

Date: 03 June 2019
Our ref: [REDACTED]
Your ref: Y19/0257/FH



[REDACTED]
Folkestone & Hythe District Council

BY EMAIL ONLY

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

Dear [REDACTED]

Planning consultation: Outline application, with all matters reserved, for a comprehensive residential led mixed use development

Location: Land bounded by the M20 and Channel Tunnel Railway Link (CTRL) to the north; the A20 / Stone Street and Sandling Park to the east; Harringe Lane to the west; and Aldington Road to the south

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Thank you for your consultation on the above dated 19 March 2019 which was received by Natural England on the same date. It was useful to meet with you on 01 May 2019 to have a preliminary discussion on the landscape and visual impacts of the proposed scheme.

This letter is Natural England's initial response to the above proposed scheme in relation to the Landscape and Visual Impact Assessment (LVIA), and impacts on the Kent Downs Area of Outstanding Natural Beauty (AONB). As agreed with your authority, our detailed comments on the rest of the application will be provided in due course.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON PROTECTED LANDSCAPE

As submitted, the proposed development for 8,500 homes will have a significant adverse and likely permanent effect on the setting of the AONB and on views from the AONB scarp, which cannot be fully mitigated as presently put forward.

Having reviewed the outline application and accompanying LVIA, Natural England is very concerned that significant tracts of the development will remain highly visible from the AONB scarp during the long construction phase and operation.

This is due to the quantum, density and height of the development as currently proposed, situated on an ascending slope facing towards the AONB, which we consider does not allow for enough structural planting mitigation to sufficiently blend the scheme into the wider landscape.

We also advise the LVIA has not been undertaken adequately, in terms of best practice methodology, and especially in its severe underestimation of the significance of the impacts on the AONB.

We therefore strongly advise the housing level, density and height is significantly reduced, for instance to the housing level indicated in the strategic allocation in the emerging Core Strategy Review¹. This may offer more opportunity for interspersed planting which can provide screening more easily, considering the time taken for trees to grow and mature, and enable a significant impact on the AONB to be avoided.

Whilst Natural England does not object in principle to development of this site, it is critical that any proposed scheme is truly sustainable, and indeed a garden town should be an exemplar of sustainable development. Central to this is its interaction with the AONB ensuring no lasting harm to the protected landscape, and contributing to its enhancement. This is also required by both local and national planning policy.

Natural England therefore urges further discussions should take place to reconsider the proposed scheme such that impacts on the AONB can be fully mitigated, and the scheme made truly sustainable.

Without the scheme being sufficiently amended to achieve this, Natural England may need to object to the current proposal.

Our detailed comments on the LVIA and visual amenity impacts on the AONB are provided in Annex One. Our comments on LVIA methodology and viewpoints analysis are provided in Annex Two.

In light of the above, we urge that further, detailed discussions are held to consider how the scheme can be delivered without causing a significant impact on the AONB. Should the developer wish to explore options for avoiding or mitigating the effects described above with Natural England, we advise they seek advice through our [Discretionary Advice Service](#).

If this is possible, Natural England may be able to move to a position of being able to support this development.

Our detailed comments on the rest of the application, including the Habitats Regulations Assessment (HRA), will be provided in due course.

Should the proposal change, please consult us again.

If you have any queries relating to the advice in this letter please contact me on [REDACTED]

Yours sincerely

[REDACTED]
Senior Advisor
Sustainable Development network, Sussex and Kent team

¹ 6,375 homes proposed for the garden settlement allocation, which will make up the majority of the Council's housing need for the Local Plan period to 2036/37. *Folkestone and Hythe District Council Core Strategy Review submission* <https://www.folkestone-hythe.gov.uk/Core-strategy-review-2019>

ANNEX ONE

Detailed comments on Otterpool planning application – AONB impacts

Proposed site location in relation to the Kent Downs AONB

The site is located within the setting of the Kent Downs Area of Outstanding Natural Beauty (AONB), and is surrounded by the AONB to the north (North Downs escarpment and slopes), east and south. The site itself is situated on an ascending slope from its northern to southern boundaries (rising from approximately 55 AOD along the northern boundary up to approximately 105 AOD at the southern boundary between Lympne Industrial Estate and Lympne village). It is clearly visible along a substantial section of the North Downs escarpment, especially along the North Downs Way National Trail.

The views from the scarp in this area are typical of this iconic, nationally important landscape, offering extensive panoramas of semi-natural rural landscape to the south, including Dungeness, and Romney Marsh in the far distance. The near to middle-distance is dominated by a patchwork of agricultural fields interspersed with hedgerows, mature trees and woodlands. The setting also comprises existing settlements, including Sellindge, Brabourne, Lympne, and the town of Ashford to the west, which are which are well blended into the landscape

The views out from the AONB are a special quality which inform and contribute to why the area has been nationally designated, as are views from the setting to the scarp². The quality and importance of the AONB are not solely dependent on the land within its boundary, but also the setting in which it sits.

The government's Planning Practice Guidance (PPG) on the Natural Environment³ confirms this with regard to the statutory duty on public bodies to '*have regard*' to the statutory purposes of AONBs and National Parks. The duty requires that '*in exercising or performing any functions in relation to, or so as to affect, land*' in National Parks and Areas of Outstanding Natural Beauty, relevant authorities '*shall have regard*' to their purposes'. This duty applies to AONBs under s85 of the Countryside and Rights of Way Act 2000. The PPG states that: '*The duty is relevant in considering development proposals that are situated outside National Park or Area of Outstanding Natural Beauty boundaries, but which might have an impact on the setting of, and implementation of, the statutory purposes of these protected areas*'.

Natural England's previous advice on the proposed Otterpool Park scheme, in relation to the AONB

The Folkestone and Hythe DC Core Strategy Review submission includes the proposed garden settlement scheme as a strategic allocation, for approximately 6,300 homes, to make up the majority of the Council's housing shortfall for the Local Plan period to 2036/37.

In our response to the submission (dated 11 March 2019, ref 271589), we advised a high quality and detailed LVIA is needed to accompany any planning application for the Otterpool Park scheme, to ascertain the potential impacts on the AONB.

We also advised that a considerable package of mitigation measures, which are feasible and can be secured for the long term, should be identified to avoid a significant impact on the AONB. This

² Dramatic landform and views are recognised as one of the AONB's special characteristics "*The Kent Downs dramatic and diverse topography is based on the underlying geology. These features comprise: impressive south facing steep slopes (scarps) of chalk and grassland....*" (p 7 of the Kent Downs AONB 2014-2019 [Management Plan](#)).

The AONB Unit's [Position Statement on Setting](#) also identifies that "*the upland nature of the scarp makes it a prominent feature in the wider landscape, particularly in views towards the scarp from the south*".

³ <https://www.gov.uk/guidance/natural-environment>

should include advance structural planting and other green measures as part of an ambitious GI strategy, along with sensitive planning of location, density and height of buildings, and building design.

In the absence of measures to avoid a significant impact on the AONB, we do not consider the Core Strategy Review can be considered sound, in relation to impacts on the AONB.

Natural England has also provided some pre-application advice to the Masterplanning team on the Otterpool Park proposals, alongside the AONB Unit, on suitable viewpoints and methodology for the LVIA. However, we were disappointed not to be engaged on the emerging LVIA, despite us urging that several scenarios should be reviewed in relation to location, density and height of built development, to inform the LVIA and provide the best possible solutions to avoid impacts on the AONB.

LVIA – AONB and North Downs Way National Trail impacts (visual amenity)

Having reviewed the outline application including the LVIA, as submitted, and visited the proposed site and surrounding AONB to consider the key views affected⁴, we are disappointed and very concerned that the proposed scheme will have a significant and permanent adverse impact on the AONB.

In our view, the LVIA has not followed best practice methodology, and severely underestimates the impacts of the scheme on the AONB.

Our detailed comments on the LVIA methodology and viewpoints assessment are provided in Annex Two of this letter.

Viewpoints analysis summary

Natural England is particularly concerned that the visual impacts on several key viewpoints located within the AONB (particularly VPs 2-6 and 26-28) and on or within the boundaries of the proposed site (VPs 9, 14, 17, 18, 20, 22, 24) have not been assessed realistically in terms of impact on the AONB.

This is principally through the underestimation of their sensitivity (considering their high landscape value and high susceptibility) and magnitude of change. This consequently leads to underestimated residual significance of effects, especially up to and after year 15 of operation.

These viewpoints were considered by Natural England during a site visit and are discussed in detail in Annex Two.

Natural England recommends more realistic assessments should be made of overall significance of effects for these viewpoints, of **Major/ moderate to Major adverse, permanent and significant**, for peak construction and year 15 of operation, as follows:

- VP 2 (North Downs Way National Trail, near Brabourne) – **Major/ moderate adverse, permanent, and significant**, as opposed to ‘Moderate/ minor’ adverse non-significant (peak construction and year 15)
- VP 28 (North Downs Way National Trail, just north-east of Brabourne) – **Major/ moderate adverse, permanent, and significant**, as opposed to ‘Moderate/ minor’ adverse non-significant (peak construction and year 15)

⁴ Site visit by Natural England to proposed site and surrounding AONB, on Wednesday 24 April 2019, to consider key viewpoint locations including viewpoints 2, 4, 5, 8-10, 14, 18, 20, 22-24, 27 and 28. The weather was fair with good visibility.

- VP 4 (North Downs Way National Trail, Farthing Common car park) – **Major/ moderate adverse, permanent, and significant**, as opposed to ‘Moderate/ minor’ adverse non-significant (peak construction and year 15)
- VP 5 (North Downs Way National Trail, on a key promontory near Postling) – **Major adverse, permanent, and significant**, as opposed to ‘Moderate/ minor’ adverse non-significant (peak construction and year 15)
- VPs 3-6 and 26 (PRoWs along AONB scarp) – **Major/ moderate adverse, permanent, and significant**, as opposed to ‘Moderate/ minor’ adverse non-significant (peak construction and year 15)
- VPs 2 and 5 (open access land, AONB scarp and slopes) – **Major/ moderate adverse, permanent, and significant**, as opposed to ‘Moderate/ minor’ adverse non-significant (peak construction and year 15)
- VP 27 (AONB slopes near Stanford) – **Major/ moderate adverse, permanent, and significant**, as opposed to ‘Moderate/ minor’ adverse non-significant (peak construction and year 15)
- VPs 9, 14, 17, 18, 20, 22, 24 (within or just outside the proposed site) – these VPs are not considered by the LVIA terms of impacts of the development on the AONB. All these viewpoints experience views from the setting up to the AONB scarp to the north. Such views from the setting to the AONB form a special quality for which the AONB is designated. The proposed development will severely minimise or altogether remove these views to the scarp, and severely affect the enjoyment of the AONB from its setting. This impact will be **Major adverse, permanent, and significant**.

Generally, we consider the LVIA fails to properly acknowledge the fundamental changes the proposed scheme would have on the AONB, by significantly altering a large swathe of its setting from an area of open rural countryside with a patchwork of fields and hedgerows to that of an extensive and densely built scheme with buildings up to five storeys high.

Key areas of impact

Considerable areas of the development will be highly visible, likely permanently, from significant stretches of the AONB scarp, despite the proposed advanced structural planting. This is due to the sheer density and height of buildings situated on an ascending slope from north to south which faces towards the AONB scarp.

In particular, these include:

- much of the **eastern tract of development**, including the north-eastern employment/ business ‘triangle’, proposed town centre, and Otterpool slopes which extend south to Lymgne village and Link Park industrial estate. This whole area is expansive and prominent, and increasing in elevation from north to south (from approximately 70 AOD near the railway, to 105 AOD between the Link Park industrial estate and Lymgne village).

Development in the north-eastern triangle will likely include large warehouses/ buildings with large prominent roofspaces. The town centre and Otterpool slopes together form an almost continuous block of dense and high building mass, much of which is identified as medium high to high scale in the DAS (up to five storeys, 18m). There is relatively little proposed structural planting in this area to break up this built form, particularly in the way of east-west orientated tree belts. As currently planned, much of the development will be clearly visible from along a considerable stretch of the AONB scarp from Stowting to Etchinghill (viewpoints

4-6), from the North Downs Way National Trail, other public footpaths and open access, and especially apparent from VP 5. These extensive views will persist over a considerably long period of time as the development is built out, and may never be effectively mitigated.

- Development within the north-centre region of the proposed site (including the **current racecourse area** and the area west of it, up to the A20) will be occupied by dense, high buildings. This area sits on a slope which rises from approximately 55 AOD in the north up to around 75 AOD on the A20. The development particularly nearer to the road will not be sufficiently hidden by proposed planting along the northern boundary of the site. It will be especially visible along the stretch between Stowting and Farthing Common on the AONB scarp (as demonstrated by viewpoints 3-4), and from public footpaths at and near viewpoint 27 on the slopes near Hayton Manor Farm.
- development around **Barrow Hill**, although generally less dense/ high than the north-central area and proposed town centre, is extensive, and includes a central, prominent area of medium to high scale dense buildings (up to five storeys, 18m, as depicted on figure 138 of the DAS) on higher land at approximately 80 AOD. The area climbs steadily up to approximately 100 AOD along the B2067 on the southern boundary of the site.

There are some substantial belts of planting proposed around the northern and western extremities of the development around Barrow Hill, with some interspersed planting through parts of the development. However, given the increasing elevation of the site, it is unlikely this will be sufficient to break up views of the built area, particularly of the central part of the Barrow Hill area southwards to the B2067. This area of development will be especially visible from public footpaths, open public access and the North Downs Way National Trail along a significant stretch between Brabourne to Stowting and Farthing Common (viewpoints 2-4, 26 and 28).

The areas identified above will be especially visible for a considerable amount of time given that structural planting will take up to 20 years and more to reach mature heights, with the whole scheme to be built out over 30 years. The LVIA, under *Mitigation of Effects*, discusses the likely growth rates of advance planted transplant and feathered trees (para 12.4.17, sixth bullet point). According to this, it is likely structural planting will reach a height of approx 10m after 15-20 years, and approximately 20m after 40 years or more. This leaves decades where much of the medium to high scale development will be plainly visible from the AONB, and may not ever be sufficiently screened.

LVIA conclusions – residual and cumulative effects

Despite the above, we are very concerned the LVIA concludes no overall significant impact in terms of visual amenity on the AONB as a result of the scheme, during construction and operation (as summarised in paragraph 12.5.50). Natural England does not agree with this conclusion.

It states that effects are '*not significant*' on the key AONB special quality *Dramatic Landform and Views* (para 12.5.51). It also states that the '*proposed development would not hinder views to Romney Marsh and Hythe Bay from the greensand ridge and Hythe escarpment*' (para 12.5.52). For the latter, we consider the development will in fact be a serious detractor particularly from the special long-distance view out to Romney Marsh.

The LVIA also states the effect on users of public rights of way to the north of the scheme is considered '*not significant*' (para 12.5.32). It does not refer to the extensive open access on much of the scarp ridge and slopes which will also be affected.

With regard to the North Downs Way National Trail, the LVIA pays little attention to the key stretch of the Trail which will be most affected by the proposed development, particularly from Brabourne (VPs 2, 28, approximately 4.5km north of the proposed site), through to Farthing Common (VP 4,

approx 3.2km north of the proposed site), Postling (VP 5, 2.5km north of the proposed site) and Etchingill (VP 6, approx 2.8km north of the proposed site).

This stretch is over 7km long, much of which will have views of the proposed development despite proposed mitigation planting, which will clearly detract from the rest of the countryside. This is particularly so given the site is situated on an ascending slope from its northern to southern boundary, thus presenting more of the development as part of the view, revealing dense and high buildings.

In enclosed views along the North Downs Way, when framed within combes or between treelines, the development will become all the more obvious (eg at VP 28). Also, loss of mature ash trees due to ash dieback, which is the most dominant tree on the Downs, may further open up views in the short to medium term (eg at VP 4, Farthing Common).

Yet the LVIA concludes effects on the North Downs Way to be '*not significant*' (para 12.5.41). We consider the development will in fact become a dominant feature affecting this National Trail.

In its justification in the Viewpoints Analysis Table (appendix 12.2), the LVIA consistently refers to AONB users being accustomed to built development in the setting, and repeats this in the main report (para 12.5.37). However, existing settlements in the setting, including the villages of Sellindge, Brabourne, Lympne and the town of Ashford, are in fact well blended into the landscape. They have evolved over a protracted period of time, with less dense and less high buildings (generally 2-3 storeys), often sunken in the lie of the land, and masked well by interspersed mature trees, treelines and woods. In contrast, the Otterpool Park scheme for 8,500 homes presents an entirely new town to be built in a short timeframe and in a relatively small area.

The LVIA also consistently makes reference to '*extensive lighting of the M20*' in its justification for attributing lesser magnitude of change for key viewpoints. However, this is a predominantly night-time issue and should not form part of the baseline upon which impacts on the AONB are assessed, given that users of the AONB would be affected mainly during the day.

Cumulative effects

We have some overarching concerns regarding the assessment of cumulative effects, including the baseline scope used, and the assessment itself, which is not clear in the LVIA main report. This is discussed below.

The Council's Places and Policies Local Plan⁵, currently at Examination, includes the site allocation *Policy ND6 Former Lympne Airfield*, for 125 homes (on site 1, adjacent to the western boundary of Lympne) and retained greenspace (site 2). We note this has not been included in the assessment of cumulative effects because '*the proposed development would displace this current permission*' (para 12.3.331, LVIA).

Similarly, we note this is the case for the outstanding permission Y15/0880/SH and site allocation for an extension to the Lympne Industrial Estate, and the current permission for an anaerobic digestion facility at Otterpool Quarry.

We strongly urge confirmation is provided by Folkestone and Hythe District Council that these allocations and permissions would indeed be displaced by the proposed garden town development, so that we can be satisfied they can be excluded from the cumulative impacts assessment.

We also note the cumulative impacts section does not include the strategic allocation to expand Sellindge by 350 homes (policy CSD9 in the emerging Core Strategy Review), in contrast to the

⁵ https://www.folkestone-hythe.gov.uk/media/4793/Places-and-Policies-Local-Plan-Submission-Draft---February-2018/pdf/Places_and_Policies_Local_Plan_Submission_Draft.pdf

Otterpool Park Framework Masterplan Area (OFMA), for 1,500 homes outside the redline boundary of this proposed application, which is included.

Given the CSR is now at submission stage and due for Examination, we strongly recommend it is prudent for the Sellindge allocation to also be considered cumulatively with the garden town development.

The permanent solution to Operation Stack (the Lorry Holding Area) is also not included in the scope (despite being discussed in the Transport chapter of the application, paras 16.5.43 to 16.5.52). Whilst we note details of the new temporary mitigation scheme are not currently available, should they become so (possibly in 2019) we strongly recommend these are assessed cumulatively with the garden scheme development in terms of impacts on the AONB, which could potentially be severe.

In terms of the assessment itself, it is unclear how other extant and committed developments have been considered cumulatively with the proposed development, with little or no reference made to other schemes in Section 12.5 *Assessment of Residual and Cumulative Effects* (particularly the Visual Amenity Impact Assessment and Landscape Related Designations, pages S12-72 to S12-74).

Summary of the impacts of the proposed development on the AONB

In light of the above, we advise the LVIA is inadequate and severely underestimates the significance of residual and cumulative effects especially on the AONB and North Downs Way National Trail.

As currently proposed, the quantum of 8,500 homes, and the density and height of proposed housing and development for the Otterpool Park scheme, far exceeds the carrying capacity of the site to absorb the harmful impacts on the AONB. The scheme will have a major significant adverse and likely permanent effect on the setting of the AONB and on views from the AONB scarp, which cannot be fully mitigated.

This is especially so along much of the North Downs Way National Trail, particularly between Brabourne and Etchinghill, including the extensive network of public footpaths and open access land along the scarp ridge and slopes.

The scale of the development is such that we do not consider structural planting can adequately break up views of the development from the AONB scarp, even when mature. This is made more difficult that the development is situated on an ascending slope which faces the AONB.

Ultimately, the proposed scheme presents a new, significant and dramatic insertion of built environment in the near-setting of the AONB, over a relatively short timeframe compared to other large settlements. It will include blocks of continuous built form as described above, lighting and movement, the latter particularly during construction which will last for three decades as the town is built out.

The garden town will essentially transform the views and experience from the scarp from an expansive and attractive landscape of dominant semi-natural, rural and undulating character, to that which is urbanised.

In so doing, **the scheme will impact on people's current experience and enjoyment of this iconic nationally important landscape and its panoramic setting**, and detract from the important relationship between the Downs and the wider countryside, including to the coast, Romney Marsh and Dungeness, which makes this such a special and unique part of the AONB and the nation.

Finding a solution

It is important for us to stress that Natural England does not object in principle to development of this site. But it is critical any proposed scheme is truly sustainable, and indeed a garden town should be an exemplar of sustainable development, as set out in the Council's Charter for Otterpool Park⁶. Central to this should be its interaction with the AONB, ensuring no lasting harm to it, and contributing to its enhancement.

This is required by the Council's emerging Local Plan policies and national planning policy:

- *National Planning Policy Framework (NPPF)*
In paragraph 170 the NPPF states '*planning policies and decisions should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes..*' Paragraph 172 gives more detail on this, stating '*great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to these issues*'.
- Policy *SS1 District Spatial Strategy* of the adopted Core Strategy 2013 states:
'The future spatial priority for new development in the North Downs area is on accommodating development outside of the AONB and without material impact on its setting; consolidating Hawkinge's growth; and sensitively meeting the needs of communities within the AONB at better-served settlements.'
- Policy *CSD4 (Green Infrastructure of Natural Networks, Open Spaces and Recreation)* of the emerging Core Strategy Review (CSR) states:
'e. Planning decisions will have close regard to the need for conservation and enhancement of natural beauty in the Kent Downs Area of Outstanding Natural Beauty (AONB) and its setting, which will take priority over other planning considerations. Elsewhere development must not jeopardise the protection and enhancement of the district's distinctive and diverse local landscapes (especially where these support the setting of the AONB), and must reflect the need for attractive and high-quality open spaces throughout the district.'

The garden town application is for 8,500 homes, however the emerging Core Strategy Review has strategically allocated the proposed site to accommodate approximately 6,375 houses for the Local Plan period to 2036/37.

Housing at the lower allocated level may be much more feasible in being able to incorporate sufficient mitigation so that the development does not impact significantly on the AONB. This housing quantum would allow for lower density and height of buildings, and more interspersed planting to break up views from the AONB scarp, particularly through use of east-west orientated banks of mature trees and hedgelines. Such planting would also have to work 'less hard' to mitigate for less high buildings, when considering the time taken for trees to grow and mature.

We therefore strongly advise the housing level, density and height is significantly reduced, with increased structural planting, to break up the development such that the built form blends with the wider landscape.

This would also enhance the fundamental principle of sustainability by providing a better green and blue infrastructure network, providing habitat for wildlife, enjoyment for the local community and provision of a range of ecosystem services.

⁶ https://www.folkestone-hythe.gov.uk/media/4549/A-Charter-for-Otterpool-Park---Consultation-Draft/pdf/A_charter_for_Otterpool_Park_Draft.pdf

Outline application status and need for development briefs

We also consider it is too simplistic to submit an application for a development of this scale as outline. The outline status means there is not enough detail provided on proposed mitigation, and therefore little reassurance that the mitigation is sufficient, feasible, or able to be secured in the long term.

Natural England strongly recommends that development briefs are provided, geographically, to provide a strategic focus on proposed mitigation which addresses specific proposed development parameters and the circumstances of those areas. The briefs should include details on likely impacts on views from the AONB, and the variety of measures used to address these including structural planting, use of other green and blue infrastructure, and building dimensions, design, materials and colour⁷.

Crucially, the application should also address how this mitigation will be secured in perpetuity, including the management of the green and blue infrastructure estate as a whole.

The above information is essential to ensure the AONB will be properly protected, and to avoid the risk of mitigation and design principles otherwise being lost or diminished through the process as the scheme is subsequently delivered in parcels by various developers.

⁷ Refer to Waygood Colour <http://www.waygoodcolour.co.uk/>

ANNEX TWO

Detailed comments on Otterpool planning application – LVIA, phasing of development and proposed structural planting mitigation

LANDSCAPE AND VISUAL IMPACT ASSESSMENT

Having reviewed the LVIA, we consider the methodology and assessment have not been undertaken in accordance with best practice, and should be improved to provide a robust and realistic assessment, as set out below.

LVIA methodology and assessment

Whilst we were disappointed not to engage with the site promoters pre-application on the detail of the LVIA, we did engage on viewpoint selection, along with the Kent Downs AONB unit. We note the key viewpoints we considered should be assessed have been included in the LVIA. We also note additional viewpoints have been included to ensure the LVIA is as robust as possible, including VPs 26, 27 and 28.

However, our key concerns regarding the assessment of viewpoints are as follows:

- *Viewpoints assessed in groups* – we note with concern in the LVIA that the viewpoints have tended to be assessed as groups rather than individually. This makes it difficult to ascertain the impacts on each viewpoint on its own merits, and risks diluting the LVIA findings, particularly for views looking out from the AONB. Viewpoints should be assessed individually and not merged together, to avoid disguising or ‘averaging out’ significance of effects.
- *Photomontages*
 - ‘visualisations’ have only been prepared for a select number of viewpoints (for VPs 2, 3, 4, 5 and 6). We recommend additional photomontages should be undertaken especially for viewpoints 27 and 28
 - photomontages that have been produced do not clearly illustrate the potential height of development, and the colour used to indicate the extent of the development is selected as a dull brown which blends with the colours of the landscape. This is potentially misleading as the built development will likely be more obvious including brighter colours from instance from window frames, and commercial building roofs
 - photomontages should include clear identification of key locations to aid the viewer in deciphering parts of the development and structural planting across the site. For instance, this should include the extent of development, Lympne, Link Park business area, the Otterpool Quarry SSSI, the existing racecourse and Barrow Hill
- *Scenarios* – we note the three scenarios used in the assessment comprising: peak construction year; year 0 following completion and year 15 following completion. There should also be a scenario depicting 20 and 30 years after construction, in line with the proposed timeline for build out of the whole development.

Clarification should also be provided on the indicative phasing as depicted in the Development Timeline in the Design and Access Statement (DAS) (figures 59-62). Currently these do not appear to show the proposed housing adjacent to Link Park, or part of the business area in the north-eastern triangle of the site, despite these areas being shown as developed in the illustrative Masterplan for 8,500 homes. It is also not clear if these areas have been included in the photomontages.

Natural England's detailed comments on key viewpoints in the LVIA (as set out in Appendix 12.2, *Visual Amenity Impact Assessment* table), located within and on the boundary of the AONB, are provided in the table below. These comments are supported by a site visit made on Wednesday 24 April 2019, a day of fair weather with good visibility.

Viewpoint	Natural England comments
Within or on AONB boundary, north of proposed Otterpool Park site	
2 (as considered in the LVIA for users of the North Downs Way National Trail)	<p>This viewpoint, near Brabourne, is located approximately 4.6km north of the proposed site. It offers an extensive east-west panorama looking directly over the proposed site.</p> <p>The current view is dominated by far by a mosaic of fields, hedgerows and woodland. The development will present a strong linear urbanised feature from east to west, with tall and dense buildings visible especially to the east.</p> <p>Natural England advises overall residual significance of effect for this viewpoint should be upgraded from Moderate/minor to Moderate for construction and operation to Major/ Moderate adverse', permanent, and considered significant. This is deduced as follows:</p> <p><u>Visual Sensitivity</u> We agree with the attributed High value and High susceptibility, and overall High sensitivity.</p> <p><u>Magnitude of change</u> The LVIA concludes Small at peak construction (AS1), Moderate at Year 0 (AS2) and Small at year 15 (AS3), all adverse.</p> <p>We think this is seriously undervalued for VP2. Natural England advises magnitude of change should be upgraded to 'Large'.</p> <p>The LVIA justification states:</p> <p><i>'..the sight of any new built form and infrastructure would not be wholly unusual to users... given the land uses that are currently visually apparent, including different sized settlements (ie Ashford, Brabourne Lees, Brabourne, Aldington, Sellindge, Lympne, Stanford, Stowting and Postling), infrastructure and lighting of the M20, the elevated highways around Junction 11, the motorway service station, the motorway ,maintenance depot, the electricity convertor station, the high voltage overhead powerlines, the Lympne Industrial Estate, Dungeness power station, Little Cheyne Windfarm, the HS1 and Ashford-to-Folkestone railway and Westernhanger station.'</i></p> <p>We consider this statement to be misleading. The settlements referred to are on the whole small and old settlements, different in character, density and prominence as viewed from the AONB. Ashford is not contained in the view from VP2, and even when viewed from further along the AONB to the west, Ashford is generally of low density buildings and well hidden by mature trees and treelines. Other infrastructure such as the railway and motorway are not visible in this view, although Lympne Industrial Estate can be seen. The Dungeness power station and windfarm are so distant that they do not at all form a prominent focus in the view, and to be seen they must be searched for on a clear day.</p> <p>Otterpool Park however will present a completely new large scale town, of dense and high built form, in the AONB setting which is currently known for its rural semi-natural character. It will be clearly visible from this location and form a large and prominent feature across most of</p>

	<p>this view.</p> <p>The LVIA also states the creation of a town centre closest to the northern edge would ‘<i>help convey the visual legibility of the new settlement as a town, and not ‘sprawl’..</i>’. However we consider the town will be viewed as a whole built mass, with little distinction between the town centre and rest of the development.</p> <p>Further, whilst the magnitude of change may be relatively small during construction as it will be carried out in phases, the LVIA argues that by time of completion the ‘development would be distinct’ and not become the defining element in the visual experience. We consider this statement ignores the stark change that will occur when comparing the completed development to the baseline, which fundamentally changes the landscape character and views present at this location.</p> <p><u>Cumulative effects</u> There is no obvious separation between the development and Sellindge, which cumulatively provide a sense of considerably larger area having been developed, as seen from the scarp.</p> <p><u>Residual visual significance of effect</u> The LVIA considers significance of visual effect on this VP to be Moderate/ minor at peak construction (AS1), Moderate at Year 0 (AS2) and Moderate/minor at year 15 (AS3), all adverse, but ‘not significant’.</p> <p>We strongly disagree with this conclusion, for the reasons given above. Based on High sensitivity and Large magnitude of change, significance of effect should be upgraded to ‘Major/ moderate adverse’, permanent, and considered significant.</p>
<p>28 (as considered in the LVIA for users of the North Downs Way National Trail)</p>	<p>Enclosed view within a combe, just north-east of Brabourne and approximately 4.6km north of the development, frames the development and draws the eye towards it. This view is typical along much of the North Downs Way National Trail in the vicinity of this VP.</p> <p>Natural England advises overall residual significance of effect for this viewpoint should be upgraded from Moderate/minor to Moderate for construction and operation to ‘Major/ Moderate adverse’, permanent, and considered significant. This is deduced as follows:</p> <p><u>Visual Sensitivity</u> We agree with the attributed High value and High susceptibility, and overall High sensitivity.</p> <p><u>Magnitude of change</u> The LVIA concludes Small at peak construction (AS1), Moderate at Year 0 (AS2) and Small at year 15 (AS3), all adverse.</p> <p>We think this is seriously undervalued for VP2. Natural England advises magnitude of change should be upgraded to ‘Large’.</p> <p>The LVIA justification states:</p> <p><i>‘..the sight of any new built form and infrastructure would not be wholly unusual to users... given the land uses that are currently visually apparent, including different sized settlements (ie Ashford, Brabourne Lees, Brabourne, Aldington, Sellindge, Lympne, Stanford, Stowting and Postling), infrastructure and lighting of the M20, the elevated highways around Junction 11, the motorway service station, the</i></p>

	<p><i>motorway ,maintenance depot, the electricity convertor station, the high voltage overhead powerlines, the Lymgne Industrial Estate, Dungeness power station, Little Cheyne Windfarm, the HS1 and Ashford-to-Folkestone railway and Westernhanger station.'</i></p> <p>We consider this statement to be misleading. The settlements referred to are on the whole small and old settlements, different in character, density and prominence as viewed from the AONB. Ashford is not contained in the view from VP28, and even when viewed from further along the AONB to the west, Ashford is generally of low density buildings and well hidden by mature trees and treelines. Other infrastructure such as the railway and motorway are not visible in this view, although Lymgne Industrial Estate can be seen. The Dungeness power station and windfarm are so distant that they do not at all form a prominent focus in the view, and to be seen they must be searched for on a clear day.</p> <p>Otterpool Park however will present a completely new large scale town, of dense and high built form, in the AONB setting which is currently known for its rural semi-natural character. It will be clearly visible from this location and form a large and prominent feature across most of this view.</p> <p>The LVIA also states the creation of a town centre closest to the northern edge would '<i>help convey the visual legibility of the new settlement as a town, and not 'sprawl'..</i>'. However we consider the town will be viewed as a whole built mass, with little distinction between the town centre and rest of the development.</p> <p>Further, whilst the magnitude of change may be relatively small during construction as it will be carried out in phases, the LVIA argues that by time of completion the 'development would be distinct' and not become the defining element in the visual experience. We consider this statement ignores the stark change that will occur when comparing the completed development to the baseline, which fundamentally changes the landscape character and views present at this location.</p> <p><u>Cumulative effects</u> There is no obvious separation between the development and Sellindge, which cumulatively provide a sense of considerably larger area having been developed, as seen from the scarp.</p> <p><u>Residual visual significance of effect</u> The LVIA considers significance of visual effect on this VP to be Moderate/ minor at peak construction (AS1), Moderate at Year 0 (AS2) and Moderate/minor at year 15 (AS3), all adverse, but 'not significant'.</p> <p>We strongly disagree with this conclusion, for the reasons given above. Based on High sensitivity and Large magnitude of change, residual significance of effect should be upgraded to 'Major/ moderate adverse' permanent and significant.</p>
4 (as considered in the LVIA for users of the North Downs Way National Trail)	<p>This viewpoint, from Farthing Common car park, is located approximately 3.2km north of the proposed site. It offers an extensive east-west panorama overlooking the whole extent of the development, which is partially blocked by a belt of trees in the foreground.</p> <p>However, much of the eastern tract of the development up to Lymgne Village will be visible, as well as much of the western tract of the development around Barrow Hill. More of the central part of the proposed town will likely become visible over the next few years as the dominant tree Ash dies from Ash dieback, opening up the view.</p>

Where the view currently overlooks the proposed scheme, it is dominated by a mosaic of fields, hedgerows and woodland. The development will present a strong linear urbanised feature from east to west, with tall and dense buildings visible especially to the east.

Natural England advises overall residual significance of effect for this viewpoint should be upgraded from Moderate/minor to Moderate for construction and operation to **Major/ Moderate adverse**, permanent, and considered significant. This is deduced as follows:

Visual Sensitivity

We agree with the attributed High value and High susceptibility, and overall High sensitivity.

Magnitude of change

The LVIA concludes Small at peak construction (AS1), Moderate at Year 0 (AS2) and Small at year 15 (AS3), all adverse.

We think this is seriously undervalued for VP4. Natural England advises magnitude of change should be upgraded to **Large**.

The LVIA justification states:

'...the sight of any new built form and infrastructure would not be wholly unusual to users... given the land uses that are currently visually apparent, including different sized settlements (ie Ashford, Brabourne Lees, Brabourne, Aldington, Sellindge, Lympne, Stanford, Stowting and Postling), infrastructure and lighting of the M20, the elevated highways around Junction 11, the motorway service station, the motorway ,maintenance depot, the electricity convertor station, the high voltage overhead powerlines, the Lympne Industrial Estate, Dungeness power station, Little Cheyne Windfarm, the HS1 and Ashford-to-Folkestone railway and Westernhanger station.'

We consider this statement to be misleading. The settlements referred to are on the whole small and old settlements, different in character, density and prominence as viewed from the AONB. Ashford is not contained in the view from VP4, and even when viewed from further along the AONB to the west, Ashford is generally of low density buildings and well hidden by mature trees and treelines. Other infrastructure such as the railway and motorway are not visible in this view, although Lympne Industrial Estate can be seen. The Dungeness power station and windfarm are so distant that they do not at all form a prominent focus in the view, and to be seen they must be searched for on a clear day.

Otterpool Park however will present a completely new large scale town, of dense and high built form, in the AONB setting which is currently known for its rural semi-natural character. It will be clearly visible from this location and form a large and prominent feature across most of this view.

The LVIA also states the creation of a town centre closest to the northern edge would *'help convey the visual legibility of the new settlement as a town, and not 'sprawl'..'*. However we consider the town will be viewed as a whole built mass, with little distinction between the town centre and rest of the development.

Further, whilst the magnitude of change may be relatively small during construction as it will be carried out in phases, the LVIA argues that by time of completion the 'development would be distinct' and not become the defining element in the visual experience. We consider this statement ignores the stark change that will occur when comparing the completed development to the baseline, which fundamentally changes the landscape character and views present at this location.

	<p><u>Cumulative effects</u> There is no obvious separation between the development and Sellindge, which cumulatively provide a sense of considerably larger area having been developed, as seen from the scarp.</p> <p><u>Residual visual significance of effect</u> The LVIA considers significance of visual effect on this VP to be Moderate/ minor at peak construction (AS1), Moderate at Year 0 (AS2) and Moderate/minor at year 15 (AS3), all adverse, but 'not significant'.</p> <p>We strongly disagree with this conclusion, for the reasons given above. Based on High sensitivity and Large magnitude of change, significance of effect should be upgraded to 'Major/ moderate adverse', permanent and significant.</p>
<p>5 (as considered in the LVIA for users of the North Downs Way National Trail)</p>	<p>This viewpoint is perhaps the most affected by the proposed scheme, from the AONB scarp. It is located on a key promontory, near Postling, approximately 2.5km north of the proposed site. As for the previous VPs, it offers an extensive and clear east-west panorama, looking directly over the proposed site, which currently takes in the rural hinterland of the scarp, including the coastline down to Dungeness where the power station can be clearly seen.</p> <p>Ashford and Folkestone are not included in this view. The proposed commercial part of the development in the north-eastern corner of the site will be clearly visible from this location, with high density, large and high buildings with expansive roofs.</p> <p>The current racecourse site is also very visible from this location, meaning the dense and high built form in this area will also be clearly visible.</p> <p>Natural England advises overall residual significance of effect for this viewpoint should be upgraded from Moderate/minor to Moderate for construction and operation to Major/ Moderate adverse', permanent, and considered significant. This is deduced as follows:</p> <p><u>Visual Sensitivity</u> We agree with the attributed High value and High susceptibility, and overall High sensitivity.</p> <p><u>Magnitude of change</u> The LVIA concludes Small at peak construction (AS1), Moderate at Year 0 (AS2) and Small at year 15 (AS3), all adverse.</p> <p>We think this is seriously undervalued for VP5. Natural England advises magnitude of change should be upgraded to 'Very Large'.</p> <p>The LVIA justification states:</p> <p><i>'...the sight of any new built form and infrastructure would not be wholly unusual to users... given the land uses that are currently visually apparent, including different sized settlements (ie Ashford, Brabourne Lees, Brabourne, Aldington, Sellindge, Lympne, Stanford, Stowting and Postling), infrastructure and lighting of the M20, the elevated highways around Junction 11, the motorway service station, the motorway ,maintenance depot, the electricity convertor station, the high voltage overhead powerlines, the Lympne Industrial Estate, Dungeness power station, Little Cheyne Windfarm, the HS1 and Ashford-to-Folkestone railway and Westernhanger station.'</i></p>

	<p>We consider this statement to be misleading. The settlements referred to are on the whole small and old settlements, different in character, density and prominence as viewed from the AONB. Ashford is not contained in the view from VP5, and even when viewed from further along the AONB to the west, Ashford is generally of low density buildings and well hidden by mature trees and treelines. Other infrastructure such as the railway and motorway are not visible in this view, although Lympne Industrial Estate can be seen. The Dungeness power station and windfarm are so distant that they do not at all form a prominent focus in the view, and to be seen they must be searched for on a clear day.</p> <p>Otterpool Park however will present a completely new large scale town, of dense and high built form, in the AONB setting which is currently known for its rural semi-natural character. It will be clearly visible from this location and form a large and prominent feature across most of this view.</p> <p>The LVIA also states the creation of a town centre closest to the northern edge would '<i>help convey the visual legibility of the new settlement as a town, and not 'sprawl'..</i>'. However we consider the town will be viewed as a whole built mass, with little distinction between the town centre and rest of the development.</p> <p>Further, whilst the magnitude of change may be relatively small during construction as it will be carried out in phases, the LVIA argues that by time of completion the 'development would be distinct' and not become the defining element in the visual experience. We consider this statement ignores the stark change that will occur when comparing the completed development to the baseline, which fundamentally changes the landscape character and views present at this location.</p> <p><u>Cumulative effects</u> There is no obvious separation between the development and Sellindge, which cumulatively provide a sense of considerably larger area having been developed, as seen from the scarp.</p> <p><u>Residual visual significance of effect</u> The LVIA considers significance of visual effect on this VP to be Moderate/ minor at peak construction (AS1), Moderate at Year 0 (AS2) and Moderate/minor at year 15 (AS3), all adverse, but 'not significant'.</p> <p>We strongly disagree with this conclusion, for the reasons given above. Based on High sensitivity and Very Large magnitude of change, significance of effect should be upgraded to 'Major adverse' permanent, and significant.</p>
<p>VPs 3-6 and 26 (as considered in LVIA for users of intermediate/ medium range PRoWs between 2-5km north of site)</p>	<p><u>Visual Sensitivity</u> In the LVIA, these VPs are considered to be of Moderate visual value for minor PRoWs, despite being within the AONB, on the scarp with long distance views overlooking the proposed development. We advise this is upgraded to 'High'.</p> <p>We agree with the attributed High susceptibility for these VPs given they provide for people engaged in outdoor recreation.</p> <p>The LVIA attributes moderate sensitivity to these VPs, justifying this because the routes along which these VPs are located are '<i>not promoted routes, and considered as only local value</i>'. We disagree with this given the locations are within the AONB and therefore of inherent national landscape importance.</p>

We advise sensitivity should be upgraded to High.

Magnitude of change

The LVIA concludes Small at peak construction (AS1), Moderate at Year 0 (AS2) and Small at year 15 (AS3), all adverse.

We think this is seriously undervalued for these viewpoints and **advise magnitude of change for these VPs should be upgraded to Large.**

The justification states:

'..the sight of any new built form and infrastructure would not be wholly unusual to users... given the land uses that are currently visually apparent, including different sized settlements (ie Ashford, Brabourne Lees, Brabourne, Aldington, Sellindge, Lypne, Stanford, Stowting and Postling), infrastructure and lighting of the M20, the elevated highways around Junction 11, the motorway service station, the motorway ,maintenance depot, the electricity convertor station, the high voltage overhead powerlines, the Lypne Industrial Estate, Dungeness power station, Little Cheyne Windfarm, the HS1 and Ashford-to-Folkestone railway and Westernhanger station.'

We consider this statement to be misleading. The settlements referred to are on the whole small and old settlements, different in character, density and prominence as viewed from the AONB. Ashford is not contained in the view from VP5, and even when viewed from further along the AONB to the west, Ashford is generally of low density buildings and well hidden by mature trees and treelines. Other infrastructure such as the railway and motorway are not visible in this view, although Lypne Industrial Estate can be seen. The Dungeness power station and windfarm are so distant that they do not at all form a prominent focus in the view, and to be seen they must be searched for on a clear day.

Otterpool Park however will present a completely new large scale town, of dense and high built form, in the AONB setting which is currently known for its rural semi-natural character. It will be clearly visible from this location and form a large and prominent feature across most of this view.

The LVIA also states the creation of a town centre closest to the northern edge would *'help convey the visual legibility of the new settlement as a town, and not 'sprawl'..'*. However we consider the town will be viewed as a whole built mass, with little distinction between the town centre and rest of the development.

Further, whilst the magnitude of change may be relatively small during construction as it will be carried out in phases, the LVIA argues that by time of completion the *'development would be distinct'* and not become the defining element in the visual experience. We consider this statement ignores the stark change that will occur when comparing the completed development to the baseline, which fundamentally changes the landscape character and views present at this location.

Cumulative effects

There is no obvious separation between the development and Sellindge, which cumulatively provide a sense of considerably larger area having been developed, as seen from the scarp.

	<p><u>Residual visual significance of effect</u> The LVIA considers significance of visual effect on these VPs to be moderate/ minor at peak construction (AS1), moderate at Year 0 (AS2) and moderate/minor at year 15 (AS3), all adverse, but 'not significant'.</p> <p>We strongly disagree with this conclusion. As we have advised sensitivity and magnitude of change should be upgraded to high and large, respectively, so we advise residual significance of effect should be upgraded to <u>Major/ Moderate adverse</u> permanent and significant.</p>
<p>VPs 2 and 5 (as considered in the LVIA for users of the Open Access Land upon the North Downs scarp slopes within intermediate/ medium range 2-5km from site)</p>	<p><u>Visual sensitivity</u> In the LVIA, VPs 2 and 5 are considered to be of Moderate visual value for open access land, despite being within the AONB, on the scarp and its slopes with long distance views overlooking the proposed development. We advise this is upgraded to <u>High</u>.</p> <p>We agree with the attributed High susceptibility for these VPs given they provide for people engaged in outdoor recreation.</p> <p>The LVIA consequently concludes Moderate/ high sensitivity for these viewpoints, and in its justification stating the areas within which these VPs are located are '<i>not promoted routes, and considered as only local value</i>'. We disagree with this given the locations are within the AONB and therefore of inherent national landscape importance. We advise sensitivity should be upgraded to <u>High</u>.</p> <p><u>Magnitude of change</u> Considered Small at peak construction (AS1), Small/ moderate at Year 0 (AS2) and Small at year 15 (AS3), all adverse.</p> <p>We think this is seriously undervalued for these viewpoints in open access land, and advise magnitude of change for these VPs should be upgraded to <u>Large</u>.</p> <p>The justification states:</p> <p><i>'..the sight of any new built form and infrastructure would not be wholly unusual to users... given the land uses that are currently visually apparent, including different sized settlements (ie Ashford, Brabourne Lees, Brabourne, Aldington, Sellindge, Lympne, Stanford, Stowting and Postling), infrastructure and lighting of the M20, the elevated highways around Junction 11, the motorway service station, the motorway ,maintenance depot, the electricity convertor station, the high voltage overhead powerlines, the Lympne Industrial Estate, Dungeness power station, Little Cheyne Windfarm, the HS1 and Ashford-to-Folkestone railway and Westernhanger station.'</i></p> <p>We consider this statement to be misleading. The settlements referred to are on the whole small and old settlements, different in character, density and prominence as viewed from the AONB. Ashford is not contained in the view from VP5, and even when viewed from further along the AONB to the west, Ashford is generally of low density buildings and well hidden by mature trees and treelines. Other infrastructure such as the railway and motorway are not visible in this view, although Lympne Industrial Estate can be seen. The Dungeness power station and windfarm are so distant that they do not at all form a prominent focus in the view, and to be seen they must be searched for on a clear day.</p> <p>Otterpool Park however will present a completely new large scale town, of dense and high built form, in the AONB setting which is currently known for its rural semi-natural character. It will be clearly visible from this location and form a large and prominent feature across most of</p>

	<p>this view.</p> <p>The LVIA also states the creation of a town centre closest to the northern edge would ‘<i>help convey the visual legibility of the new settlement as a town, and not ‘sprawl’..</i>’. However we consider the town will be viewed as a whole built mass, with little distinction between the town centre and rest of the development.</p> <p>Further, whilst the magnitude of change may be relatively small during construction as it will be carried out in phases, the LVIA argues that by time of completion the ‘<i>development would be distinct</i>’ and not become the defining element in the visual experience. We consider this statement ignores the stark change that will occur when comparing the completed development to the baseline, which fundamentally changes the landscape character and views present at this location.</p> <p><u>Cumulative effects</u> There is no obvious separation between the development and Sellindge, which cumulatively provide a sense of considerably larger area having been developed, as seen from the scarp.</p> <p><u>Residual visual significance of effect</u> The LVIA considers significance of visual effect on these VPs to be Moderate/ minor at peak construction (AS1), Moderate at Year 0 (AS2) and Moderate/minor at year 15 (AS3), all adverse, but ‘not significant’.</p> <p>We strongly disagree with this conclusion. As we have advised, sensitivity and magnitude of change should be upgraded to high and large, respectively, so we advise residual significance of effect should be upgraded to ‘Major/ Moderate adverse’ permanent and significant.</p>
<p>27 (as assessed in LVIA for users and residents of Stanford)</p>	<p><u>Visual sensitivity</u> In the LVIA, VP 27 is considered to be of Moderate visual value for users and residents of Stanford. This is despite being within/ on the boundary of the AONB, on the scarp slopes with views overlooking the proposed development. We advise the visual value is upgraded to ‘High’ for these reasons, and that this area will be used by other visitors who are not local residents.</p> <p>The LVIA also considers susceptibility of VP 27 to be Moderate. We disagree and advise susceptibility should be upgraded to ‘High’, as this area provides for people engaged in outdoor recreation.</p> <p>The LVIA consequently concludes Moderate sensitivity for this viewpoint, and in its justification states the views experienced at VP 27 ‘<i>are only locally valued and contribute only moderately to the landscape setting enjoyed by the community as a whole</i>’. We disagree with this given the location is within the AONB and therefore of inherent national landscape importance. We advise sensitivity should be upgraded to ‘High’.</p> <p><u>Magnitude of change</u> Considered in the LVIA as Small at peak construction (AS1), Small at Year 0 (AS2) and Very small at year 15 (AS3), all adverse.</p> <p>We think this is undervalued for this viewpoint on the AONB scarp slopes near Stanford, and advise magnitude of change for this VP should be upgraded to ‘Moderate’, given the development will form a visible, distinct and recognisable change in the views from this</p>

	<p>location. Given the high density and height of the development in the north-central part of the proposed site, we do not consider structural planting will sufficiently mitigate the change in view from this location.</p> <p><i>Visual significance of effect</i></p> <p>The LVIA considers significance of visual effect on these VPs to be Moderate/ minor at peak construction (AS1), Moderate/ minor at Year 0 (AS2) and Minor/ moderate at year 15 (AS3), all adverse, but 'not significant'.</p> <p>We disagree with this conclusion. As we have advised, sensitivity and magnitude of change should be upgraded to High and Moderate, respectively, so we advise residual significance of effect should be upgraded to <u>Moderate/ major adverse</u> permanent and significant.</p>
<p>9, 14, 17, 18, 20, 22, 24</p>	<p>All these viewpoints, located within or just outside the proposed site, are currently subject to views of the AONB scarp to the north. Such views from the setting to the AONB scarp form a special quality for which the AONB is designated.</p> <p>The proposed development will severely minimise or altogether remove these views to the scarp, and severely affect the enjoyment of the AONB from its setting.</p> <p>This will result in a residual Major adverse, permanent, and significant effect on the AONB, from these viewpoints.</p>