From:
To: Cleve Hill Solar Park
Subject: Acolaid Case PRE/17/00490
Date: 01 August 2019 16:01:49

Attachments:

Dear Sir,

Please see the attached written submission from CCC regarding the landscape matters.

Kind Regards,

Joanna Dymowska

Canterbury City Council

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Telephone: Contact Centre 01227 862178
Email: planning@canterbury.gov.uk
Website: www.canterbury.gov.uk/planning

Date: 01 August 2019

Cleve Hill Solar Park Freepost Cleve Hill Solar



Dear Sir/Madam

TOWN AND COUNTRY PLANNING ACT 1990 PRE-APPLICATION ENQUIRY

Our Ref: PRE17/00490

Proposal: Nationally significant infrastructure project (solar park).

Location: Land at Cleve Hill, Graveney, Faversham

I am writing in relation to the above application for development consent made to the Planning Inspectorate and its current examination.

In paragraph 28 of its Local Impact Report (LIR) submitted on 31st July 2018, CCC advised that it would provide further comments once an independent assessment on the landscape impact of the proposed development had been carried out. Since the issue specific hearing on 23rd July 2019, CCC have reviewed the independent assessment and remain of the view that the proposed development would have a detrimental impact on the setting of the Seasalter Marshes Landscape Character Area (LCA) and the North Kent Marshes Area of High Landscape Value (AHLV). However, CCC wish to make the following additional comments on landscape and visual amenity matters, particularly in relation to the methodology and choice of viewpoints used to inform the Applicant's Landscape and Visual Impact Assessment (LVIA) and the Applicant's assessment of the landscape effects of the proposed development.

Methodology

Overall, CCC raise no objections to the methodology used in the LVIA submitted by the Applicant. However, CCC consider that the landscape should be considered to be of more than local value, given that it forms part of a larger Kent Marshes designation that crosses the administrative area of CCC into Swale that shares similar characteristics.

Choice of viewpoints

No objection is raised in relation to the viewpoints chosen in the LVIA. However, CCC endorse the view of the Examining Authority that further justification should be put forward in relation to the use of different scales/cropping of the photomontages showing the visual effects of the proposed development.

Effects of proposed development

As confirmed at the issue specific hearing, the solar panels would not be directly adjacent to the CCC's administrative boundaries.

The LVIA concludes that the characteristics of the landscape can accommodate the proposed development but elsewhere in the report, it identifies significant landscape effects. In addition, There is also a lack of consistency in reporting the sensitivity of and extent of effects on the LCA and AHLV.

In addition, the LVIA states that the proposed development is low-lying in nature, however the solar panels would be 3.9m in height, cover a significant area of land and would be visible in long-range views from the surrounding area. Comparisons are also made in the LVIA between the proposed development and existing pylons within the landscape, however this is not considered appropriate given the differing nature of these developments in terms of horizontal vs. vertical extent.

Proposed mitigation

Whilst it is stated that the LVIA is based on a worst-case scenario, no details of the security measures such as fencing and CCTV have been secured in the DCO application. These are considered to be relevant to the consideration of the landscape impacts of the proposed development. Should further details be submitted, CCC will review this information and provide its comments at the relevant stage of the examination.

In addition, the extent of mitigation proposed is considered small and limited in relation to the scale of the proposed development. Furthermore, the appropriateness of the proposed landscape is questioned as this would be at odds with the openness and long-ranging views that are characteristic of the landscape.

Should you require any further information, please do not hesitate to contact me.

Kind regards.

Joanna Dymowska Principal Planning Officer Canterbury City Council