

Q12.2.5

The AONB Unit considers that a longer period of assessment and replacement is essential. This is particularly important given the potential impacts of climate change with associated periods of summer drought and excessive winter wet that have been experienced in the south east in recent years, which will impact on successful plant establishment, particularly in the early years after planting. Furthermore, plants which are planted (rather than established through natural regeneration) are more vulnerable to the effects of climate and less likely to withstand periods of drought, and this is particularly the case where planted as mitigation on engineered banks, cuttings etc. A longer period would also allow for mitigation and remedial action against the impacts of any plant borne disease, such as that experienced as a result of ash die back, which have also become more prevalent in recent years and are often experienced first in the UK in Kent, due to its proximity to the Continent. It is therefore considered that a minimum period of ten years would be more appropriate.

Q12.2.10

As the LVIA predicts significant residual impacts to the Kent Downs AONB, both to landscape and visual receptors, in the event it is determined that exceptional circumstances justify the Project and there are no alternatives, there is a need for further mitigation within the AONB to help reduce the predicated impacts.

The AONB Unit recognises that opportunities for mitigation of the AONB landscape at a landscape scale within AONB are limited, mainly due to the potential for mitigation alongside the A2/M2 being restricted as a result of the constraints associated with the proposal to locate the diverted utilities corridors adjacent to the A2/M2.

Two additional areas of land within the AONB that could be considered for mitigation planting are:

- i. Land to the immediate east of Harlex Haulage Services at Park Pale to the immediate north of the A2/A289, currently excluded from the Order limits (between the haulage firm site and the proposed attenuation pond).
- ii. Land to the south of the A2, at the eastern end of the Project between the exit slip road west bound at junction 1 of the M2 leading to the A289 east bound. While some of this land is currently wooded (including an area of Ancient Woodland), there appears to be opportunities for expanding the woodland on this land-locked island. Historic mapping indicates this land was previously wooded so woodland planting would seem appropriate.

However these are relatively small scale areas and in view of limited opportunities for landscape scale mitigation through planting within the AONB, it is considered mitigation should be focused on reducing the harm arising from the increased severance of the AONB landscape due to the widening of the highway corridor along the A2 and loss of vegetation from the central reservation and adjacent to the highway and HS1 mitigation planting to accommodate the utilities diversions. Green bridges provide the greatest opportunity to help mitigate the impacts of the severance of the landscape and to provide connectivity for habitats, landscape and recreation. While it is proposed to replace the Thong Lane South and Brewers Lane bridges with green bridges, the proposals for both bridges fall far short of the scale of response needed in view of the scale of environmental impact arising from the Project. Much broader bridges should be provided, allowing for wider tracts of vegetation on both sides of the bridge and on either side of the Walkers, Cyclists and Horse riders route to ensure that recreational users are less exposed to the views and noise of the widened A2 and to provide fully functioning ecological and landscape linkage as well as signalling an entrance gateway to the Kent Downs AONB.

The same benefits would arise from the replacement of the existing Park Pale bridge which provides further opportunity for reducing the severance of the landscape and would also provide and signal an entrance gateway at the eastern end of the AONB. It would also provide an improved experience for recreational users of the bridge that is crossed by public footpath NS161 and National Cycle Route 17 and only used by limited vehicular traffic.

Further opportunities for mitigation to the AONB include:

- Additional Design Principles to help ensure reduction of impacts on the AONB as set out in Section 8.4 of the AONB Unit's Written Representation.

- Further review and refinement of the proposed planting to ensure it is appropriate to the landscape character of the AONB. This should include increased woodland planting at various locations, such as in the semi-circle of land between the A2 and Park Pale overbridge slip road and between the A2 and High Speed 1 Rail Line, and a review of the woodland planting proposed between Brewers Wood and Great Crabble Wood to maintain a more 'parkland' character in keeping with existing landscape character.

Q12.3.1

The AONB Unit confirms that it is in general agreement with the LVIA methodology and that the locations of visual receptor viewpoints for the main Project were agreed with National Highways. The further 13 viewpoints added to assess the proposed Nitrogen Deposition compensation sites were not discussed or agreed with the AONB Unit, however we have no specific concerns in connection with these.

The AONB Unit considers that the provision of some additional photomontages would assist in better understanding the potential visual impacts of The Project. In particular, we consider a photomontage of the proposed multi-level junction of the A2 and A122 when viewed from the AONB would be helpful. The AONB Unit has consistently requested illustrative material that would enable increased understanding of the impacts of this junction which has been lacking to date in the consultation documents, including in our responses to the Community Impacts consultation, September 2021 and Supplementary Consultation dated March 2020. In response to these requests, draft cross sections were supplied to the AONB Unit on 10th May 2023, however it is considered that a photomontage would further aid understanding of the visual impacts of the junction and the potential effectiveness of mitigation planting.