



KENT DOWNS AONB UNIT - Unique Ref 20035310

WRITTEN REPRESENTATION

APPENDIX 1

**Detailed comments on the Assessment of Effects reported in Chapter 7 of the Environmental statement (LVIA)
on receptors pertinent to the
Kent Downs AONB.**

VISUAL RECEPTORS

View point	Visual Receptor	Sensitivity	Magnitude of effect (Construction) & Significance	Magnitude of effect (Opening Year Winter) & Significance	Magnitude of effect (Year15 Summer) & Significance	AONB Unit commentary
S03	View from the Kent Downs AONB on footpath NS161, located north of Park Pale, east of Shorne Woods Country Park (LLCA West Kent Downs (sub area	Very High <i>(2020 – Very High)</i>	Moderate = Large adverse effect <i>(2020 Moderate = Large adverse effect)</i>	Negligible = Slight adverse effect <i>(2020 Negligible = Slight adverse effect)</i>	Minor = Moderate beneficial effect <i>(2020 Minor = Moderate beneficial effect)</i>	<p>Strongly disagree with assessed Magnitude of effect. At present from this view the A2 corridor is almost entirely screened by vegetation and HS1, despite being elevated, only readily apparent when a train goes past due to maturing vegetation on the embankment. Harlex Haulage Depot at Park Pale is partially screened in Summer, less so in Winter. Views are currently across grassland to the woodland to the south beyond, with views possible of the roof of the Darnley Mausoleum.</p> <p>The scheme will remove existing vegetation to the north of the Harlex Depot, to facilitate a new access track to the attenuation pond, opening up views of the haulage yard. The new access proposed to the Depot to the west of the existing site will also be in close-up views. Existing screening planting to the north of the A2 and between the A2 and HS1 would be removed.</p> <p>The higher topography of the Viewpoint means the works will be particularly visible over the proposed planting until it has really matured.</p> <p>It is considered that the Magnitude of effect is underestimated for all 3 scenarios, however in particular for Year 1 as planting will not have established at all and the views of the widened infrastructure, HS1 and Park Pale will all be much more apparent in the view than at present. Consider that a Major Magnitude of effect at Construction and Year 1 would be more realistic and Minor adverse at Design year.</p>

						With a Very High sensitivity and Minor adverse effect this equates to a Moderate adverse and significant residual effect.
SO4	View from the Kent Downs AONB on Park Pale	High <i>(2020 – Very High)</i>	Moderate = Large adverse effect <i>(2020 Moderate = Large adverse effect)</i>	Moderate = Moderate adverse effect <i>(2020 Moderate = Large adverse effect)</i>	Moderate = Moderate adverse effect <i>(2020 Moderate = Large adverse effect)</i>	As the Viewpoint is located on a Public Right of Way and NCR, it should be assigned as having Very High sensitivity. Agree with the assessed Magnitude of effect. With a Very High sensitivity and Moderate adverse effect this equates to a Large adverse and significant residual effect.
SO5	View from the Kent Downs AONB on Park Pale overbridge -view centred NNW	High <i>(2020 – Very High)</i>	Major = Very Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Major = Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Moderate = Moderate adverse effect <i>(2020 Major = Very Large adverse effect)</i>	As the Viewpoint is located on a Public Right of Way and NCR, it should be assigned as having Very High sensitivity. Agree with the assessed Magnitude of effects. The highway corridor would be more intrusive than existing with additional lanes and the replacement planting does not replicate the existing situation with much less vegetation overall (including between the E and W carriages) and the replacement of trees adjacent the highway with grass. With a Very High sensitivity and Moderate adverse effect this equates to a Large adverse and significant residual effect.
SO5a	View from the Kent Downs AONB on Park Pale overbridge – view centred West	High <i>(2020 – Very High)</i>	Major = Very Large adverse <i>(2020 Major = Very Large adverse effect)</i>	Major = Large adverse <i>(2020 Major = Very Large adverse effect)</i>	Moderate = Moderate adverse <i>(2020 Major = Very Large adverse effect)</i>	As the Viewpoint is located on a Public Right of Way and NCR, it should be assigned as having Very High sensitivity. Agree with Construction and Opening Year effects. Strongly disagree that this would reduce to Moderate at Year 15, justified in the ES on the basis of new planting, given that the highway corridor would be more intrusive than existing with additional lanes, gantries and signage and the replacement planting does not

						<p>replicate the existing situation with much less vegetation overall (including the loss between the East and West carriages) and the replacement of trees adjacent to the highway with grass. The residual impacts are demonstrated in a photomontage. The Magnitude of effect is considered to remain Major adverse at Year 15, as assessed in the 2020 Report.</p> <p>With a Very High sensitivity and Major adverse effect this equates to a Very Large adverse and significant residual effect.</p>
S06	View from the Kent Downs AONB and the Grade I listed Darnley Mausoleum and Darnley Trail – view NNW	Very High <i>(2020 – Very High)</i>	Negligible = slight adverse effect	No change = Neutral	No change = Neutral	Agree.
S07	View from the Kent Downs AONB on footpath NS182 within Rochester and Cobham Park Golf Club – view NNW	Very High <i>(2020 – Very High)</i>	Negligible = slight adverse effect	Negligible = Slight adverse effect	Negligible = Slight adverse effect	Agree.
S08	View from the Kent Downs AONB on footpath NS179, within Cobham Hall – View WNW	High <i>(2020 – Very High)</i>	Moderate = Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Moderate = Moderate adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Minor = Slight adverse effect <i>(2020 Major = Very Large adverse effect)</i>	<p>As the Viewpoint is located on a Public Right of Way, it should be assigned as having Very High sensitivity.</p> <p>Agree there would be a Moderate magnitude of effect at Construction and Opening Year. The planting between the PRoW and HS1 would remain and is just starting to mature and provide mitigation for the railway line, however tree planting between the railway and the A2 would all be removed, opening up views of the widened highway.</p> <p>It is proposed to replace some of the removed trees with woodland planting, but the tree belt would not be as wide and not as effective in screening and providing separation between the footpath and the widened highway. Furthermore, as demonstrated</p>

						<p>with the HS1 mitigation planting, which is approximately 20 years old, it is not agreed that the planting would be wholly effective at Year 15.</p> <p>It is therefore considered that the Magnitude of Change would remain Moderate at Design Year.</p> <p>With a Very High sensitivity and Moderate adverse effect this equates to a Large adverse and significant residual effect.</p>
S09	View from the Kent Downs AONB on Park Pale/Darnley Trail/NCN Route 177, adjacent to Brewers Wood, part of Shorne Woods Country Park – View S	High <i>(2020 – Very High)</i>	Moderate = Moderate adverse effect <i>(2020 Moderate = Very Large adverse effect)</i>	Moderate = Moderate adverse effect <i>(2020 Moderate = Very Large adverse effect)</i>	Minor = Slight adverse effect <i>(2020 Moderate = V Large adverse effect)</i>	<p>As the Viewpoint is located on a Public Right of Way and NCN, it should be assigned as having Very High sensitivity.</p> <p>Agree with assessed Magnitude of effects at all stages.</p> <p>With a Very high sensitivity and a Minor Magnitude of effect this equates to a Moderate or Large Adverse and significant residual effect.</p>
S10	View from the Kent Downs AONB on a path within the Pleasure Grounds at Cobham Hall View - NNW	Very High	Negligible = Slight adverse effect	Negligible = Slight adverse	No change = Neutral	Agree.
S11	View from the Kent Downs AONB on footpath NS179 within Cobham Hall View - NNW	Very High <i>(2020 – Very High)</i>	Moderate = Large adverse effect <i>(2020 Moderate = Large adverse effect)</i>	Moderate = Large adverse effect <i>(2020 Minor = Moderate adverse effect)</i>	Minor = Moderate adverse effect <i>(2020 Negligible = Slight adverse effect)</i>	<p>Agree there would be a Moderate adverse Magnitude of effect at Construction and Opening Year due to extensive tree loss adjacent to Brewers Road – although trees within the Park and to the south of HS1 would remain and provide some screening.</p> <p>The proposed replacement planting on Brewers Road embankment is mainly chalk grassland, with some scattered trees and shrubs interspersed with trees on the east side of the new green bridge which would filter, rather than screen, views. Therefore, it is considered the assessed Minor magnitude of effect at Design year is over optimistic and would be more realistically assessed as remaining Moderate.</p>

						With a Very High sensitivity and Moderate adverse effect this equates to a Large adverse and significant residual effect
S12	View from the Kent Downs AONB on Brewers Road/Luddesdown Trek/NCN Route 177*, adjacent to Brewers Wood/Shorne Wood – View SSW	High <i>(2020 – Very High)</i>	Moderate = Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Moderate = Moderate adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Minor = Slight beneficial effect <i>(2020 Moderate = Large adverse effect)</i>	As the VP is located on a public Right of Way, it should be assigned as having Very High sensitivity. Agree with assessed Magnitude of effects.
S13	View from the Kent Downs AONB on Brewers Road overbridge – View S	High <i>(2020 – Very High)</i>	Major = Very Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Major = Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Minor = Slight beneficial effect <i>(2020 Moderate = Large adverse effect)</i>	Agree with assessed Magnitude of effects at Construction with loss of wooded central reservation and views of entire widened highway visible. However, do not consider that the Green Bridge planting would offer the level of filtering of views shown in the Photomontages and that there would still be a Very large adverse effect at Opening Year. It is also considered that the predicted Slight beneficial effect at Design Year is over optimistic in terms of the achieved mitigation, particularly during winter months and that Minor adverse would be a more accurate assessment.
S14	View from the Kent Downs AONB on Brewers Road overbridge - View NE	High <i>(2020 – Very High)</i>	Major = Very Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Major = Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Minor = Slight beneficial effect <i>(2020 Moderate = Large adverse effect)</i>	Agree with assessed Magnitude of effects at Construction with loss of wooded central reservation and views of entire widened highway visible. However, do not consider that the Green Bridge planting would offer the level of filtering of views shown in the Photomontages and that there would still be a Very Large adverse effect at Opening Year. It is also considered that the predicted Slight beneficial effect at Design Year is over optimistic in terms of the achieved mitigation, particularly during winter months and that Minor adverse would be a more accurate assessment.

S15	View from the Kent Downs AONB on footpath NS178 located adjacent to the Halfpence Lane roundabout – View N	High <i>(2020 – Very High)</i>	Moderate = Moderate adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Minor = Slight adverse effect <i>(2020 Major = Very Large adverse effect)</i>	No change = Neutral <i>(2020 Minor = Moderate adverse effect)</i>	As the VP is located on a public Right of Way, it should be assigned as having Very High sensitivity. Consider Magnitude of effect underassessed at Construction and Opening Year, given extent of works and proximity of viewpoint to them and lack of time for planting to provide mitigation.
S16	View from the Kent Downs AONB and Randall Heath Woods, on a permissive path within Shorne Woods Country Park - View SSW	Very High <i>(2020 – Very High)</i>	Minor = Moderate adverse effect <i>(2020 Minor = Moderate adverse effect)</i>	Minor = Moderate adverse effect <i>(2020 Minor = Moderate adverse effect)</i>	Negligible = Slight adverse effect <i>(2020 No change = Neutral)</i>	The view is heavily filtered by existing woodland. Agree with Assessment.
S17	View from the Kent Downs AONB on the NCN Route 177*/Timeball and Telegraph Trail Long Distance Path, on Thong Lane adjacent to the Inn on the Lake Hotel – View S	High <i>(2020 – Very High)</i>	Major = Very Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Major = Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Moderate = Moderate adverse effect <i>(2020 Major = Very Large adverse effect)</i>	As the VP is located on a public Right of Way, it should be assigned as having Very High sensitivity. Agree with assessed Magnitude of effect. With a very high sensitivity and moderate adverse effect this equates to a Large adverse and significant residual effect.
S18	View from the Kent Downs AONB on the HS1 green bridge and	Very High <i>(2020 – Very High)</i>	Major = Very Large adverse effect	Major = Very Large adverse effect	Moderate = Large adverse effect	Agree.

	Timeball and Telegraph Trail – View NW		<i>(2020 Major = Very Large adverse effect)</i>	<i>(2020 Major = Very Large adverse effect)</i>	<i>(2020 Major = Very Large adverse effect)</i>	
S29	View from the Kent Downs AONB on Shorne Ifield Road located to the north of Shorne Woods Country Park – View NW	High <i>(2020 – Very High)</i>	Major = Very Large adverse effect <i>(2020 Major = Very Large adverse effect)</i>	Minor = Slight adverse effect <i>(2020 Minor = Moderate adverse effect)</i>	Minor = Slight adverse effect <i>(2020 Negligible = Slight adverse effect)</i>	<p>Although the VP is not located on a Public Right of Way, it is on a minor road close to an access point to Shorne Country Park that forms part of the local walking route network on the boundary of the AONB and it should therefore be assigned as having Very High sensitivity, as it was in the 2020 Assessment.</p> <p>It is agreed that there would be a Major Magnitude of effect at Construction, but it is not agreed that this would reduce to Minor at Opening Year, due to the effects of lighting and earthworks, as yet unmitigated by planting and still forming a large component of the view.</p> <p>By Design Year, the proposed Ancient Woodland compensation planting would largely obscure views northwards from this viewpoint and existing long views towards the Thames will be lost.</p>
NDep RV-02	View from footpath KT/NS/159. Also represents views from footpath KT/NS/156 – View SW	Very High		Negligible = Neutral	Moderate = Moderate beneficial effect	Agree
NDep-RV-05	View from the junction of footpath MR26 and bridleway MR24, including the Augustine Camino Long Distance Path and Medway Valley Rail Trails – View NW	Very High		Negligible = Neutral	Negligible = Neutral	Agree
NDep RV-06	View from footpath MR601, the NDW and (OS) viewpoint at the	Very High		Negligible = Neutral	Negligible = Neutral	Agree.

	Bluebell Hill picnic site – View SW					
NDep RV-07	View from footpath KH31 and adjacent residential properties along a farm access track off Bell Lane - View SSW	Very High		Negligible = Neutral	Moderate = Moderate beneficial effect	Agree.
NDep RV-08	View from footpath KH31, KH30 and the NDW – View NE	Very High		Negligible = Neutral	Moderate = Moderate beneficial effect	Agree.

LOCAL LANDSCAPE CHARACTER AREAS

LCA's WITHIN THE AONB					
Landscape Receptor	Sensitivity	Magnitude of Effect & Significance (Construction)	Magnitude of Effect & Significance (Opening Year)	Magnitude of Effect & Significance (Design Year)	Kent Downs AONB Unit Commentary
West Kent Downs (Sub area Shorne)	Very High <i>(2020 Very High)</i>	Major adverse = Very Large adverse effect <i>(2020 Major adverse = Very Large adverse effect)</i>	Moderate adverse = Large adverse effect <i>(2020 Moderate adverse = Large adverse effect)</i>	Minor adverse = Moderate adverse effect <i>(2020 Moderate adverse = Large adverse effect)</i>	Agree Sensitivity is Very High. Main impacts are identified as being the modified and widened transport corridor, new earth works and retaining structures, absence of vegetation, greater severance of the landscape, plus beneficial AW compensation and nitrogen deposition sites. Significance of effect is assessed as large rather than very large 'due to the localised nature of effects' – however the effects extend to over 2 km in length within this LCA. It is recognised that there would be a permanent reduction in tranquillity and while some planting lost would be replaced, there would continue to be a permanent increase in the prominence and scale of the A2 corridor.

					<p>Agree that there would be a Very Large Adverse Magnitude of effect at Construction but consider a Moderate Adverse effect would remain at Design Year given the permanent and extensive nature of the effects on key aspects of this LCA. This would align with the 2020 assessment.</p> <p>With a Very High sensitivity and moderate adverse effect this equates to a large adverse and significant residual effect.</p>
West Kent Downs (Sub area Cobham)	High <i>(2020 Very High)</i>	Minor adverse = Moderate adverse <i>(2020 Moderate adverse = Large adverse effect)</i>	Negligible adverse = Slight adverse effect <i>(2020 Moderate adverse = Large adverse effect)</i>	Negligible adverse = Slight adverse effect <i>(2020 Minor adverse = Moderate adverse effect)</i>	<p>Consider that Sensitivity should be Very High, rather than High as per the 2020 Assessment. The LVIA states the presence of the A2 results in some ability to accommodate the Project without substantial loss of overall integrity, giving it a Medium degree of susceptibility to specific change, but this justification isn't applied to the Sub Area of Shorne (see above) in which the actual transport corridor lies.</p> <p>It is advised that impacts would be largely limited to a small part of this LCA and largely be confined to creation of NCN route along public right of way. But it would also involve the loss of HS1 mitigation planting and the wooded central reservation, as well as greater severance of the AONB landscape along with the widened transport corridor and associated infrastructure such as retaining walls, gantries etc.</p> <p>Therefore strongly disagree that Magnitude of effect would be Minor at Construction and Negligible at Opening Year and Design Year which are much reduced effects from the 2020 version. Consider a more realistic assessment would be a Moderate adverse effect at Construction, Year 1 and Year 15.</p> <p>With a Very High sensitivity and moderate adverse effect, this equates to a large adverse and therefore significant residual effect.</p>
West Kent Downs (overview for Sub areas)	Very High <i>(2020 Very High)</i>	Moderate adverse = Large adverse effect	Moderate adverse = Large adverse effect	Minor adverse = Moderate adverse effect	<p>Agree with the assigned Very High Sensitivity.</p> <p>With regards to impacts on the AONB's special character, agree there would be minimal impact on dramatic landform and views, and farmed character. There would however be impacts on woodland and trees and on the special</p>

Shorne and Cobham)		<i>(2020 Moderate adverse = Large adverse effect)</i>	<i>(2020 Moderate adverse = Large adverse effect)</i>	<i>(2020 Moderate adverse = Large adverse effect)</i>	<p>quality of biodiversity rich habitats due to much of this area comprising Ancient Woodland and SSSI. While compensation planting is proposed, this will take years to provide the same level of benefit as that which would be lost and much of which is proposed outside of this LCA. There would also be a reduction in tranquillity as noted in the Assessment.</p> <p>The Significance of effect is assessed as large rather than very large ‘due to the localised nature of effects’ – however the effects extend to over 2 km in length within this LCA.</p> <p>Therefore, while it is agreed that there would be a Very Large Adverse effect at Construction, it is considered that a Moderate Adverse effect would remain at Design Year, as concluded in the 2020 assessment.</p> <p>With a Very High sensitivity and moderate adverse effect, this equates to a large adverse and therefore significant residual effect.</p>
Mid Kent Downs	High		Negligible adverse = Neutral	Moderate beneficial = Moderate beneficial effect	Agree that there would be a residual moderate beneficial effect due to the Nitrogen Deposition planting at Bluebell Hill, however, this should be downgraded to minor beneficial effect if the compensation site area is reduced as proposed in the Minor Refinements Consultation May/June 2023.
Hollingbourne Scarp and Vale	High		No change = Neutral	Negligible beneficial = Neutral	Agree there would be a neutral effect.
Medway Valley (sub area Eastern Scarp)	High		Negligible adverse = Neutral	Minor adverse = Slight adverse effect	Agree – this LCA is included due to the Nitrogen Deposition compensation site at Burham – which it is now proposed will be deleted from the proposal. The proposed planting here of a mosaic of habitat to include woodland planting would be out of landscape character here – with the site better suited to just chalk grassland creation, given the site’s location on the lower slopes of the escarpment of the Kent Downs (woodland would only be expected on the steeper, upper parts of the escarpment).
SETTING:					

Setting – Higham Arable Farmland (Sub area Thong)	High <i>(2020 High)</i>	Major adverse = Very Large adverse effect	Major adverse = Very Large adverse effect <i>(2020 Major adverse = Large adverse effect)</i>	Major adverse = Large adverse effect <i>(2020 Major Adverse = Large Adverse effect)</i>	Agree.
Setting – Istead Arable Farmlands	Medium <i>(2020 High)</i>	Moderate adverse = Moderate adverse	Moderate adverse = Moderate adverse effect <i>(2020 Moderate adverse = Moderate adverse effect)</i>	Minor adverse = Slight adverse effect <i>(2020 Minor adverse = Slight adverse effect)</i>	Agree.
Setting – Higham Arable Farmland (Sub area Chalk)	High <i>(2020 High)</i>	Major adverse = Very Large adverse effect	Moderate adverse = Moderate adverse effect <i>(2020 Moderate Adverse = Moderate adverse effect)</i>	Minor adverse = Slight adverse effect <i>(2020 Minor adverse = Slight adverse effect)</i>	No comments.
Setting – Tilbury Marshes	Low <i>(2020 Low)</i>	Major adverse = Moderate adverse effect	Moderate adverse = Slight adverse effect	Moderate adverse = Slight Averse effect	No comments.
Setting – Chadwell Escarpment Urban Fringe	Medium <i>(2020 Medium)</i>	Moderate adverse = Moderate adverse effect	Minor adverse = Slight adverse effect	Minor adverse = Slight adverse effect	No comments.

