

Gravesham Borough Council

(IP ref: 20035747)

Deadline D8

Appendix 1b

8. To KCC, GBC, Thurrock Council, NE, Kent Downs AONB Landscape and Visual conclusions

Provide a summary of your respective positions on the Applicant's conclusions within Chapter 7, Landscape and Visual of the ES [APP-145] paragraph 7.9.22.

'7.9.22 As required by DMRB LA 107, the effect of the Project on both the landscape and visual amenity has been separately assessed and the outcome combined to a single conclusion of the likely significant effect on landscape and visual amenity. Although there would be some very large and large adverse effects arising from the Project, these would be localised due to extensive mitigation proposals which would help screen views of the new road and reinstate landscape features removed to facilitate construction. For the most part, effects of the Project would be moderate or below. It is therefore concluded that the Project would result in a combined moderate adverse significance of overall landscape and visual effect on the existing landscape and visual amenity, which is considered significant in the context of the EIA Regulations.'

The DMRB LA107 guidance referred to by the Applicant does not state that the separate assessments of landscape effects and visual assessment effects should be combined into a single conclusion. Nor does it give any guidance on whether the combined conclusion relates to the whole life of the project, or the residual impact. The combining of landscape and visual assessment into one conclusion is not one that is promoted by GLVIA 3 guidance. The combined assessment presented by the Applicant in para 7.9.22 appears to have to provenance in any guidance of which the Council is aware.

In the case of the LTC, the project is of such a large scale, and the effects so varied across a complex range of areas, sensitivities, and impacts, that drawing one conclusion is meaningless. More importantly, even if the combined exercise were to be undertaken, we consider the single conclusion is not representative of the impacts due to the project. Also, the inclusion of sensitive landscapes - notably the KDAONB - within the assessment requires different judgements regarding the landscape and visual baseline and the assessment of effects.

GLVIA 3 is clear about how a proposed development should be understood in terms of assessment (see GLVIA3 sections 4.2 and 4.3). The details of the LTC project will likely evolve over a number of years, and GLVIA 3 advises that the assessment of likely effects must be based on clearly defined parameters. With such a large-scale project, it is appropriate to consider a range of possibilities, including a reasonable scenario of maximum effects, or 'worst case' situation. Mitigation proposals will need to be adequate to cope with the likely effects of this worst case. Accordingly, the most adverse effects of the project should be afforded greater weight in the overall assessment. This being the case and given the number of large adverse and very large adverse effects for landscape and visual amenity that are concluded in the LVIA, it is our view that the 'combined moderate adverse significance of overall landscape and visual effect on the existing landscape and visual amenity' is an underestimate of the overall significance of effects of the project.

We have commented on the LVIA previously and have raised our concerns about the downgrading of the landscape and visual baseline and the under-assessment of landscape and visual impacts. This is in addition to our concerns regarding the reduction in the significance of effects in the 2022 assessment when compared with the 2020 assessment.

The Applicant's conclusions as set out in paragraph 7.9.22 of APP-145 (above) refer to large and very large adverse effects arising from the project, and their localised nature due to the screening effects of proposed mitigation. GLVIA3 is clear on the approach that should be taken in mitigating adverse effects. Section 4.26 Re Mitigation states: 'If potentially significant adverse effects cannot be prevented or avoided, the strategy should be to reduce those that remain as far as possible. In general, the emphasis should be on modifying scheme design through successive iterations to reduce adverse effects. Sympathetic treatment of external areas can, in some circumstances, help the integration of a new development into the surrounding landscape, but measures that are simply added on to a scheme as 'cosmetic' landscape works, such as screen planting designed to reduce the negative effects of an otherwise fixed scheme design, are the least desirable.'

We refer also to our response to Question 3a)i. at ISH 11, where we outlined the Council's position regarding the impacts of the project on the character and integrity of the KDAONB, and our view that the impacts would be far-reaching and long lasting.