent County Council Appendix 1</b>	1.25 The assessment of magnitude of landscape change is correctly broken down into evaluation of size and scale, geographical extent, duration and reversibility. However, the presentation of these as separate factors is not clear. For example, Table 7.9 defines categories of size/scale of change, but includes geographical extent, duration and reversibility in its descriptions. Nature of effect, described at paragraph 55, is not a factor in assessing magnitude. The criteria in Table 7.9 that refer to size/scale are appropriate. Those for geographical extent in Table 7.10 are somewhat vague and it is difficult to know what ‘under consideration’ means in practice. We recommend that the applicant is asked to reconsider this aspect of the methodology.	The reference to nature of effect in paragraph 55 has been removed from the ES. The reference to under consideration has been removed, and text amended in Table 10 Geographical extent table in Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.26 In defining ‘reversible’ effects, paragraph 62 uses the example of a quarry, though this is one of the least reversible forms of development. A better example might be a semi-permanent structure such as a wind turbine that can be fully removed.	Paragraph amended, this is reflected in Paragraph 69 Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.27 The approach to assessing magnitude of visual change is more clearly set out and the criteria are generally appropriate. The way that geographical extent is brought in to the overall assessment in Table 7.15 is potentially confusing, and there is no reference in this table to duration or reversibility. This should be reviewed by the applicant.	Text has been added to include duration and reversability, these are set out in Table 7.15 of Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	Significance	No comment required.
<b>Kent County Council Appendix 1</b>	1.28 The assessment of significance is made with reference to a matrix presented in Table 7.16. Only those effects assessed as ‘major’ or ‘moderate-major’ will be considered ‘significant’. We note that this is inconsistent with the assessment sections, where moderate effects are reported as significant. We comment further on this in our review of the assessment. As a side note, it is recommended that the left axis of this table is titled landscape and visual receptor sensitivity (not visual sensitivity).	Text has been amended to contain moderate, and left axis of table has been titled landscape and visual receptor sensitivity. These are updated in Table 16 and in Section 7.2.9 of Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.29 Paragraphs 76 to 78 provide further criteria for the identification of significant effects. The applicant should be asked to clarify whether criteria are being used, or if the matrix is being relied on, or whether a combination of the two is applied.	Text edited to clarify the criteria used for the identification of significant effects, this is updated in Section 7.2.9 in Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.30 The section on cumulative assessment (7.2.11) covers baseline scenarios and types of cumulative effect, but does not present any methodology for assessing magnitude of cumulative change.	Cumulative sites are assessed in line with section 7.2 Assessment Methodology in terms of Magnitude; however further clarification will be provided within chapter 7 of the ES.
<b>Kent County Council Appendix 1</b>	Viewpoints and visualisations	No comment required.

<b>Kent County Council Appendix 1</b>	1.31 Section 7.2.10 describes the approach to viewpoint selection and visualisations. There is no reference to consultation in this section. There are also several sentences referring to the PEIR in future tense. Paragraph 84 notes that visualisations were prepared for nine of the viewpoints, but does not describe the approach to selecting which viewpoints would be treated in this way. It is not understood what is meant by a “survey of visual reference points” in this paragraph.	The text has been revised to incorporate consultation at scoping and PEIR stages and the reason for selection reference. The reference to a survey of visual reference points has been removed. This is found in Section 7.2.10 of Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.32 Appendix 7.1 presents a brief technical method for photography and photomontage. The approach described is broadly appropriate, though we note redundant references to wind farm modelling and “Highland Council single frame imagery” that suggest this may be a standard appendix that has not been fully adapted for the present purpose. This should be tightened up in the final EIA report, to provide clarity and confidence for readers.	The reference to the Highland Council has been removed from technical appendix A7.1 which can be found in Volume IV Technical Appendices.
<b>Kent County Council Appendix 1</b>	Summary	No comment required
<b>Kent County Council Appendix 1</b>	1.33 Overall, the methodology follows GLVIA3 and appropriately breaks down the assessment process into its component parts. The assessment criteria and thresholds are generally appropriate. However, there are areas that lack clarity, particularly the approach to assessing landscape value and the approach to assessing the size and scale of landscape effects. The methodology is relatively rigid when it comes to combining the different components.	The text has been reviewed and amended based on the consultee comments on methodology and these are reflected in Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	Baseline	No comment required
<b>Kent County Council Appendix 1</b>	Landscape planning policy context	No comment required
<b>Kent County Council Appendix 1</b>	1.34 The baseline section begins with a review of planning policy context. It is stated at paragraph 91 that “The site has no specific landscape designation”. However, Figure 7.8 in Volume IIA of the PEIR clearly shows that the site is entirely covered by an Area of High Landscape Value (AHLV). This AHLV is identified as ‘Kent Level’ in the Swale Borough Local Plan, i.e. it is of county-level importance. There are several further AHLVs within the 5km study area	The text has been amended to reflect this in Chapter 7 of the ES.
<b>Kent County Council Appendix 1</b>	1.35 These AHLV designations are identified in the review of local plan policy, which quotes policy DM24 on ‘designated landscape areas’ (paragraphs 100-102). However, their status as landscape designations should be clearly stated at paragraph 91 and this is a major omission in the PEIR.	Reference to this has been made in Section 7.3.11 in Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.36 Paragraph 91 does mention the Kent Downs AONB, but makes no reference to the special qualities of the AONB, or the relationship between the AONB landscape and the site area. It is also noted that the country parks listed at paragraphs 92 and 93 do not appear on Figure 7.8.	Reference has been made to the special qualities of the AONB in Section 7.3.1.1 in Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	Landscape baseline	No comment required
<b>Kent County Council Appendix 1</b>	1.37 The review of landscape character information (7.3.2 to 7.3.4) appears to be comprehensive in scope. The review of the Swale Landscape Character and Biodiversity Appraisal quotes key characteristics for a large number of character areas, but omits reference to relevant guidelines, such as “Conserve the undeveloped and distinctive character of the marshland, to maintain the integrity of the wider North Kent Marshes” and “Seek opportunities to restore coastal grazing marsh.... Where intensive arable production currently exists” (SLCBA page34 ‘5. Graveney Marshes’). The LCA text also references relevant and useful detail such as an ‘inaccessible landscape’, ‘sense of remoteness’ and ‘panoramic views’ which are relevant to the overall assessment.	Text has been added from the conserve and restore sections into LCA, in Section 7.3.2 of Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.38 The description of the local landscape context at 7.3.5 appears to be accurate and comprehensive, although it is not clear what is meant at para. 182 that states that “The character is incongruous with the surrounding landscapes due to the scale of its land use, and its simplicity”. The meaning here should be clarified as the CLS area is an integral part of the wider Kent Marshes as evidenced in the LCA and the Local landscape Designation and cannot be described as incongruous.	Reference to “incongruous” has been removed and rephrased in paragraph in Chapter 7 LVIA of the ES.
<b>Kent County Council Appendix 1</b>	1.39 The landscape value of the site is assessed at 7.3.6. We comment above on the unclear methodology for assessing landscape value, and also the oversight of the local landscape designation, an error that is repeated at paragraph 183 which wrongly states that “neither the CLS Area nor its immediate vicinity is included within a statutory or non-statutory landscape designation”.	The Kent Level Area of High Landscape Value has been included in the text as a non statutory designation and the values is judged as medium. This is reported in Chapter 7 LVIA in the ES.
<b>Kent County Council Appendix 1</b>	1.40 The site area is stated to be of “local importance and medium value”. As previously noted, only one assessment should be made. We note that Table 7.2 Landscape Value Criteria lists local landscape designations as being of ‘regional’ importance and high/medium value.	Table removed as site is in a high landscape value area and one assessment is made. Text has been updated in Chapter 7 LVIA of the ES.

Kent County Council Appendix 1	1.41 Table 7.17 presents an assessment against each of the criteria from Table 7.3 Assessing the Value of Non-Designated Landscapes. Ideally the LVIA would present a single judgement of landscape value, based on landscape attributes and the presence of landscape designations. The assessment of landscape value in this LVIA is unclear. No assessment of landscape value is made for any area outside the Core Landscape Study Area.	Box 5.1 GLVIA is used to determine landscape value and this is now referenced accordingly in the methodology section. Each landscape has been assessed based on the qualities defined in the prescribed character assessments and box 5.1 has been used to confirm value throughout the assessment.
Kent County Council Appendix 1	Visual baseline	No comment required
Kent County Council Appendix 1	1.42 The description of residential receptors appears to be accurate, but is not cross-referenced to the RVAA. Travelling receptors are also noted, including boat users. There is no reference to the ZTV in these paragraphs.	The RVAA is cross referenced in the relevant sections of the ES chapter 7. References to the ZTV have been included in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.43 At 7.3.10 it is noted that 21 representative viewpoints have been selected, but there is no list of their location, distance from the site, or reasons for selection. Photomontages are provided for nine of these viewpoints, though with no explanation of how they were selected from the main list and the different types of receptor they are representing (although some information is provided in the visual assessment of effects). This is required in the final EIA. We note that these views are all representative views and no specific or illustrative views are included. This is appropriate, although readers might find it helpful to have an illustrative view to demonstrate glare (or an explanation of how it is covered in the photomontages).	A table of viewpoints and photomontages is included to give reasons for the selection and distance from site of viewpoints as set out in Section 7.3.10 in Chapter 7 LVIA of the ES. Lighting reflection is shown on the photomontages based on the angle of sun and time of year and day. This is particularly present on viewpoints 2 and 3 where the receptors see the visualisations from an elevated position where glare will be most prevalent. An additional montage has also been produced within the site (VP22), following PEIR which will also help to demonstrate glare. An assessment of glint and glare effects is provided in Chapter 17 of the ES.
Kent County Council Appendix 1	1.44 The RVAA (Appendix 7.5) identifies 16 individual properties or groups of properties within 1km, which is reasonable and comprehensive.	No comment required
Kent County Council Appendix 1	Mitigation and management	No comment required
Kent County Council Appendix 1	1.45 The LVIA describes ‘embedded’ mitigation that forms part of the proposed development, at Section 7.5. Because this is presented prior to the assessment of effects, the link between impacts and mitigation is not clear. No further mitigation is described following the assessment, and no assessment of residual effects is made, although year 10 effects are reported for visual receptors	Embedded mitigation has been incorporated into the proposed development as per section 4.21 of GLVIA3 as part of the iterative design process. The effects have then been assessed as recommended in section 4.21 accordingly. The iterative design process description has been elaborated on, in the ES chapter 7, to demonstrate the extensive primary mitigation undertaken to better inform the reader. We have also considered residual effects; however we feel that there are no further secondary measures that can be implemented without a net adverse effect on the landscape character of the Core Study Area.
Kent County Council Appendix 1	1.46 Proposals for additional hedgerow, woodland and scrub planting are set out, and although these will offer some ecological benefit, their extent in relation to the solar farm is very small, and the landscape benefit is likely to be limited. Some of the aims appear contradictory, such as screening the development while maintaining open views. It is not clear which views across the site to the Swale are considered important. We also query how well this aim has been achieved, with regard to views from Graveney Hill (Viewpoint 6), since the year 10 photomontage shows that long views over the marshes to the Swale would be obscured by mitigation planting.	We consider that the impact of mitigation planting both ecologically and in visual terms is significant. There is approximately 3.5km of new hedgerow planting, a new woodland, large areas of shelter belt planting, buffer planting and scrub together with large swathes of wildflower and grass seed planting. This connects large disparate areas of vegetation together and creates a strong ecological corridor and low visual screen. In terms of screening the development whilst retaining open views, the context of this is to provide low level screening to remove views of the development whilst retaining views of large skies and wider views to the Isle of Sheppey and the surrounding landscape when viewed from a range of viewpoints, whilst understanding that such viewpoints are representative and receptors experience the landscape in a dynamic way with areas of screening and openness in the current landscape experienced along the existing PROW (VP6 and 7) for instance as well as wider views. Proposed planting also provides a context to more distant views creating a landscape setting for the development through creation of layers within the landscape.
Kent County Council Appendix 1	1.47 It is not clear, for example, how scrub planting on the edge and between solar panels throughout the CLS area will add to the landscape character in this area.	The scrub is intended to add to the overall wildness of the area, which is in keeping of the surrounding landscape. It is acknowledged the scrub will not screen the development.
Kent County Council Appendix 1	Assessment of effects	No comment required
Kent County Council Appendix 1	1.48 The assessment is presented in Section 7.6, and is backed up by tables setting out separate judgements on sensitivity, magnitude and level of effect, and their components, within Appendices 7.2 (landscape) and 7.3 (visual).	No comment required
Kent County Council Appendix 1	Effects of construction	No comment required
Kent County Council Appendix 1	1.49 Construction effects are dealt with briefly, noting their temporary nature. Effects will increase over the construction period towards the level of operational effects, as the number of installed panels increases. Minor effects are predicted for landscape resources and moderate effects are predicted for visual resources. We suggest this would increase over time as the development reaches its final form, at which point the scale of the effects would be the same as for the operational period. Construction effects are not detailed in the appendices.	An assessment of the Construction and Decommissioning phases of the project has been included and has been assessed in line with the proposed methodology in the ES chapter 7 LVIA.
Kent County Council Appendix 1	Effects on landscape	No comment required
Kent County Council Appendix 1	Operational	No comment required
Kent County Council Appendix 1	1.50 In the assessment of landscape effects (Appendix 7.2), we would query whether the scale of the effect has been thoroughly considered against the relevant criteria in Table 7.9, since the narrative appears focused on geographical extent, as though the two are interchangeable. There is little commentary in relation to changes in landscape characteristics in Appendix 7.2.	The text has been reviewed and amended to set out scale and keep geographical area separate, in the ES technical appendix A7.2.

Kent County Council Appendix 1	1.51 The landscape assessment in Section 7.6.2 does not always clearly report the level of effect and the significance as separate judgements. Terminology such as “an impact of minor significance”, or “moderate significant effects”, is used, rather than e.g. “a minor impact, which is not significant”. There is even one instance of “minor significant effects” (paragraph 223), although minor effects would not normally be considered significant. This is clearer in Appendix 7.2, where significant effects are indicated in bold text.	Text has been amended to be consistent through Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.52 The judgements in Section 7.6.2 are also frequently followed by qualifying statements on their duration and extent. According to the methodology, and as set out in Appendix 7.2, these factors are included in the impact assessment, so there is no need to qualify findings on this basis.	A review of the judgements has been undertaken to ensure no qualifying statements are presented in Section 7.6.2 of chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.53 Paragraph 215 states that year 1 and year 10 assessments have been undertaken, but these are not separately reported either in the rest of Section 7.6.2, or in Appendix 7.2. Year 1 and year 10 effects are only reported for visual receptors.	Columns have been added to magnitude to both landscape and visual receptor tables in the ES, technical appendix A7.2.
Kent County Council Appendix 1	1.54 Paragraph 216 to 220 presents the assessment of effects on the Core Landscape Study Area. We agree with the assessment as major (significant), but there are a number of statements that we would query. The development is compared in height with the existing substation and pylons, which are stated to be ‘larger’. However, the extent of the development, which is far greater than these existing features, is not mentioned. The development is also described (226) as ‘low lying’, although with a maximum height of the development of 3m - 3.9m, it is not in itself low lying. There is also little acknowledgement of the loss of remoteness and tranquillity that will result from the development.	Text has been added to Chapter 7 LVIA of the ES to describe the height and the geographical extent which the development would occupy, along with commentary in relation to remoteness.
Kent County Council Appendix 1	1.55 Effects are then reported separately for each landscape character area. The extent of the development relative to that of the character area appears to be the key determining factor, rather than the effect on key characteristics such as sense of remoteness.	Text has been added to Section 7.6.2 of Chapter 7 LVIA of the ES to further consider openness and remoteness where such components which contribute to landscape character are considered to be affected by the development. This is further assessed alongside all components which contribute to specific landscape character areas.
Kent County Council Appendix 1	1.56 In summary, the LVIA reports that the development will result in major and significant effects on the landscape of the Core Landscape Study Area, within the Graveney Marshes LCA. We agree with this judgement of major although it is arguable if it could maintain a sense of openness in this area given the scale of the development.	The text in Chapter 7 LVIA of the ES has been amended to provide clarity in relation to openness in the area, with the Development.
Kent County Council Appendix 1	1.57 Of the other LCAs assessed, only the adjacent Graveney Arable Farmland is predicted to experience significant effects. Minor effects on character will extend across some other LCAs. All effects are stated to be negative, with the exception of the Eastern Swale Marshes Regional LCA, and the Graveney Fruit Farms local LCA, where effects are predicted to ‘turn positive over time’. It is not clear why this would happen in these particular areas.	The reference to effects becoming positive over time have been removed in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.58 The AHLV is assessed as a landscape receptor at 7.6.2.6, despite being overlooked in the baseline section. Moderate effects are predicted for the AHLV, and we agree that this would be a significant effect. In our opinion effects here could be described as major rather than moderate as they change the essence of the local landscape designation (open, remote etc.). Again, it is not clear how the effects would become positive over time.	This has been further considered in the baseline section of the ES chapter 7 LVIA. It was considered moderate due to the extent of the Area of High Landscape Value against the size of the CLS Area and the components affected by development. The text has been amended to remove reference to “turning positive over time”.
Kent County Council Appendix 1	Decommissioning	No comment required
Kent County Council Appendix 1	1.59 The landscape effects of decommissioning (7.6.3) focus primarily on the removal of small areas of mature mitigation planting, rather than the removal of the solar panels and other installations. This leads to the finding of a negative effect. Given the installation of the solar panels is considered to be negative their removal could be interpreted as positive, or at least neutral, returning the landscape to its current condition.	This statement has been revised to neutral, as the site would restored back to its original state. Updated text is found in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	Visual effects	No comment required
Kent County Council Appendix 1	Operational	No comment required
Kent County Council Appendix 1	1.60 At paragraph 245, it is not clear whether year 5 or year 10 effects are being assessed, although only year 10 is referred to elsewhere.	This sentence has been removed in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.61 Significant effects moderate and above are reported for the National Cycle Network, Saxon Shore Way, PRoW ZR485, PRoW ZR488.	No comment required
Kent County Council Appendix 1	1.62 Effects on residential receptors are reported in the RVAA (Appendix 7.5) and briefly summarised at 7.6.4.2. We comment further on the RVAA below.	No comment required
Kent County Council Appendix 1	1.63 In relation to effects experienced by travelling receptors, there is no sense in the narrative of views changing along the course of routes. The assessment for NCN Route 1 focuses on the section on Seasalter Road (viewpoint 5) to the east of the site, but there is no evaluation of the view from the section on Sandbanks Road to the south.	Narrative text has been added for views along the route and is reported in Chapter 7 LVIA of the ES.



Kent County Council Appendix 1	1.64 In relation to the Saxon Shore Way, the assessment provides descriptions of changes in view at various points along the route, though it is not stated that the path is directly adjacent to the development for about 4km. It is stated that mitigation planting will reduce effects somewhat, though the year 10 montages for viewpoints 2 and 3 (Figures 7.50 and 7.51) indicate that planting will have no positive effects on these views.	Commentary on distances has been added to Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.65 The assessment of views experienced along PRoW ZR485, which will pass through the solar panel area, acknowledges that there will be clear open views of the panels, and the sense of containment created, but does not refer to the visual obstruction caused by the panels themselves. Again, it is not clear why these effects would reduce over time.	The assessment text has been revised to more clearly make these points, in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.66 Paragraph 257 highlights mitigation planting that is intended to screen the development in views from PRoW ZR488, while retaining long views to the Swale. However, Figure 7.53 indicates that mitigation planting will obscure the long views over the flat marshes towards the Swale.	The assessment text has been amended as the design at ES has changed from PEIR, most notably proposals for panels have been removed from Field Y. This is reflected in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.67 Views from roads assume that all receptors are of low sensitivity, which may be the case with passing motorists. However, the views from Sandbanks Road and Broom Street are likely to be experienced by recreational walkers and residents, both groups with more of an interest in the view.	The assessment has been updated to make reference to residents and walkers in assessment from these locations. These are reported in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	Summary	No comment required
Kent County Council Appendix 1	1.68 The impact assessment generally reports sensitivity, magnitude and the component judgements, though these are only clearly set out in the appendices. Some judgements are given without clear justification. The level of effect is stated in each case, but the significance is not clear due to inaccurate terminology. Effects are inappropriately qualified in many instances.	Terminology has been amended in Chapter 7 of the LVIA of the ES. A full review has been undertaken to ensure clear justification and that the level of effect is stated in each case, together with clarity of significance.
Kent County Council Appendix 1	Residential visual amenity	No comment required
Kent County Council Appendix 1	1.69 The residential visual amenity assessment (RVAA) is presented in Appendix 7.5. The purpose of RVAA is not to assess significance of effects, but to assess whether the effects on any residential property would be so overwhelming that it would become an unattractive place in which to live, as described in Section 2. This latter judgement is beyond the guidance contained in GLVIA3, and bespoke methodology is generally used.	No comment required
Kent County Council Appendix 1	1.70 The 1km study area defined at Section 3 is appropriate, as is the approach to identifying and grouping properties.	No comment required
Kent County Council Appendix 1	1.71 We note that the Landscape Institute's draft Technical Information Note on Residential Visual Amenity Assessment is subject to change if and when it is finalised.	The Landscape Institute's draft Technical Information Note on Residential Visual Amenity Assessment is still in draft format so the same methodology and approach used at PEIR still applies to the ES stage.
Kent County Council Appendix 1	1.72 Sections 4.2 to 4.4 set out methodology for judging the significance of effects on views from dwellings. It is not clear why this is needed, or why it is significantly different from the methodology set out in the LVIA Chapter. We note that RVAA findings are reported alongside effects on other receptors in Section 7.6.4, however this may not be appropriate if the methodologies are different.	The descriptions of the methodology have been revised to ensure continuity between chapter 7, LVIA, of the ES, and the RVAA.
Kent County Council Appendix 1	1.73 The discussion on sensitivity at paragraph 24 appears to state that all residential receptors are considered to be of high sensitivity. The purpose of the rest of Section 4.2 is therefore unclear.	The RVAA is broken down into two stages. The first stage assesses groups of properties to understand which properties are likely to experience major effects. We assume that all properties in stage 1 are of high sensitivity (worst case) and take forward to a more detailed assessment only those properties that are likely to experience significant effects. At the second stage we assess those properties likely to have significant effects and assess these in detail, visiting (where consent was granted) the interiors of properties to define which views are affected within the curtilage of the property. This approach is in line with RVAA 'DRAFT' guidance and is used to inform the impact of the property from the proposed development.
Kent County Council Appendix 1	1.74 It is stated at paragraph 26 that "the prescriptive categorising of different parts of the dwelling or curtilage based on use is avoided", and we would agree with this. However, at paragraph 29 a list of higher and lower sensitivity parts of the dwelling and curtilage is set out. We would reiterate GLVIA3 in that sensitivity is applied to receptors (people) not parts of a dwelling.	We have reviewed the descriptions to clarify that the sensitivity relates to the receptors (people) as opposed to the property or rooms themselves.
Kent County Council Appendix 1	1.75 The approach to magnitude of change is significantly reduced compared to the LVIA, and there is no indication that size/scale, extent, duration and reversibility have been considered. In our view, the LVIA methodology should be followed to determine whether significant effects on views would occur at residential properties.	The methodology applied in the RVAA has been reviewed and the descriptions revised to ensure consistency between the LVIA and the RVAA.
Kent County Council Appendix 1	1.76 The approach to the additional judgement of the RVAA (i.e. whether effects are 'overwhelming'), beyond the scope of GLVIA3, is set out in Sections 4.5 and 4.7. The approach described is appropriate, and the factors influencing the judgement are clearly set out at paragraph 39.	No comment required.
Kent County Council Appendix 1	1.77 The assessment set out in Section 5 appears to be reliable in the terms of the methodology described, though we highlight the divergence from the LVIA methodology used elsewhere in the LVIA. In some cases it is not clear whether year 1 or year 10 effects are being reported.	The methodology applied in the RVAA has been reviewed and the descriptions revised to ensure consistency between the LVIA and the RVAA. The distinction between year 1 and 10 will be clarified; together with an assessment of year 5.

Kent County Council Appendix 1	1.78 The additional RVAA judgement is not reported in the summary Section 5, and there is limited signposting to the assessments that are set out in Section 7. The conclusions at Section 6 therefore appear to be abrupt, but the assessments of significance are described for each property group in Sections 7.1 to 7.18. Only two locations (cluster 5 Nagden and property 6 Warm House) identified for further detailed assessment, due to major/moderate year 10 effects.	Further signposting has been added between section 5 and 7 to provide greater clarity.
Kent County Council Appendix 1	1.79 These detailed assessments are set out in Sections 7.19 to 7.21, and involve a room-by-room analysis of views. While this presents a high level of detail, there is a more limited sense of effects 'in the round', i.e. the effect on the experience of living in the property, rather than on individual views	A concluding overview for each property has been provided in the revised RVAA to bring out the effect on the experience of living in the property.
Kent County Council Appendix 1	Secondary, cumulative & combined impacts	No comment required
Kent County Council Appendix 1	1.80 Cumulative effects are considered at Section 7.7. Of the 29 cumulative schemes set out in Appendix 7.5, over half are for residential or mixed-use developments. Four are other solar farms, and two are for polytunnels. Paragraph 333 states that 'many' of these developments are not considered in the cumulative LVIA, but it is not stated which ones. The scope of the cumulative assessment is therefore unclear.	Further clarification will be provided within Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.81 As noted above, the methodology for assessing cumulative effects is not clear, and this is apparent in Section 7.7. The sections on landscape character areas are particularly unclear, as it is not stated which other sites are being considered.	Further clarification will be provided within Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.82 The assessment of cumulative visual effects focuses on static receptors, and there is no consideration of sequential effects on views from routes.	Further clarification will be provided within Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	1.83 Overall, the cumulative assessment does not appear to be robust or comprehensive.	Further clarification will be provided within Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	Summary and Non-technical summary	No comment required
Kent County Council Appendix 1	1.84 Section 7.8 presents a summary of effects, and the same text, with minor modification, appears in Section 7.4 of the NTS.	This text has been amended to reflect design changes during the ES stage and assessment of summer viewpoints.
Kent County Council Appendix 1	1.85 The summary records that major effects will occur within LCA 5 Graveney Marshes, but notes that effects in other LCAs will be 'limited', despite significant effects being recorded in the Eastern Swale Marshes and Graveney Arable Farmlands areas (Appendix 7.3). Moderate (significant) effects are recorded on the AHLV. Again there is emphasis on the existing infrastructure on site which is not appropriate since they are of an entirely different form and scale.	Section 7.8 of the ES chapter 7, LVIA, has been amended following design changes between the PEIR and ES, and assessments have been revised where required as a result.
Kent County Council Appendix 1	1.86 In relation to visual effects, there is no commentary on the distribution of significant effects, either in terms of distance from the site or the different receptor groups affected. The summary does note the loss of openness around PRoW ZR485, which is not fully explored in the actual assessment.	Section 7.8 of the ES chapter 7, LVIA, has been revised to make clearer that there will be a loss to the openness around PRoW ZR485, and to include commentary on the distribution of effects.
Kent County Council Appendix 1	1.87 The overall conclusion is that effects are limited to a small geographical area and a small number of receptors. While it may be the case that significant effects do not extend far beyond the site boundary, the area physically impacted is almost 4 km across: the conclusions appear to overlook the sheer scale of the proposed development. There is a strong reliance in paragraph 355 on the embedded mitigation to integrate the development into local landscape character. Again this appears to overlook the scale of the solar panels compared to the scale of planting proposed.	The concluding text in Section 7.8 of the ES chapter 7, LVIA, has been revised to ensure the scale of the Development is acknowledged. The embedded mitigation proposals will assist to some degree in screening the development over time but it is acknowledged that some areas of the development site will be visible due to the open nature of the landscape, particularly to the north of the site, close to the Saxon Shore Way.
Kent County Council Appendix 1	Conclusions	No comment required.
Kent County Council Appendix 1	1.88 Overall, we do not consider that the LVIA within the PEIR represents a robust assessment of the effects of the proposed development. There are a number of areas that lack clarity, and we recommend that the Applicant be requested to remedy these items within the final EIA Report.	Appropriate changes have been made throughout Chapter 7 LVIA of the ES from PEIR to ES stage of reporting.
Kent County Council Appendix 1	1.89 Within the methodology, there are a number of sources of potential confusion, particularly with regard to landscape value and the magnitude of landscape change. We highlight the inconsistent approach to the AHLV designation which covers the site.	The methodology has been reviewed and revised where required with regard to landscape value and the magnitude of change, particularly with respect to the Area of High Landscape Value.
Kent County Council Appendix 1	1.90 The impact assessment does not, in our view, acknowledge the scale and extent of the proposed development, and the effect that it may have on the key characteristics of remoteness and openness in the area. The development is repeatedly compared to features such as pylons and an existing substation, which are of a different form and scale. It is also described as low lying which is not strictly correct – it is of a large horizontal scale but not low lying. There are a number of statements that, while presumably helpful in intent, could be read as disingenuous and potentially as under-reporting the effects.	The ES, Chapter 7, LVIA text has been amended in light of the comments, including to acknowledge the scale and horizontal nature of the development and specific reference is made to remoteness and openness.
Kent County Council Appendix 1	1.91 While many of the judgements of effect seem reasonable, these are not backed up by clear narrative evaluations of sensitivity and magnitude, and their components, as recommended in GLVIA3. The cumulative assessment in particular is unclear and cannot be considered robust.	Chapter 7 LVIA of the ES text has been amended in light of the comments, to clarify further where required.

Kent County Council Appendix 1	1.92 Areas where clarification should be requested are set out below.	No comment required.
Kent County Council Appendix 1	Description of development	No comment required.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The total area of land that will be covered by solar panels should be clearly stated.</li></ul>	Reference has been made to the extent and size of the development in Section 7.1.1 in Chapter 7 LVIA of the ES. More detailed information on the extent of the Development is provided in Chapter 5 Project Description of the ES.
Kent County Council Appendix 1	Consultation	No comment required.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The date and source of consultation comments should be clearly stated in Table 7.1.</li></ul>	Table 7.1 in the ES chapter 7 incudes the date and source of consultation material.
Kent County Council Appendix 1	Assessment methodology	No comment required.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>We recommend that a 5 km study area be adopted for both landscape and visual effects. This</li></ul>	A 5km study area has been adopted for landscape and visual effects where appropriate, in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	would add clarity without introducing additional assessment burden, since viewpoints up to	A 5km study area has been adopted for landscape and visual effects where appropriate, in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	5 km and beyond are already included;	A 5km study area has been adopted for landscape and visual effects where appropriate, in Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The ZTVs should be shown out to 5 km;</li></ul>	The ZTV has been re-run to 5km and is presented in Volume II Figures of the ES.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The approach to modelling trees in the ZTVs should be clearly explained;</li></ul>	A paragraph has been added to techncial appendix A7.1 and reference has been made in Chapter 7 LVIA of the ES in relation to how the purchased National Tree data is modelled.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The involvement of stakeholders, interest groups and other technical disciplines in the evaluation of sensitivity should be fully explained;</li></ul>	Chapter 7 LVIA of the ES has been amended accordingly where required.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The approach to identifying landscape value should be reconsidered by the applicant, with reference to GLVIA3, so that designated and undesignated landscapes are considered on the same scale of relative value. Clarity is required in relation to the local landscape designation AHLV.</li></ul>	Further clarification has been provided within Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The approach to assessing magnitude of landscape change is appropriate, but is not clearly presented, and the applicant should be asked to revisit Section 7.2.7 in general in Table 7.9 in particular;</li></ul>	Further clarification has been provided within Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>A similar review of Section 7.2.8, in relation to assessing magnitude of visual change, would also be beneficial;</li></ul>	Further clarification has been provided within Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The applicant should clarify that moderate effects are considered significant, in the context of the EIA Regulations: although this is how the assessment is reported, the methodology proposes a higher cut-off at moderate-major;</li></ul>	Chapter 7 LVIA of the ES has been amended to clarify that moderate effects may considered significant, subject to professional judgement.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The reasons for using a different methodology in the RVAA for assessing significance of effect on residential properties should be set out, and justification provided that the findings of the two approaches are comparable;</li></ul>	The methodology applied in the RVAA has been reviewed and the descriptions revised to ensure consistency between the LVIA and the RVAA.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>A methodology for identifying magnitude of cumulative change, and thereby levels of cumulative effect, should be supplied as part of the EIA Report.</li></ul>	Further clarification will be provided within Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	Baseline	No comment required.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The applicant should be asked to include proper acknowledgement of the AHLV that covers the site, as well as other local landscape designations in the study area. If available, the reasons for designating these areas should be discussed in the LVIA, alongside the special qualities of the Kent Downs AONB in so far as they relate to the site</li></ul>	Chapter 7 LVIA of the ES makes reference to the AHLV as a designation and qualities of the Kent AONB have been added.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The assessments of landscape value should be revisited following review of the methodology;</li></ul>	Chapter 7 LVIA of the ES includes revised assessments where required following changes to the design of the Development since PEIR, and any revisions to the methodology adopted.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The reasons for selecting each viewpoint should be clearly set out by the applicant, in line with GLVIA3, as well as the further reasons for producing visualisations for only selected viewpoints.</li></ul>	A table has been added in Chapter 7 LVIA of the ES which lists viewpoints, their reason for selection and their distance from site.
Kent County Council Appendix 1		No comment required.
Kent County Council Appendix 1	Mitigation	No comment required.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The link between the proposed mitigation measures, and the effects that they are aiming to mitigate, could be more clearly explained by the applicant.</li></ul>	Chapter 7 LVIA of the ES includes additional text in the mitigation section and where required in the assessment of effects.
Kent County Council Appendix 1	Assessment of effects	No comment required.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The applicant should clarify whether year 1 and year 10 effects on landscape have been assessed;</li></ul>	Chapter 7 LVIA of the ES makes clear where year 1, year 5 and year 10 effects are being assessed.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The applicant should be asked to revisit terminology used to report effects, so that the level of effect and its significance are both clear in each case;</li></ul>	Further clarification will be provided within Chapter 7 LVIA of the ES.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The applicant should be asked to remove the qualifications that follow most of the findings of effect, since these factors should have been included in the assessment;</li></ul>	Revised text has been added to Chapter 7 LVIA of the ES to describe views of routes rather than from static locations, and to consolidate the assessments around factors such as extent and duration.
Kent County Council Appendix 1	<ul style="list-style-type: none"><li>In the EIA Report, the applicant should more clearly explain how mitigation measures are linked to specific identified impacts, and how these lead to effects changing from negative to positive over time;</li></ul>	Chapter 7 LVIA of the ES includes additional text to explain how specific mitigation measures are linked to specific identified impacts and how these have led to effects changing to negative to positive over time, where appropriate.

Kent County Council Appendix 1	<ul style="list-style-type: none"><li>The applicant should be asked to reconsider effects from routes as a whole, rather than simply from static viewpoints on routes; and</li></ul>	Revised text has been added to Chapter 7 LVIA of the ES to describe views of routes rather than from static locations.
Kent County Council Appendix 1	The applicant should be asked to revisit the cumulative assessment, and to clearly present the scope and assessment steps, including the other developments that are contributing to any identified effect.	Chapter 7 LVIA of the ES presents a reviewed and revised cumulative assessment.