

From: [REDACTED]
To: [Cleve Hill Solar Park](#)
Subject: Swale Local Landscape Designation Review Boundary at Cleve Hill
Date: 23 July 2019 14:36:30
Attachments: [REDACTED]

Dear Planning Inspectorate

Swale Local Landscape Designation Review and Recommendations – Recommended boundary change at Cleve Hill

In response to Action Point 1 arising from the Issue Specific Hearing 1 dealing with matters relating to Need, on 17th July 2019, please find attached an extract from the Swale Local Landscape Designation Review and Recommendations document (October 2018) regarding the review of the area around the existing Cleve Hill substation. The extract relates to the North Kent Marshes – South Swale Marshes area, where Cleve Hill is located.

The section of relevance, on page 51 (the third page of this extract), is highlighted in yellow and explains the recommended boundary change around Cleve Hill. In essence, the Review and Recommendations document recommended that for reasons of different 'landform and land use' that Graveney Hill and Cleve Hill, including the large substation development, should be removed from the LLD (local landscape designation).

Also attached are zoomed in screen shots of the relevant GIS layers of the area which show the recommended new boundary in detail.

Please note the map included in Review and Recommendations Report (seventh page of the extract) contains an error in this location, however, the GIS layers are correct, as confirmed with the consultants who carried out this review, LUC, last week.

The Swale Local Landscape Designation Review and Recommendations document was reported to the Swale Local Plan Panel in November 2019, where the recommendations were agreed by the Panel. Details of the Local Plan Panel can be found [here](#) .

Yours faithfully

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North Kent Marshes: South Swale Marshes

Landscape character and quality



Oare – Harty Ferry



Ditches south of Denley Hill near Graveney



Long views across marshes at Luddenham



Oare Creek and the Swale



Moorings at Conyer Creek



Oare Marshes

Candidate LLD name	North Kent Marshes: South Swale Marshes	
Relationship to existing local landscape designation	<p>The North Kent Marshes - Existing AHLV –Kent Level</p> <p>For the purpose of this review the AHLV has been divided into three sections Medway, North Swale (Sheppey) and South Swale</p>	
Extent of area	<p>The proposed LLD forms part of the North Kent Marshes south of the Swale, and covers an extensive area from Milton Creek in the west as far as the borough boundary at Graveney Marshes in the east where it joins Seasalter Marshes in Canterbury. It includes the Swale channel, areas of intertidal land, the flat coastal marshes extending inland to the point where the topography rises, marking the transition to the adjacent enclosed farmland.</p>	
Landscape character context	<p>3: Goodnestone Grasslands (not in current designation but closely related landscape)</p> <p>4: Graveney Grazing Lands (area north of Monkshill Road)</p> <p>5: Graveney Marshes (all)</p> <p>6: Ham Marshes (all)</p> <p>8: Luddenham and Conyer Marshes (all)</p> <p>17: Stone Arable Farmlands (small section at Little Uplees, including gravel pits)</p> <p>21: Graveney Arable Farmlands (small area north of Graveney)</p> <p>31: Teynham Fruit Belt (small sections on edge of this landscape)</p>	
Stage 2: Desk Review (see table 5.1 and Appendix 3)	<p>3: Yes</p> <p>4: Yes, field survey to review boundary</p> <p>5: Yes (note condition)</p> <p>6: Yes</p> <p>8: Yes</p> <p>17: Partial, only for area adjoining marshes around Oare)</p>	<p>21: No, field survey to consider marshes interface</p> <p>31: Yes</p>
Stage 3: Evaluation (see overleaf)	<p><i>Fully meets – with minor boundary adjustments proposed</i></p>	
Boundary commentary	<p>See map</p> <p>The existing boundary is generally contiguous with the marshland character areas and follows a clear line on the ground representing the extent of contiguous low lying marshes abutting the Swale with the LLD boundary extending out to include the Swale channel itself. Where the boundary extends into adjacent character area this represents an area of low lying wetter character (e.g. former gravel pits) and this is appropriate.</p> <p>Goodnestone Grasslands: The boundary revisions included a review of Goodnestone Grasslands – this is an area in good condition, distinctive, and largely undisturbed. It includes areas of grazed pasture and a number of small streams within sinuous ditches, and straight drainage ditches – similar in character to other areas of marshland and linked to the tidal creek at Faversham. The evaluation indicated that these are important features that deserve protection but that the area as a whole does not have a distinct marshland character and includes areas of polytunnels, rough unmanaged ground and development and so does not merit designation as part of the LLD although contains valued features and elements.</p> <p>Graveney Marshes: - The 2014 report suggests a review of this area to reflect the deterioration in landscape quality. Graveney Marshes is a huge expanse of coastal marsh now improved for agriculture and almost entirely under intensive arable land use. Nevertheless, it remains an atmospheric and tranquil landscape with large open and often dramatic skies and is functionally linked to adjacent marshland habitats. It retains a strong sense of remoteness although clearly less 'wild' than the traditional grazing marshes and with the high voltage pylon line being a significant detractor. It is viewed from the Saxon Shore Way that runs on the elevated seawall. The positive attributes of this landscape outweigh the detractors and it is considered to be</p>	

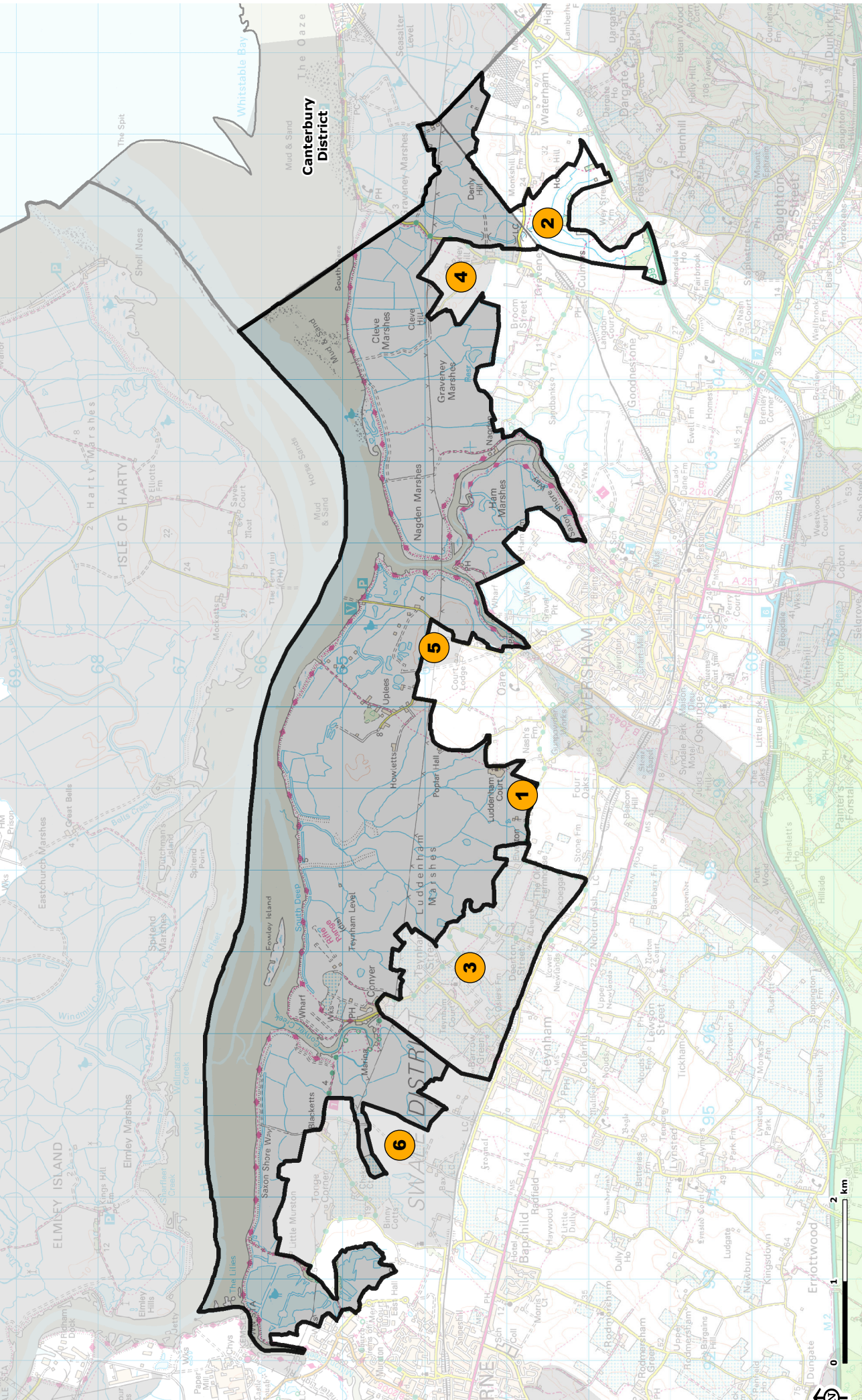
Candidate LLD name	North Kent Marshes: South Swale Marshes
	<p>an integral part of the wider North Kent marshes landscape and should be retained as part of the LLD providing a link and continuity with Seasalter Marshes to the east, an LLD supported by Canterbury District Council. This area is also locally highly valued as demonstrated by the stakeholder consultation.</p> <p>Additions</p> <ol style="list-style-type: none"> 1. Southern boundary extensions to follow the character area boundary at Wildmarsh and Luddenham – See note below (3) in relation to Tonge and Luddenham LLD. 2. Graveney grazing marshes – despite having a much more enclosed, small scale ‘valley’ character compared to the extensive flat marshland along the coast it is recommended that the boundary is extended to include the two fingers of grazed marsh that continue south of Denly Hill (east of the village of Graveney) forming an area of distinctive ‘marsh’ character inland as far as the A299. 3. The potential future removal of the Tonge and Luddenham LLD (due to small size of remaining qualifying area) suggests that the boundary of the marshes LLD could be extended to include part of this area. It is not ‘marshland’ but contains minor springs and streams draining to the marshes and is functionally linked. The extended area could incorporate Luddenham Church, a distinctive feature at the edge of the marshes and the wetland springs around Deerton Street and Teynam Street which drain to the marshes. <p>Deletions</p> <ol style="list-style-type: none"> 4. Graveney Hill – Cleve Hill (part of Graveney Arable Farmlands) – this is not part of the marsh landscape and is different in terms of landform and land use. It is acknowledged that there are ‘hill’ areas included in the Marshes LLD on Sheppey for example Isle of Harty, which is contained by the lower marshland landscape. In the case of Graveney Hill and Cleve Hill it is part of a larger arable landscape and includes the large substation development. It is therefore recommended that this small anomalous area is removed from the LLD. 5. Stone Arable Farmlands -The existing boundary includes the area around Norman’s Hill/Harty Ferry Cottages, which is more similar to the open arable landscape typical of the character area. The hill does have an important role as the backdrop to the Oare Marshes, but to include it here would not be consistent with other areas of the marsh LLD. It is noted that the small area around Little Uplees including orchards and gravel pits is retained in the LLD and this is appropriate. 6. Arable farmland area north of Bax which is recorded as part of character area 31 and does not retain any wetland/marshland characteristics noting that the adjacent minor tributary valley is included, although this is now largely under intensive covered fruit growing. Boundary consistent with character area.
<p>Commentary on Technical Paper 6 2014</p>	<p>The Paper identified the area as intact. It made three recommendations for future review:</p> <ol style="list-style-type: none"> i) Graveney Arable Farmlands – recommended for deletion - see above ii) Graveney Marshes - the report suggests a review of this area to reflect the deterioration in landscape quality. This study indicates that it should be retained within the LLD designation in line with other large areas of improved marsh as qualities of openness, remoteness are dominant. iii) Stone Arable Farmlands area around Little Uplees – it is appropriate that the northern part of the character area which includes small areas of grazing marsh, minor hill with settlements and orchards and the former Oare gravel workings now open water/wetland habitats is included as part of the LLD. The LCA describes the ecological integrity in this area as strong. See above re proposal for redrawing

Candidate LLD name	North Kent Marshes: South Swale Marshes
	boundary to delete the area around Norman's Hill/Harty Ferry Cottages which is part of the open arable landscape that backs much of the marshes.
Stage 4: Recommendation	Retain as LLD with some minor boundary adjustments to provide a more robust inland edge reflecting the extent of this landscape including areas of marsh that extend inland. Provide a separate description and statement of significance to bring out particular character and qualities of the South Swale Marshes, part of the wider North Kent Marshes.

Evaluation - North Kent Marshes: South Swale Marshes	
Criteria	Summary
Local distinctiveness and sense of place	<p>A highly distinctive landscape forming part of the wider North Kent Marshes - a vast and complex area of saltmarsh and mud flats isolated by the sea wall, coastal grazing marsh drained by a network of dykes and ditches as well as small areas of improved farmed marsh dissected by drainage channels. It incorporates the channel of the Swale, including the shifting sand banks and mudflats of Fowley Island joining the marshes on Sheppey. Tidal creeks at Milton, Conyer, Oare and Faversham are unique to this part of the Swale coast and the presence of boats and boatyards along the creeks, including traditional craft and Thames barges further enhances local distinctiveness. Faversham is a historic centre for boat building and repair.</p> <p>The whole area has a strong sense of place, with high levels of remoteness, wildness and isolation, much only accessible on foot; these are all rare qualities in SE England.</p> <p><i>Fully meets</i></p>
Landscape quality (condition and intactness)	<p>On the whole this is a landscape in good condition, has strong ecological integrity, and is largely intact with few detracting features. It has an open coherent visual character.</p> <p>Some areas for example on Graveney/Nagden marshes and around Bax west of Conyer have been reclaimed and converted to intensive arable farmland with a more uniform character lacking diversity of the marshes although maintain visual integrity as part of a flat empty, low lying landscape. Other detractors include the overhead power lines which are prominent in the landscape, and to the west industry on the edge of Sittingbourne. Small areas of gravel working have been reclaimed and the open water at Little Murston and Uplees is a positive feature within the marshes, while at Conyer a former brickworks site is similarly reclaimed and used for recreation. The size and scale of the marshes as a whole means that the influence of detracting features is minimised.</p> <p><i>Fully meets</i></p>
Scenic qualities	<p>The area has strong scenic qualities: high levels of tranquillity, remoteness and relative darkness persist over the marshes in combination with the marshes on Sheppey. A flat landscape with dramatic skies which reflect changes in climate and light provide reservoirs of darkness at night and vast panoramic views, backed by the rising slopes of The Blean and the downs to the south.</p> <p>The strong sense of wildness and remoteness is enhanced by the rich wildlife, sight and sounds of waders and wildfowl often in great numbers, relative absence of building and roads and limited access via rights of way and along the sea walls. Traditional boats add to the scenic quality along the tidal creeks, as do colourful displays of saltmarsh plants - golden samphire, sea-lavender and sea-purslane.</p> <p><i>Fully meets</i></p>
Landscape values (stakeholder)	<p>The area as a whole received a number (8) of consultation responses. It is clearly highly valued by stakeholders for a range of reasons. Graveney Marshes attracted a high number of responses relating to its wildlife habitats, built heritage, panoramic views across land and water to surrounding backdrop of the Blean, Downs and Sheppey, wildness and tranquillity. Luddenham and Conyer Marshes are similarly valued for their farming and biodiversity. The continuous right of way link along the sea wall</p>

Evaluation - North Kent Marshes: South Swale Marshes	
Criteria	Summary
	<p>is particularly valued by stakeholders.</p> <p>The EA notes the importance of this area of implementation of the Medway Estuary and Swale Shoreline Management Plan and its future role in managed realignment.</p> <p>These marshes are important for recreation and are accessible via the Swale Heritage Trail and Saxon Shore Way promoted routes. The nature reserves at Little Muston, Oare Marshes, North and South Swale are valued for informal recreation opportunities and notably birdwatching. The tidal creeks include numerous moorings, marinas and boatyards and the waterways and adjacent coast are well used for sailing including traditional Thames barges based at Faversham.</p> <p><i>Fully meets</i></p>
Natural and cultural attributes & associations	<p>The area is extensively designated as SSSI, Ramsar and SPA, with National Nature Reserves as well as a number of Local Wildlife Sites. These include areas of saltmarsh, mudflats, coastal grazing marsh, freshwater dykes and reedbeds. It is of international importance for migratory, overwintering and breeding wetland birds. At low tide the seals hauled out on Fowley Island are a further distinctive feature.</p> <p>The marshes have a many cultural association including defensive role in WWII and associations with smuggling. Oare Marsh was the site for the manufacture of gunpowder from 1787 until 1916. The remains of the jetty linking Oare to Harty on the Isle of Sheppey, are still visible. Historic buildings located at the edge of the Marsh are features including the Grade I listed church at Luddenham.</p> <p><i>Fully meets</i></p>
Recommendations	<p>The area fully meets the criteria for LLD with some minor boundary adjustments to provide a more robust inland edge reflecting the extent of marshland landscape and potentially the small scale adjoining orchard landscape at Conyer/Teynham.</p> <p>The key requirement for this area is to conserve and enhance identified qualities, notably sense of remoteness and wildness avoiding further development/deterioration necessitating future deletions and boundary adjustments.</p>

North Kent Marshes - South Swale Marshes



- Kent Downs AONB**
- Local Landscape Designation (LLD)**
- Boundary Changes**
- 1 Southern boundary extensions to follow the character area boundary
 - 2 Extension to include whole of Graveney grazing marshes
 - 3 Potential for larger boundary extension include part of former Tonge and Luddenhams AHLV Swale Level
 - 4 **Deletion of Graveney Hill – Cleeve Hill (part of Graveney Arable Farmlands)**
 - 5 Deletion of Norman's Hill (part of Stone Arable Farmlands)
 - 6 Deletion of area north of Bax (arable farmland, part of Tonge and Luddenhams)



Canterbury D

Cleve Farm

Graveney Hill Farm

Swan Poultry Farm

Denley Hill Farm

