

**From:** [REDACTED]  
**To:** [Cleve Hill Solar Park](#)  
**Cc:** [REDACTED]  
**Subject:** KCC / SBC / CCC Submission at Deadline 3  
**Date:** 31 July 2019 16:18:00  
**Attachments:** [REDACTED]

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Good afternoon,

Following on from the Issue Specific Hearing on the 23 July. Please find attached a review of the Landscape and Visual Impact Assessment of the Cleve Hill Solar Park contained in the Environmental Statement (ES) prepared in November 2018 carried out by LUC. This report was commissioned by Kent County Council on behalf of Kent County Council, Swale Borough Council and Canterbury City Council.

It is requested also that the Examining Authority notes the following commentary on behalf the three authorities:

There have been some very recent updates to the [Natural Environment section of Planning Practice Guidance](#) released on 21st July 2019, which align with the updated NPPF. These are relevant to the Cleve Hill Solar Park.

The new guidance reflects a change of emphasis with regard to local designations, by specifically referencing locally-designated landscapes. It explains that policies to identify their special characteristics are supported by proportionate evidence and sets out how plans can include policies to avoid adverse impacts on landscapes.

This is important to this examination. Not only is the Cleve Hill Solar Park site currently within a local landscape designation - the Area of High Landscape Value - Kent Level, this has been confirmed through the recent LUC report 'Swale Local Landscape Designation Review and Recommendations, October 2018' which was reported to and agreed at the Swale Local Plan Panel in November 2018. As noted at hearings (and followed up at Action Point 1 from Specific Issue Hearing 1 on Need) due to reasons of landform and landuse, including the building of the existing Cleve Hill substation, the boundary of the local landscape designation has been amended at this location to remove an area around Cleve Hill and Graveney Hill from the designation. However, the vast majority of the site for Cleve Hill Solar Park is confirmed worthy of local landscape designation.

The LLD Review and Recommendation sets out the key requirements for this designation as follows: 'to conserve and enhance identified qualities, notably sense of remoteness and wildness avoiding further development/deterioration necessitating future deletions and boundary adjustments.'

This updated guidance should be referenced in any further landscape related submissions made on the Cleve Hill Solar Park.

If you have any queries, please let me know

Kind regards,

**Francesca Potter MRICS | Senior Strategic Planning and Infrastructure Officer |**

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# Cleve Hill Solar Park: Review of Landscape and Visual Impact Assessment, submitted as part of the Environmental Statement

## Final Report

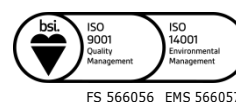
Prepared by LUC on behalf of Kent County Council

July 2019

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**Project Title: Cleve Hill Solar Park Review of Landscape and Visual Impact Assessment, submitted as part of the Environmental Statement (Final Report)**

**Client:** Kent County Council

Version	Date	Version Details	Prepared by	Checked by	Approved by
1	01 July 2019	First draft to KCC	KA	KA	KA
2	29 July 2019	Final report, responding to KCC comments	KA	KA	KA

# 1 Introduction

- 1.1 LUC was commissioned by Kent County Council (KCC) to undertake a review of the Landscape and Visual Impact Assessment of the Cleve Hill Solar Park contained in the Environmental Statement (ES) prepared in November 2018.
- 1.2 In June 2018 LUC was commissioned by KCC to undertake a review of the LVIA contained in the Preliminary Environmental Information Report (PEIR). The Applicant's response to these comments is provided in Technical Appendix A7.5 Consultation Comments (LUC Comments on behalf of KCC, SBC & CCC).
- 1.3 The information presented in the following chapters updates the earlier LUC report and considers how the conclusions and recommendations on the LVIA in the PEIR have been taken into account in the final environmental assessment.
- 1.4 The LVIA is contained in Volume 1 Chapter 7 of the Environmental Statement, with supporting Figures in Volume 2, Viewpoint photography is in Volume 3. It is also supported by a series of Technical Appendices in Volume 4.
- 1.5 The information in this review is primarily concerned with the effects of the operational solar park development on landscape and visual resources. It does not cover the residential amenity assessment.

## The Scheme

- 1.6 This section sets out the scope of the Solar Park Development and any changes from the PEIR scheme. The key parameters relevant to the LVIA are set out in Chapter 5 Development Description.

### Key parameters relevant to LVIA

- Total site area of 491.2 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);
- A large site extending 2.9km across in an east to west direction and 1.7km in a north south direction.
- Around 884,388 Solar PV modules/ 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;
- Panels will be arranged in an east-west direction with overall heights ranging from 3m – 3.9m.
- The tables will be arranged across 23 'fields' across the development site reduced from the PEIR of 26 fields;
- 80no transformers across the site, each 8.2m by 2.3m, and 3m high, typically coloured grey;
- An electrical compound of 325m by 250m, surrounded by a soil bund around 35m width across and crest at AOD 5.3mbetween 3.3m and 4.8m above ground level, comprising a total area of 10 ha and containing:
  - a substation, with various components up to 12.8m high; and
  - an electricity storage facility that occupies over half of the compound area, and comprises modules up to 2.2m high;
- 15 km of 2m high deer fencing (timber and stock netting) enclosing the operational area;
- Around 240 CCTV cameras on 3m poles inside the security fence;

- Lighting will be limited to the substation and transformers, and will be sensor-activated;
- A tarmac access road from the existing Cleve Hill sub-station access road
- A stone 'spine road' of around 2.2km in length will provide the main access, with other access via existing farm tracks or grassed tracks; and
- The development site will be grazed by sheep during operation.

1.7 The principal difference to the PEIR scheme is the removal of panels in fields J, Y and Z, which are all on arable land. This releases a small area of extra land for arable reversion and removes panels from fields Y on the sloping land of Graveney and Cleve Hill. This is described in Chapter 5 Development Description but no indication of the area of land is provided. The extent of these fields is shown on Figure 5.1/5.2 in the ES. They are 3 small 'fields' within the total development area of 24 field compartments.

### **Embedded mitigation and enhancement measures**

- 1.8 The LVIA does not clearly set out the embedded mitigation at the outset, apart from the addition of one new permissive footpath through the core area. Review of the ES suggests that this has not changed since the PEIR and in, our understanding, encompasses the following:
- Existing public rights of way through the site will be retained and further new permissive footpath;
  - 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;
  - Other landscape proposals include:
    - establishment of 3.52 km of native-species hedgerows, containing 554 native trees, in the southern part of the development;
    - establishment of 1.3 ha of native woodland shelterbelt in the southern part of the development;
    - establishment of 1.5 ha of native woodland on the bund around the electrical compound; and
    - establishment of 4.3 ha of native species scrub along the northern edge and south eastern corner of the development.

### **Section 42 Consultation**

1.9 In addition to the scoping consultation (see previous LUC report), the LVIA includes information of the Section 42 Consultation of the PEIR which identifies a number of common themes. These are reported in greater detail in Appendix A7.5 which contains Section 42 Applicant Regard to Consultee Responses, which contains a detailed response to KCC's comments a line by line response to the LUC report.

#### **Summary**

*The proposals are summarised at 7.1.1, which sets out worst-case scenario and references the total size of the site. However, the LVIA does not state that total area of panels and does not indicate the extent of fencing and security measures which are also of relevance for the assessment. The LVIA does not clearly set out the embedded mitigation.*

## 2 LVIA Review

### Methodology

- 2.1 This section contains a brief review of the LVIA methodology with reference to how KCC (LUC) comments on the PEIR have been taken into account.
- 2.2 We are pleased to note that the majority of recommended changes have been taken into account in the LVIA chapter. It is also useful to note that landscape and visual effect defined as 'moderate' are also now deemed to be significant in line with other chapters in the ES. Overall the methodology appears fit for purpose, albeit with comments set out below. There remain questions over how it is applied in practice and results are interpreted. The practical implementation of the LVIA is set out below. In particular the summary of this report (in chapter 3), indicates how results have been qualified and to an extent interpreted to indicate a lower level of effect.
- 2.3 Key notes on method are set out below:

### Study area(s) and ZTV

- The definition of multiple study areas - Core Landscape Study Area (CLS), 2km study area and 5 km study is confusing in its approach for the reader and makes results more difficult to interpret.
- The subsequent use of a mix of the CLS and landscape character areas for reporting and summarising landscape effects is difficult to understand. It is assumed that the CLS refers to the site itself.

### Landscape Susceptibility

- Table 7.3 could be clearer in providing an indication of the parameters which might affect susceptibility and make this particular landscape more or less able to absorb this specific development. This information would aid understanding on how the judgements have been made.

### Landscape Value

- The purpose of two separate sets of criteria for designated (table 7.4) and undesignated landscapes (table 7.5) is unclear. It is not apparent why these are included, particularly as it is already established that the proposed development is within a local authority landscape designation and is therefore an Area of High Landscape Value (AHLV).
- Table 7.4 is very unclear as it refers to green belt and TPOs which are not landscape designations (and green belt is not relevant to Swale) and are therefore not considered to be indicators of landscape value.
- The applicant is not clear why landscapes valued by local authority designation for example as AHLV are considered at the same level as Green Belt and TPOs and why they are only given a Local Value. This is the case for the Swale AHLV which is part of a larger designation along the whole of the North Kent Marshes and is therefore established as more than local value.

### Magnitude of landscape effects

- Size/scale – it would be easier to understand this table if it referred to characteristic specific to this development type rather than for example 'tall structures'.
- Geographical extent – it is not clear how this works in practice – 'change will affect all of the landscape receptors' 'medium extent of landscape receptors (table 7.8)'. It is not correct to say that a change has to affect a whole character area to have a large effect.

- The way geographical extent is presented is difficult to interpret for this very large development site. A change defined here at the 'site' level i.e. identified at the lower end of the scale' is in fact a large change in geographical extent in landscape terms.

### Significance

- 'Moderate effects' are now correctly considered to be significant as well as those of 'moderate-major' and 'major'. It is not necessary to state that '*a significant effect of a particular receptor does not necessarily indicate that the overall development is unacceptable*'

### Summary

*The majority of changes identified in relation to the method have been taken into account in the LVIA chapter. It is also useful to note that landscape and visual effect defined as 'moderate' are also now deemed to be significant in line with other chapters in the ES. Overall the methodology follows GLVIA3 and appears fit for purpose, albeit with comments particular in relation to interpretation of landscape value and geographical extent for this very large scale development. There remain some questions over how the method is applied in practice and results are interpreted, as set out below.*

## Baseline

### Landscape Planning Policy Context (7.3.1)

- 2.4 It is helpful that the fact of the site lying within an 'Area of High landscape Value' is established in this section under Policy DM24 of the Swale Local Plan.

### Landscape Character (7.3.2)

- 2.5 This is a comprehensive section with wide scope. Key points are noted below:
- The LCA text for Graveney Marshes Landscape Character Area 5 (where the site is located) also references other characteristics relevant to this particular assessment including 'inaccessible landscape' 'sense of remoteness' 'panoramic views'.

### Landscape and visual context (7.3.3)

- 2.6 This is the CLS and refers to the site. It appears to be an accurate description, although the following points are noted:
- In para. 195, the text notes that the landscape is visually contained partly as a result of the flood defence embankment. While this is to an extent true the overriding consideration must be that the landscape is visually exposed to people as a result of the well-used regionally promoted route of the Saxon Shore Way running on top of the embankment.
  - Para. 227 The seascape to the north of the CLS forms a visual focal point in the landscape (it is unclear how it is a focal point, a focal point from where and why it should be any more of a focal point than the CLS).
  - Para. 227 230 Containment due to the flood bank see comments for para. 195 above

### Landscape Value of the CLS (7.3.4)

- 2.7 The Reference to Technical Paper 6: Interim Review is correct although it is noted that the 2019 update of Swale Local Landscape Designations now supersedes this paper (recognising that this may not have been available at the time of the ES) and concludes that the Local Designation should be retained in this area. It is an AHLV and therefore it is unclear why table 7.18 presents an alternative assessment of the current landscape value of the CLS area using GLVIA Box 5.1 criteria. In our opinion this table is skewed and emphasises negative characteristics such as 'featureless' 'uniform' 'sparse vegetation' 'power lines' and implies that people walking on the Saxon Shore Way on the flood bank are more inclined to look north to the sea rather than enjoy the entire landscape.



- 2.8 Nevertheless, para 244 does conclude that the site is valued at the Local level, however, it goes on to qualify this by saying it is at the lower end of the scale due to being featureless, dominated by intensive agricultural use and the presence of physical detractors. This is an unnecessary qualification. The point of this section is not clear. The LVIA baseline should accept this site is part of a locally designated landscape, rather than seek to downgrade it at the outset. In our opinion it is of more than Local Value since the CLS is an integral part of the much larger wider Kent Marshes.

### Visual Baseline

- 2.9 Residential receptors are usefully provided with a link to the Residential and Visual Amenity Assessment (RVAA). This section does not contain any reference to the ZTV. It should identify the visual receptor groups first prior to selection of viewpoints to represent these views. Visual receptors are not clearly identified.
- 2.10 The 22 viewpoints appear to be appropriate. Further information on the reasoning behind certain viewpoint being selected for visualisations/photomontages would be useful.

### Future Baseline

- 2.11 The section could helpfully refer to the Shoreline Management Policy for this area. The Environment Agency's Draft Medway Estuary and Swale Strategy propose a policy of managed realignment for this area.

### Summary

*The baseline is substantially correct although there are questions on how the AHLV is dealt with. The assessment of landscape value (7.18) remains unclear.*

## Development Design Mitigation

- 2.12 Under section 7.4 the LVIA summarises the measures to mitigate and enhance landscape and biodiversity (see also Technical Appendix A5.2), and improve the integration of development. As noted in the review of the PEIR this is presented prior to the assessment of effects so that the link between impacts and mitigation is not clear. No further mitigation is described following the assessment. It would be useful for the applicant to clarify whether there are measures that could mitigate any of the identified significant impacts on landscape and visual resources. We have assumed that there are no measures that could provide further mitigation such that effects are considered not significant.
- 2.13 As noted in the comments in the PEIR the proposals for additional hedgerow, woodland and tree planting, although their extent is very small in comparison to the size of the solar development and the overall landscape benefit is considered to be limited. It remains the case that screening planting is generally not a positive feature in the landscape which is characterised by its long views and openness. It is also disputed whether scrub planting around and between solar panels would add to the character and sense of wildness and enrich the grassland as stated in the ES.

## Assessment of landscape effects

- 2.14 The section of the LVIA provides a narrative describing the likely effects at construction, operation and decommissioning. This is provided in tabular form in Technical Appendix A7.2 and both the LVIA chapter text and the Technical appendix are referred to below. The following review concentrates on the **operational effects** of the development and sets out the main areas where we consider greater clarity is required in the assessment judgements.
- 2.15 There are some overriding points in the narrative which remain unclear:

- The presentation of information referring to the CLS is confusing for the reader. We understand this to be the site itself. The CLS is therefore a large area encompassing almost the entirety of one landscape character area.
- There is some misleading wording for example stating that the development is low in height, and in comparison to the pylons and telegraph poles. We do not consider that a development of up to 3.9m can be described as low. Pylons and telegraph poles are a very different type of structure for comparison purposes. A development of this horizontal extent and the height of a pylon is inconceivable.
- Throughout, the assessment text frequently refers to the horizontal low lying nature of development to justify conclusions which is incorrect. It should be clarified to state that in views from the elevated sea wall the development sits lower within the landscape.
- The LVIA still includes some judgements without clear justification in relation to judgements in value, susceptibility and magnitude of change which makes it more difficult to interpret.
- A.7.2 describes 'magnitude' at year 1, 5 and 10 – we assume that this refers to the level of effect and not the magnitude of change which is covered elsewhere in the table.
- The purpose for assessing each of the landscape value criteria in table B1 (Appendix A7.2) is not clear. The ES should explain why they have been assessed.
- Assessment of magnitude of change in the LVIA text appears to be focussed on the extent of the landscape receptor that the development would cover rather than effect on character and susceptible characteristics. In our opinion this has the effect of underestimating impacts.

### **Landscape Effects Arising from the Operational Phase**

#### *The CLS*

- We suggest that this area is of higher sensitivity, than Medium. We agree that there would be a Major effect which is significant.
- The A7.2 Table B1 assessment of the sensitivity of each of the criteria for assessing landscape value seems to be an entirely superfluous and circular process and is not required. The landscape value of the CLS is already established through its designation.

#### *National (NCA) and Regional (RLCA)*

- It is not accurate to simply state that because the NCA or RCLA is not a designation it is assessed as being of Community Value. This is inappropriate as the NCA and RCLA may contain many areas of valued landscape and indeed in this instance does contain valued and locally designated landscapes.
- Simply because the development only affects a small proportion of these large areas is not a reason to state that effects are not significant. It is not the extent of the national area that covers but effect on its character.

#### *Swale LCA 5 Graveney Marshes*

- Since this development covers the entire area it is safe to say that the effect will be Major (not Moderate/Major).
- The LVIA is incorrect in assigning this area a 'Community Value' where the baseline has already established that it is within an AHLV – Area of High Landscape Value as a Local Landscape Designation.
- The assessment suggests that sensitivity of LCA 5 is Medium in para 291 and High in para 292. We suggest that it should be High.

#### *Area of High Landscape Value (Policy DM24)*

- The assessment text once again states that the horizontal and low-lying nature of the Development would retain open views across the AHLV including from the Saxon Shore Way. This cannot be the case as views will be to a large solar farm and not 'open views'.

- The AHLV is described as being of Local significance for Kent – we confirm that it should be assigned greater than Local significance.
- It is not clear why the sensitivity is high for the CLS area and low for majority of the AHLV. The sensitivity should be the same for the entire AHLV – although the effects may vary with distance from the development.
- Visual containment by the flood defence is not to be relied on as the flood bank also creates visual exposure for people across the development. It is not correct to say that the development would retain open views from the Saxon Shore and it is important to note that the Saxon Shore Way is in the AHLV and not outside it.
- It is not correct to say that the relevant characteristics of the landscape are generally able to accommodate the development and therefore susceptibility is Low (as stated in A7.2 and contradicts other text).
- It is not clear why the effects are different for the areas of the AHLV within and outside the CLS
- It is considered that effects on the AHLV are Major (within and outside the CLS) and not Major/Moderate and Moderate/Minor. A7.2 is especially confusing with regard to the AHLV which assess effects as Moderate.
- The table describing the magnitude of change relating to the different criteria used to assign landscape value is difficult to understand and unnecessary although does indicate all affects to be substantial at operational phase.

#### *Area of High Landscape Value (Policy LB2)*

- Despite being in different LPA area and subject to different policies (Swale and Canterbury), this is essentially the same local landscape designation. While it might not be possible to see the development at 1km distance from the site – this will be a very large development in the context of the whole designation along the North Kent Marshes which is for the most part entirely undeveloped.

#### *Decommissioning*

- 2.16 Given that effects of the solar panel development are negative it is unclear why the removal of solar panels is also considered to be negative.

#### **Summary**

*Some judgements are not clearly justified and there remains some qualification stressing that development would 'fit' this landscape.*

*There is confusion in the way results are presented in relation to landscape value. The landscape value of the area should also be recognised in the judgements for the CLS and relevant LCA and not just the AHLV.*

## Assessment of visual effects

- 2.17 The following review concentrates on the **operational effects** of the development and sets out the main areas where we consider greater clarity is required in the assessment judgements. Effects on residential receptors are reported in the RVAA (Technical Appendix A7.4) and are not considered further here.
- 2.18 Significant visual effects of moderate are above are reported for the National Cycle Network, Saxon Shore Way – proposed England Coast Path (ZR484), PRoW ZR485 and ZR488. These are considered to be correct, although the following points are noted.

#### *Saxon Shore Way*

- We agree that there will be a major effect. The assessment text does not set out sensitivity which for walkers we consider would be high. It is noted that the path will be adjacent to the

development for approx. 5km. Walkers enjoying this route will therefore see the development for 1 – 2 hours.

- It is not necessary to qualify the judgement that for the vast majority of the Saxon Shore Way there will be no visibility of the development at all. Most recreational receptors will be enjoying this part of the route as part of repeat recreational visits and not walking the whole route.

#### *PRoW ZR485*

- We agree that here will be a significant effect for recreational receptors. The LVIA records Major/Moderate but in our opinion it will be Major given that the ProW runs through the development and will be contained and enclosed by panels. The reasoning behind the sensitivity of walkers on this route being only medium is unclear. It should be high.

#### *PRoW ZR488*

- We agree with the assessment of significant effects for recreational receptors along this route.

### **Summary**

*Some judgements are not clearly justified and require the reader to refer to the Technical Appendix. Some results are qualified, for example the fact that the development will only be seen along a small part of the overall Saxon Shore Way (Gravesend to Hastings) when most recreational receptors will be making walks as repeat visits along this part of the route and are likely to see the development for the entire duration of their journey.*

## 3 Summary and conclusions

- 3.1 Section 7.9 of the LVIA presents a summary of effects. Document 6.51 of the ES sets out the Non-Technical Summary (NTS). This chapter reports our overall conclusions.

### Summary of Effects

- 3.2 The summary seeks to minimise the extent of significant effects by inserting a large number of qualifiers such as:

“low lying character of the Development”

“contained by the flood defence”

“Low lying horizontal nature of the development”

- Emphasis on existing infrastructure on the site such as pylons and sub-station which is inappropriate since they are an entirely different scale and form
- Stating the positive effects of enhancement measures such as creation of grazing marsh which are only a very small proportion of the overall site”
- Over reliance on mitigation to limit effects and integrate development into the local landscape which overlooks the scale of the development in relation to the amount/type of mitigation proposed

- 3.3 Furthermore it does not accurately report the judgements recorded in the LVIA, as set out below.

### Landscape Effects

- Inaccurately summarises overall Moderate effects on the AHLV which does not describe conclusions in the LVIA
- Reports significant effects (Major) on LCA5 Graveney Marshes but fails to record the Major effects on the CLS – which provides a major part of the assessment in 7.5.21.

### Visual Effects

- Makes an obvious statement that operational effect on visual amenity will be greatest close to the CLS area.
- Records that views will remain ‘open’ from the Saxon Shore Way when in fact there will be views to the solar development experienced by recreational receptors for some 5km along this route. Noting that for most recreational receptors this is likely to be for the entire duration of their visit to this part of the Shore Way.

### Statement of Significance

- 3.4 This records significant effects on the Saxon Shore Way and residential properties. It does not refer to the significant effects on either the AHLV or the relevant landscape character area, identified in the LVIA replacing this with more general text about the CLS Area. This is an omission.
- 3.5 The purpose of this statement is unclear as rather than reporting the result of the LVIA it seeks to justify the development – which is not the purpose of the ES. For example in para 482 it states:

*“Whilst the Development introduces man-made structures across a large proportion of a large area of land the uniform arrangement of Development in what is assessed as an open and featureless landscape; together with the low profile of the majority of the Development introduces what has been assessed as a quantum and type of development this landscape can accommodate due to the low-lying horizontal and uniform nature of the Development together with mitigation planting. The sense of openness, remoteness and tranquillity will remain in all locations except within the area where solar PV modules and the electrical compound are located”.*

3.6 This concluding statement is clearly circuitous and illogical for a number of reasons:

- The LVIA itself identifies significant landscape effect for a number of receptors so that it is inaccurate to describe it as being able to accommodate such development.
- The entire CLS area is mostly filled with development and therefore it does not make sense to say remoteness and tranquillity will be maintained within it in all areas except where there is development.
- It is not an open and featureless landscape – this is just one characteristic that is presented in a negative way here. It does not describe the positive characteristics that are adversely affected by the development.
- Mitigation planting appears to overlook the scale of the solar panels compared to the scale of planting proposed.
- The development at up to 3.9m height cannot be described as low profile.

3.7 Finally the statement concludes that:

*"The effect of the development will be highly localised especially given the scale of the development and have limited geographical extent in which the development will be seen or will affect the landscape, and are therefore it is considered to be acceptable from a landscape and visual perspective".*

Our comments on this statement are as follows:

- The purpose of the LVIA is to report significant effects and not go on to make a judgement on whether they are acceptable or not.
- The statement relating to a limited geographical area is disingenuous as while it may be the case that significant effects do not extend far beyond the site boundary, the area physically impacted by the development is very large.
- The scale of the development is not clearly acknowledged – it virtually fills an entire character area. There are very few developments of such a scale and even small developments within a small part of a character area can have significant effects.
- It is inappropriate to conclude that landscape and visual effects are 'highly localised' as this does not take into account the overall scale of the development such that impacts occur over the entirety of the development area.

### **Non-Technical summary**

3.8 The Landscape and Visual Effects of the development are reported in the Non-Technical Summary of the ES (document Ref 6.51). This reports the significant effects on landscape and visual receptors. There are a number of points to note:

- Para. 105 reports that the flood bank removes the visual relationship with the Swale. This is true to an extent but for the main visual receptors - people walking along the Saxon Shore Way on the flood bank - the opposite is true in that it provides a wide view across the Swale and the development site, which are viewed together.
- Para. 110 emphasises the significant effects would have the most influence on landscape and visual receptors within a short distance of 1 km from the solar park site. Again this is true, however it fails to record the enormous extent of the site itself, some 491.2 hectares (ha), and extending 2.9km across in an east to west direction and 1.7km in a north south direction.

