

Appendix II - Swale Landscape Sensitivity Consultation - Summary of responses and actions

	Respondent	Agent/ Consultant	Sites of Interest	Brief summary of Response Received	Swale Borough Council & LUC's response
	Parish Council				
1	Tunstall Parish Council			Printed copies not available	Printed copies were made available to Parish Councils who requested them later in the consultation, in response to complaints such as this. Apologies to Tunstall as their request obviously did not get through to the appropriate person after the decision had been made to supply printed copies on request.
				Argue for upgrade to BR1 and SE4	LUC have relooked at BR1. Most of the criteria assessments are Low-moderate but the area has an important role in relation to AONB and is detached from any existing settlement edge (Bredgar and Sittingbourne). Overall Moderate seems appropriate, with the caveats included in text.
				Question the boundary definition in particular, BR1	The boundaries were agreed between LUC and SBC at the outset of the project, based on the methodology set out in in the Assessment, particularly paragraphs 2.8-2.9. The shape of BR1 does remove a chunk from SE4 but it is consistent with the approach throughout the Assessment
				BR1, 2, 3 and SE4 are all within Tunstall Farmlands LCA, so why is BR1 of lower sensitivity?	BR2 + 3 are in the AONB and whilst this doesn't necessarily confer a higher result the features of the AONB do contribute to the sensitivity of the area. BR1 assessed as Moderate for reasons set out in criteria (eg absence of boundaries and loss of traditional orchards, limited natural features, intensive arable farmland, absence of nature conservation designations)  Similarly, SE4 contains a local landscape designation and the features of this add to overall sensitivity.
				Why is BR1 not assessed as impact on Sittingbourne and on Bredgar as EH2 and MR1?	BR1 is not attached to Sittingbourne as SE4 intervenes

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				BR1 is same landscape character as BR2 and 3 and should be protected as part of the AONB	<b>BR1 not AONB, LUC have reviewed and on balance consider Moderate overall. See above for more detail.</b>
				Development types assessed are limited	<b>The development types were agreed between SBC and LUC at the start of the project. Types assessed do allow for general sensitivity assessment. More detailed site specific analysis would be required for any planning application etc</b>
				SHLAA sites are shown in the Important Local Countryside Gap. ILCG needs continued protection.	<b>SHLAA sites are shown where they were submitted and their presence does not confer any status. Thank you for comments on ILCG, although this is not a matter for this Assessment.</b>
				Generally found it difficult to access information from the Council on SHLAA sites submitted	<b>SHLAA informed this study but is separate from it. SHLAA will be reported to Local Plan Panel as a separate item.</b>
				No justification in study for why BR1 is of lower sensitivity than BR2/3	<b>Not AONB. See detail set out in assessment criteria and comments above.</b>
				BR1 description fails to mention good experience of 'dark skies'	<b>The Perceptual and experiential criteria does reference 'good experience of dark skies'.</b>
				'Dry valley' landscape type between Oakwood Cottage and Oakwood Orchard not mentioned	<b>Links to dry valley included already, but further minor reference added in response to this comment</b>
				Disagree with comments on Dove's Croft and implication that integration could be improved with more development. Dove's Croft was development of a brownfield site, not agricultural land as surrounding development would be.	<b>LUC have changed wording here in response to this comment so not promoting development as means of softening edge</b>
				Garden Communities agenda (from Swale's previous administration) has potential to pre-determine conclusions for assessment areas.	<b>This Assessment is an impartial and professional study and the results have not been influenced by any political agenda</b>
				BR1 has views to AONB but is not mentioned as setting to AONB in contrast to SE4	<b>Role in setting to AONB is included. Importance of views reinforced in response to these comments</b>
				SE4 is an odd shape and does not correspond to PC boundary.	<b>Agree SE4 is an odd shape, however, the boundaries were agreed between LUC and SBC at the outset of the project, based on the methodology set out in the Assessment, particularly paragraphs 2.8-2.9. The shape of BR1 does remove a chunk from SE4 but it is consistent with the approach throughout the Assessment.</b>

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					Size and shape is appropriate for this scale of assessment.
				Concerns over pre-determination as large SHLAA and ELR sites within area.	The SHLAA and ELR sites are shown in this Assessment as background (ie they have been submitted and have to be considered by the Council) and do not confer any status.
				SE4 - agree with medium-high sensitivity rating for residential however, think employment development should also be high due to impact on rolling dry valley, ancient parkland and rural lanes (including due to more cars)	No change. Has been reviewed and considered Moderate-high is appropriate and retains distinction with High areas.
				Pleased with proposed landscape designation but dismayed by ELR site within designation.	ELR sites are shown for information only and their presence does not confer any status
2	Bobbing Parish Council			Typo page 52 - A429 should be A249	Corrected
				Disagree with moderate rating of SE6 due to views from Rook Lane across Sittingbourne to The Swale and the Isle of Sheppey which would be lost if developed.	LUC have reviewed this and have reinforced reference to views in text however consider parcels retains a Moderate rating
				Page 150 - last para - areas converted to arable farmland are now being replanted as apple orchards (no specific location given)	LUC's welcome general observation but consider no specific observation needed in text
				Page 233 - last para - recommends new development 'does not impinge on settlement gap', however, this is already happening to east of Newington and Rooks Lane Demelza House development, creating ribbon development between Key St & Newington.	This study is about future development. LUC have added 'further impinge' to text.
				Typo page 238 - A429 should be A249	Corrected
				PROWs in this area offer fine views over Stockbury Valley and Chestnut St and Keycol Hill. Loss of hedgerows and wildlife lost in this area. SE area of NN2 would be particularly sensitive to development	LUC agree. Note added but Moderate conclusion remains appropriate
				No reference to loss of hedgerows/wildlife and resultant prairies	LUC have added small point
				Traffic pollution (A2, A249) affects vegetation and health	Thank you for observation. Traffic itself can have an impact on landscape sensitivity (perceptual and experiential qualities) but pollution itself is not directly relevant to this character study. No

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					<b>change.</b>
				Comments restricted to areas themselves and don't recognise impact on neighbouring areas.	<b>LUC agree and argue this is the correct approach.</b>
<b>3</b>	<b>Boughton &amp; Dunkirk PC</b>			Helpful, informative and well laid out report	<b>No change</b>
				59% of Swale designated - leads to constraints including to Neighbourhood Plan	<b>No change</b>
				Most relevant are FM1 and 2, and BK 1,2,3,4,5. Boughton and Dunkirk is regarded by PC as one community not separate settlements.	<b>Noted. No change required in this report</b>
				One SHLAA site shown has not be assessed as part of NP - land between Brenley Corner and Tin Bridge Oasts (FM1)	<b>N/A to this report</b>
				Vital permitted development respect separation of settlements between Faversham and villages	<b>Agree. This is included in the report already. No change</b>
				Any development in FM1 will have significant adverse impact on traffic - this hasn't been considered	<b>Not an explicit landscape issue in terms of this study – to be covered in transport assessments. LUC have added minor note.</b>
				FM1 should be classified with a higher sensitivity than 'moderate'. FM1 and FM2 both suffer air quality impacts from A2/M2	<b>Air quality impacts not relevant to this study LUC have reviewed and consider parcel should be retained at Moderate</b>
				FM2 has a clear appraisal. Future development will need to be minor and respect rural scene including lanes.	<b>No change</b>
				BK1 is accurately described. Development here should be resisted. Bypass reduces noise impact of road and there are unimpaired views to Foresters Lodge and the south. Sense of spaciousness along old A2. Guidance should be followed.	<b>No change</b>
				BK2 - any development should be limited as it would obstruct views south and could encourage knock on effect towards Rhode Common and South Street. Guidance should be followed. London Clay in this area can cause drainage problems.	<b>No change</b>

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				Development should be restricted in BK3. Drainage is complicated. Pleased to see recognition of views and woods.	No change
				BK4 should be protected from development. Well described in report. Narrow lanes.	No change
4	Throwley PC			Detail of report is excellent	No change
				All future planned developments must be preceded by infrastructure including roads, trains and essential services. This message needs to be reiterated to new members of SBC.	N/A to this consultation but comment noted.
	Iwade PC			<i>Engaged but no comments received</i>	N/A
5	Bredgar PC		BR1 and SE4	Reviewed in particular BR1, 2, 3 and surrounding landscapes	No comment necessary
				Strongly support much of the assessment but some cases where landscape sensitivity is under estimated	No change
				Suggest: BR1 (Residential) recommend adjusted from medium to medium-high BR1 (Employment) recommend adjusted from medium-high to high BR2 (Residential) recommend adjusted from medium-high to high BR2 (Employment) agree with assessment BR3 (Residential) recommend adjusted from medium-high to high BR3 (Employment) agree with assessment	LUC have considered these comments and consider that no changes to judgements made for these areas should be made as it would result in inconsistencies in approach across the wider areas.  LUC consider there are appropriate caveats in the text.
				Agree with LUC's identification of important characteristics	No change
				Insufficient weight has been given to the setting of the AONB - M2 is an artificial boundary. Request buffer to AONB and no development as noise/light will damage tranquillity/dark skies.	LUC have reviewed these comments and consider that appropriate weight is given to setting. Setting is more than just views and the AONB's Special Qualities have been considered and are expressed under the criteria.

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				Development north of the M2 will significantly harm the setting of the AONB	<b>LUC have reviewed these comments and consider there are appropriate comments and caveats in the text regarding this.</b>
				Development within AONB should be restricted as this will harm the AONB	<b>Agree and included in assessment text</b>
				LUC did not value highly enough the relationship between Bredgar and its placement in landscape and views identified in the 2017 local landscape designation review, which included need for an AONB buffer (response to LDD review attached)	<b>LUC have reviewed this and consider but no changes to assessment results needed.</b>
				Review should consider landscape sensitivity in light of possible repair to landscapes damaged by harmful farming practices	<b>Review considers existing situation, not potential. However, guidance on repair is given throughout report</b>
				Support guidance offered by LUC but would add the following:  Scale of growth should be considered - Bredgar is a parish of 270 properties and new development needs to be proportionate  Replanting of hedgerows should be promoted to enhance landscape, slow erosion, reduce blockage of drains and risk of flooding after heavy rain  Maintain and enhance landscape for biodiversity	<b>Added to guidance in BR1 and BR2</b>
<b>6</b>	<b>Bapchild Parish Council</b>			Thank you for the opportunity to comment	<b>No change</b>
				Difficult to work from electronic maps and no hard copies available.	<b>Printed copies were made available to Parish Councils who requested them later in the consultation, in response to complaints about difficulties in using electronic version. Apologies to Bapchild but we were not aware they required a hard copy.</b>
				Commenting in light of the intention of SBC to 'consider whether the landscape around the main urban areas has the capacity to accommodate new development, without causing significant adverse effects on its character'. The Swale area has been subject to a large increase in housing developments	<b>Thank you for comment which is noted, however, infrastructure is not a matter for this Assessment</b>

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				without the infrastructure to support the growth in population.	
				The National Planning Policy Framework 2019 Paragraph 20 states –  'make sufficient provision for d) conservation and enhancement of the natural, built and historic environment including landscapes and green infrastructure and planning measures to address climate change mitigation'.	<b>No change</b>
				Although we cannot see any sensitivity assessment being given specifically for air quality concerns we feel this is an important issue to be included as it makes the areas more vulnerable if development, either residential or for employment, is considered along the A2.	<b>Air quality is not an issue for this Assessment but will be considered as a separate exercise for the Local Plan Review.</b>
				The areas in and around Bapchild SE1 and SE2, include designations for important local countryside gaps and we support these designations as they are vital open spaces to separate our rural village setting from the Sittingbourne urban area. It is disappointing to see that, while the importance of the countryside gaps is emphasised, at the same time these areas are marked under the SHLAA Call for Sites and as sites for employment.	<b>The SHLAA and ELR sites are shown in this Assessment as background (ie they have been submitted and have to be considered by the Council) and do not confer any status.</b>
				We are concerned that the area North of the A2, SE1, is considered only medium sensitivity whereas the area South of the A2, SE2, is designated medium to high sensitivity. These areas provide a continuation of the views from the rolling valley landscape from Rodmersham on to the low-lying fields and the historic Tonge Conservation Area and therefore, we believe, both warrant a medium to high sensitivity assessment.	<b>No changes to judgements considered appropriate as changes would result in inconsistencies in approach across the study areas.</b>
	<b>Amenity Associations</b>				
7	<b>Faversham Society</b>	Anne Salmon		Sets out aims of assessment, policy background and methodology	<b>No change</b>
				Each area around Faversham and Boughton as set out in assessment is described in turn	<b>No change</b>

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				FM1 - guidance for development well founded	<b>No change</b>
				Opens up possibility of development north of the railway line in FM1 which could be contentious	<b>LUC added note about higher sensitivity north of the rail line</b>
				FM2 - assessed as high sensitivity which better places the Council to resist large-scale development along the Ashford Road, provided there is enough development elsewhere	<b>No change</b>
				FM2 - Fav Soc suggest revised wording to clarify meaning.	<b>The existing wording in the document is correct since it says that positive guidance does not mean that development is acceptable</b>
				FM3 - assessed as high sensitivity which will help the Council to resist housing pressure around any future Ospringe bypass or in Ospringe valley	<b>No change</b>
				FM4 - assessed as high sensitivity, and along with guidelines, should help Council justify maintaining the Western Link as the western boundary of the town	<b>No change</b>
				FM5 - appears little risk to this area at present (assessed as high sensitivity)	<b>No change</b>
				FM6 - assessed as high sensitivity. Of some concern that the arable fields north of Springhead Road are described as of limited scenic value and slightly less sensitive - potentially contentious as location for development (despite guidance given)	<b>LUC have reviewed and consider no further changes necessary</b>
				FM7 - assessed as moderate-high sensitivity with areas of higher sensitivity. There have been many planning battles over this area and designation of Abbey Fields Local Wildlife site was meant to reduce likelihood of this happening.	<b>LUC have reviewed and consider Moderate-high assessment is correct judgement</b>
				FM1-5 all assessed as high sensitivity except BK2 which is assessed as moderate-high. BK 2 is fairly well contained, but visible in longer views south from Canterbury Road, Dunkirk, from where the arable farmland contributes positively as a rural backdrop to the village with woodland beyond. Description and moderate-high sensitivity could be used to counter proposed development in this unspoilt area.	<b>No change</b>



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	Developers				
8	Hallam Land	Urban Wilderness	Ufton Court, Sittingbourne, Site sites within SE4	<p>Technical note prepared to evidence that development of site will not deter from the issues raised in the LUC assessment</p> <p>Desk-based study and site visit 3rd January</p> <p>Existing site is production orchard (25ha) and equine use (1ha)</p>	<b>No change</b>
				<p>Question LUC's approach to <b>defining extents</b> of areas - boundary of SE4 should be reconsidered as it combines setting to the AONB and the farmed plots neighbouring the urban fringe which area of contrasting character with a different degree of sensitivity to change. Site is heavily influenced by urban edge of Sittingbourne and Borden and allotments off Riddles Road and more enclosed than AONB</p>	<b>It is based on broad character parcels and not land use. No change proposed. The variation is brought out in the assessment.</b>
				<p><b>Topography</b> - there is a lack of intervisibility and visual continuity between edge of Sittingbourne and the AONB which reduces overall sensitivity of the urban fringe landscapes. Views from site are enclosed by built form, topography and vegetation</p>	<b>There are areas of similar character with the AONB</b>
				<p>Consider development to south of Sittingbourne could be accommodated without loss of <b>natural character</b>/natural elements rather opportunity to strengthen natural features and increase woodland cover</p>	<b>LUC consider Moderate-high assessment does not preclude this, and notes included under spatial variations and guidance</b>
				<p><b>Time Depth/historic character</b> - development would retain setting of Conservation Areas and limited impact on Tunstall Conservation Area due to possible setbacks and screening of any new development. Would not result in loss of traditional orchard, rather production orchard</p>	<b>No change</b>
				<p><b>Visual character</b> - views are limited due to enclosed character</p>	<b>No change</b>
				<p><b>Perceptual and experiential</b> - development has potential to clearly define development and screen new infrastructure to reduce urbanizing effect of Sittingbourne and maintain the sense of rurality</p>	<b>No change</b>

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				<b>Character and setting</b> - should development come forward a gap of 500m could be maintained between Borden and Sittingbourne (larger than gap between Borden and proposed development at Wises Lane) and 225m to Tunstall	<b>No change</b>
				By grouping site into wider study area its character is considered rural and sensitivity is artificially elevated. If site and neighbouring field were assessed individually it would much reduce sensitivity outcome across most criteria to low-moderate.	<b>This is a character assessment. Individual sites may be different, and this is covered in the report intro para. 116 - 120.</b>
				Overall, believe sites should be considered separately from rest of SE4 and LUC should have concluded a Moderate Sensitivity for this local area.	<b>Don't agree – see comment directly above</b>
				LUC's assessment is not recorded so not transparent. Important as BR1 is assessed as moderate, despite lying above ridge line and more important as a setting to the AONB	<b>LUC have looked at BR1 and it is a very fine line between Moderate and Moderate-high. After consideration has been left at Moderate but with caveats noted in text</b>
				Draft proposed scheme is included in report showing proposed gap, opportunities for landscaping and creation of softer, defined, urban edge.	<b>No change</b>
<b>9</b>	<b>Crown Estates</b>	Wood	Furze Hill, Halfway	Assessment fails to acknowledge the variations in character of the assessment area, in particular the urbanised nature of the surrounding area, particularly to the west which is characterised by employment, retail and residential development along Queenborough Rd.	<b>LUC have reviewed and added minor point to spatial variations section to reflect this</b>
				Concept plan developed which could provide 600 dwellings on 20ha, focused on lower lying areas and ensuring development is visually contained by recent employment development at Queenborough  This plan is supported by landscape review which demonstrated 1) urbanised nature of surrounding area at Queenborough and limited range of views of the lower lying land from surrounding areas and 2) how a development concept can create a high-quality development whilst avoiding more sensitive higher land (some details given, not summarised here)	<b>LUC have reviewed but concept plan unlikely to change rating</b>  <b>Added qualifier re urban edge at Queenborough but maintained overall rating given importance of topography in this area</b>

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				Conclude western part of study area should be reassessed as low-medium sensitivity.	
<b>10</b>	<b>Attwood Ltd</b>	Landscape Collective	North of Faversham	<p>Study methodology on whole is accepted but wish to make specific reps on FM7 and request reconsideration of assessment</p> <p>Argue that overall landscape parcel should be reassessed as moderate rather than moderate-high sensitivity - and argues this by addressing all criteria used in the assessment</p> <p>Study does not consider landscape capacity and previous Swale Urban Capacity Study 2010 is outdated and no longer appropriate</p> <p>Systematically addresses all points made in the FM7 assessment</p>	<p><b>LUC have reviewed comments and consider Moderate-high is appropriate overall</b></p> <p><b>Have added caveat that small areas adjacent to the existing urban edge in the south may be of lower sensitivity</b></p>
				<p>Landscape value - argues that limited intervisibility with AHLV and sensitivity should not be raised merely due to proximity</p> <p>Topography - argues site is not broadly flat or has little enclosure</p> <p>Natural character - argues that much natural character has been lost</p> <p>Sense of time depth/historic character - study for instance overplays importance of Conservation area</p> <p>Visual character - views limited or compromised and hard settlement edge</p> <p>Perceptual and experiential qualities - argues not tranquil due to railway, sewage works, solar farm and urban edge</p> <p>Character and setting - suggests low-moderate sensitivity (though no explanation given by consultants here)</p>	<b>As above</b>
<b>11</b>	<b>BDW Trading Ltd</b>	<b>DHA Planning</b>	<b>West of Cryalls Lane, Sittingbourne</b>	<p>Site of interest is within parcel SE4.</p> <p>Site is a designated Local Green Space (LGS) in adopted</p>	<b>LUC reviews and concluded no change to judgement, but included note that there may be some small areas of lower sensitivity in relation to</b>

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				<p>Local Plan, however is unmanaged and subject to anti-social behaviour</p> <p>Site adjacent to Local Plan allocation MU3, Westlands Secondary School and existing residential development</p> <p>If MU3 goes ahead site will be surrounded by development, as such redevelopment would not cause harm as would be infill site. Indeed leaving site unmanaged would lead to further anti-social behaviour issues</p> <p>Site could be developed with some community greenspace and east-west connectivity</p> <p>Argues site should be released from LGS designation as does not meet tests, is in a sustainable location and suitable for residential development</p> <p>Site was included as draft allocation in 2013 draft local plan, however, members voted to remove it as an allocation due to fears of coalescence with Borden</p>	<p><b>the existing urban edge.</b></p>
12	Shaptor Capital Ltd	DMH Stallard/ Lizard Landscape Design	Foresters Lodge Farm, Dunkirk	<p>Representations relate to substantive part of BK2 and small part of BK1</p>	
				<p>Note recent guidance on Landscape Sensitivity Assessments by Natural England in June 2019. Consider LUC Report substantially consistent with NE guidance</p> <p>Developer has prepared Landscape and Visual Appraisal for</p>	<p><b>LUC have added reference to a compliance with Natural England, June 2019 guidance in the methodology section</b></p> <p><b>LUC have review representation and comment that the detailed assessment for individual sites is appropriate at development site level but sites must be considered in their wider landscape context.</b></p> <p><b>Developer's appraisal is at a different more detailed scale to the landscape character sensitivity study intended by this document</b></p>

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				<p>site as if a New Garden Community (as separate document)</p> <p>BK1 has been assessed as high sensitivity, although are spatial variations</p>	
				<p>BK1 - assessment does note reduced tranquillity resulting from road noise in close proximity to A2. Question whether error has been included - north/south of A2</p> <p>BK1 - Respondant believe their site north of A2 in Dunkirk has low degree of openness</p> <p>BK1 - Recommend assessment (for their site within the wider assessment parcel) is changed from high sensitivity to moderate sensitivity</p> <p>BK2 - agree assessment of moderate-high is substantially consistent with Landscape Sensitivity Assessment Area (??)</p> <p>BK2 - some attributes of area atypical of Blean Woods West Landscape Character Area, indicating moderate sensitivity (the meaning here is not clear)</p> <p>BK2 - comments on Natural Character - however, point is not clear.</p> <p>BK2 - comments on Tranquillity and Remoteness - assessment does not identify presence of wind turbine</p> <p>BK2 - comments on Character and Setting of Settlement - some of the arable land identified is north of the A2 (and therefore within BK1) (<b>LUC response - this is not in this sensitivity parcel</b>)</p> <p>BK2 - in some places it is unclear what the respondent is arguing here</p>	<p><b>LUC have checked and confirm no error here</b></p> <p><b>BK1:</b></p> <p><b>Added some points of detail</b></p> <p><b>Sensitivity will remain at High, and cannot be subdivided by individual sites. This study is not a site by site assessment. Overall assessment unchanged.</b></p> <p><b>BK2:</b></p> <p><b>The judgement of Moderate-high is correct here. The site has to be seen in its wider Blean context, noting that there are some atypical elements</b></p> <p><b>Tranquillity and remoteness is referenced</b></p> <p><b>Note that wind turbine and tranquillity are identified</b></p>
13	Gladman	Randall Thorp	South of Faversham	<p>Respondant's interests lie in area adjacent to the A251 within FM2 and FM3</p> <p>Respondant sets out policy context and the published landscape character assessment</p> <p>Considers in some details policy and guidance on rural lanes in the area</p> <p>Considers AONB Management Plans and guidance and</p>	<p><b>No change</b></p>

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				<p>Landscape Assessment of Kent (2004)            Considers landscape and townscape character of the study area and summarises landscape, townscape and visual considerations            Considers methodology of LUC's Assessment is sound</p>	
				<p>However, the findings in respect of the sensitivity of the study area are not reflective of local landscape character             Does not agree with justification for boundary between FM2 and FM3 - landscape character either side of road is broadly similar</p>	<p><b>Parcel area boundaries agreed between LUC and SBC at start of project as sensible size assessment parcels. Agree that there are similarities between FM2 and FM3 and they have the same sensitivity ratings</b></p>
				<p>Rather, study area should be reassessed as a separate landscape sensitivity parcel</p>	<p><b>Parcel area boundaries agreed between LUC and SBC at start of project as sensible size assessment parcels. This study is a sensitivity assessment to inform the preparation of the Local Plan, not an assessment of individual development sites.</b></p>
				<p>FM2 - Argue that large scale arable fields are less sensitive and this element is not weighed appropriately in the assessment</p>	<p><b>LUC reviewed comments and do not agree. Large arable fields are weighed in overall assessment</b></p>
				<p>FM2 - most sensitive part of assessment parcel is not of landscape character typical of the wider designation and should be afforded less weight</p>	<p><b>LUC reviewed comments and do not agree that this area is all closely related to M2/A2 and therefore has less weight</b></p>
				<p>Distinction should be drawn between the sensitivity of the landscape within or visually related to the AONB            Few Rural Lanes within FM2 so sensitivity should be reduced            Presence of A251 and M2 reduce tranquillity and limited PROW reduce ability for perception of intrinsic qualities, both reducing sensitivity            FM3 - Open fields are less sensitive            FM3 - does not agree with assessment that fields north of M2 are less scenic/sensitive            FM3 - Few rural lanes within FM3 so sensitivity should be reduced            FM3 - Few rights of way so less sensitive            FM3 - landscape assessment parcel not representative of the AONB or AHLV            Appropriate weighting needs to be given to national and local designations, and their settings</p>	<p><b>LUC reviewed representation and consider that spatial variations have been identified. Sensitivity remains the same at this scale of assessment recognising that there will be differences looking at any area in more detail.</b></p> <p><b>A note on how landscape value is dealt with has been added to the method.</b></p> <p><b>Agree that there will be local areas of variation within the assessment areas</b></p>

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				<p>FM3 prose style is evocative of a landscape which is not representative of what's there - eg commercial, intensive orchards screening views</p> <p>Overall, given spatial variations in sensitivity within FM2 and FM3 the overall assessment of landscape sensitivity could be considered disproportionately high</p> <p>A revised landscape sensitivity area would result in the study area being found less sensitive than currently assessed</p>	
14	Quinn Estates	David Williams Landscapes	South Sittingbourne	<p>Reviews scope, methodology and policy content</p> <p>In concentrating around settlements mustn't over estimate sensitivity of these landscapes which by their location are most sustainable.</p> <p>Flaw in report by not defining value (few /no designations) and elevating sensitivity in areas.</p> <p>Study fails to properly consider existing noise, tranquillity and light pollution around Sittingbourne.</p> <p>Not clear how ratings have been arrived at and inconsistencies</p> <p>Report claims to look at sensitivity but not capacity. However, DWL considers it is a capacity assessment (including looking at value) for specific types of housing and employment, not a sensitivity assessment. Explores this with reference to NE Topic Paper 6.</p> <p>Critique of development types assessed.</p> <p>Omissions in desk-top study ( Swale Urban Extensions Landscape Capacity Study and KCC's LCA)</p> <p>Study should exclude MU3 site, Local Green Space and Westlands in SW Sittingbourne and instead use built up area boundary. Inconsistency here</p>	<p><b>HLC is not relevant to page 11. It is included as a source of information with ref to time depth criteria</b></p> <p><b>Sustainability will be a separate judgement and high or moderate sensitivity will suggest greater mitigation will be required</b></p> <p><b>This is not a flaw but wording modified to make clear. Information added to introduction to explain how value is taken into account in relation to individual criteria.</b></p> <p><b>Study does consider noise, tranquillity and light pollution</b></p> <p><b>Ratings have been derived using professional judgement based on specified criteria</b></p> <p><b>Topic paper 6 is very out of date and has been replaced. It does not provide a definitive method. The method is in line with the '2019 Approach' which refers to capacity as a quantum of development</b></p> <p><b>The development types were agreed between SBC and LUC at the start of the project. Types assessed do allow for general sensitivity assessment/broad indicators.</b></p> <p><b>Swale Urban Extensions Landscape Capacity Study not omitted</b></p> <p><b>Does not make a difference overall</b></p>

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				<p>Value should be properly included as done in other LUC studies. Criteria should also be included and examples given</p> <p>ILCG should be scoped out of the assessment as not relevant etc</p> <p>Policy content should be updated/corrected</p> <p>Reviews individual assessment areas by criteria for SE1, SE2 - arguing for reduced sensitivity, for instance for reasons of setting of AONB (eg argue: SE1 should become low-moderate; SE2 should become low-moderate; SE3 to become moderate-high; SE4 to be divided along Ruins Barns Road and eastern side to become moderate-high and western side to become moderate; SE5 to become moderate; TM1 to become low-moderate; BR1 should be low-moderate for housing and employment.) LUC to review specific details</p> <p>Questions overall assessment and why sometimes rankings (eg moderate) are included and other times not.</p> <p>Request document is corrected and consulted on again (SBC) <b>SBC</b></p>	<p><b>See clarification note in introduction explaining how value is dealt with</b></p> <p><b>The ILCG policy is not included but role of landscape in providing separation is relevant</b></p> <p><b>Policy context has been updated.</b></p> <p><b>Note that this study is not intended to identify valued landscapes. It does not elevate sensitivity in absence of designations and text has been amended throughout document if this was not clear to the reader</b></p> <p><b>See below for full comments. LUC do not agree with wholesale lowering of sensitivity</b></p> <p><b>This has been amended. It is a professional judgement and not an equation</b></p> <p><b>This assessment will be reported to Local Plan Panel in November 2019 where decisions as to whether to accept this as evidence for the local plan will be made.</b></p>
				<p><b>David Williams goes on to a detailed critique of each landscape parcel of relevance to their interests. LUC's comments are provided below.</b></p> <p><b>SE1 – LUC RESPONSE</b></p> <p><b>No need to change maps – these do not influence judgements</b></p> <p><b>Page 11 is not intended to list sources of info. HLC is referenced on page 19</b></p> <p><b>Visual character is not a reference to valued views</b></p> <p><b>Perceptual – included note on tiny part of power line</b></p> <p><b>Character and setting of settlement – mentions landscape</b></p>	<p><b>LUC comments provided in column to the left</b></p>



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				<p>role of rural gap not the policy  The ranking does not increase to moderate because of absence of designations  AHLV setting – remains relevant</p>	
				<p><b>SE2 – LUC RESPONSE</b>  No need to change maps – policies included for info only  Value – this does not elevate the judgement – it is a statement of fact  Topography and scale – reference to the dip slope is correct and does not elevate sensitivity  Natural character – changed text to make clearer  Time depth – HLC not relevant to page 11 but ref on page 19  Views agree – but this is about visual character not specific viewpoints  Settlement – as above – role of rural character not policy  Misreading of summary – absence of designations does not elevate but this is made clearer in the text  AONB and AHLV setting – consider that this remains relevant  Undeveloped gap/sense of rural character as function of landscape is relevant</p>	
				<p><b>SE3 – LUC RESPONSE</b>  Sense of time depth: The historic villages are relevant to character  Visual character – ref to scenic quality moved to perceptual/experiential  Setting of AONB – change to representation of special qualities  Views – agree but this is not LVIA and refers to visual character not specific receptors  Gap – see above  There is no reason why this overall judgement should not be the same as the AONB. The designation does not automatically elevate sensitivity.</p>	
				<b>SE4 – LUC RESPONSE</b>	No change re boundary and MU3 in this strategic

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				<p>No changes to mapping proposed  Value – statements are based on prof judgements, minor changes in text re setting  Topography – this area is part of the dip slope  Perceptual – dark skies is modified in text, M2 is noted  Character of settlement edge – rural separation is relevant part of character  Overall assessment – stand by this and Mod-H overall, although note that areas of lower sensitivity may exist within</p>	<p>level study but note added re smaller sites with lower sensitivity related to the existing urban edge</p>
				<p>SE5 – LUC RESPONSE  Ref to A249 included  Value – amended – not subject to national or local designations.  Topography and scale – dry valley mentioned and race horse training  Natural – note A249 is considered under perceptual  Time depth – as above no change  Views – views to Sittingbourne are included in text. Refer to visual character and not receptors  Character – rural separation and identity retained as part of character  Judgement – retain at M-H but minor text amendments to ensure clearer. Ref to maintaining rural character between settlements is retained</p>	
				<p>TM1  Farmsteads – added ref  Landscape value – statement of fact and retained as these adjoin the area and there are views out over these areas  Topography – suggest moderate  Natural character – agree low for this criteria alone  Time depth – Ref under criteria and not relevant to pg 11, Text confirms CA are at edge, adjacent. Parkland ref - removed  Visual character – as above refers to visual character not LVIA receptors  Settlement edge – added ref</p>	

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				Overall – refer above re text on local landscape designations (does not elevate). We consider that while there are elements of moderate it is higher than TM2 and should be retained at H-M	
				<p><b>TM2</b></p> <p>Description – added re farmsteads</p> <p>Value – see above – as there are no LLDS directly abutting this area they have been removed from text</p> <p>Topography – we considerate moderate overall</p> <p>Natural character – agree that this criteria alone is low and this is clear in the text</p> <p>Time depth – parkland characteristics were observed in fw in this area</p> <p>Visual – as above – not LVIA</p> <p>Character of settlement – this info is included in the conclusion</p> <p>Overall – We have reviewed and consider M to be appropriate overall in this area</p>	
				<p><b>BR1</b></p> <p>Landscape value – the fact that it is no designated is noted</p> <p>Topography – correction made</p> <p>Natural – agree changed</p> <p>Time depth – agree HLC ref under criteria</p> <p>Visual character – as above – general visual amenity not receptors</p> <p>Perceptual – area does have some dark skies</p> <p>Overall – agree that many criteria are low but the area has an important role in relation to the edge of the AONB and also is detached from Bredgar and Sittingbourne. The moderate rating is appropriate in this location</p>	
15	St John's College	Savills	Ospringe	Assessment questioned due to 1) the way that the sub-areas have been split fails to enable an understanding of how recent developments/permissions south of the A2 may affect the context being assessed and 2) assessment fails to make specific reference to call for sites areas, despite identifying	<p><b>1) Where developments have been built out/allocated they are included in the assessment Note that the spatial variations within areas are noted</b></p> <p><b>2) Call for sites are included as context only</b></p>

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				<p>their locations which risks misleading readers to assume that the call for sites promotions have been considered in the report's conclusions</p> <p>Sub areas are too large in extent eg FM3 contains two very different areas, north and south of the M2</p> <p>Are administrative errors in mapping (however, none are specifically identified)</p>	<p><b>Sub areas need to be large at this strategic scale of work – spatial variations within are generally identified</b></p> <p><b>No mapping errors identified</b></p>
16	Duchy of Cornwall	LDA Design	SE of Faversham	<p>Note assessment was published prior to publication by Natural England of 'An Approach to Landscape Sensitivity Assessment' in June 2019. Recommend assessment is reviewed against this latest guidance.</p> <p>Broadly agree approach is appropriate, however, does not account for local variations eg within FM1 to north and south of A2, despite acknowledgement that FM1 (and FM7) contain notable variations</p> <p>Assessment conclusion is in contrast to that in LUC's New Community Landscape Advice which judges area as moderate/low-moderate overall sensitivity. FM1 should be divided into two assessment parcels to acknowledge observed differences and reflect NE guidance</p> <p>Recommend A2 should be used as demarcation line - with lower sensitivity south of A2 and higher sensitivity north of A2</p> <p>Are other examples of smaller sensitivity assessment parcels so precedent exists</p>	<p><b>Notes added in the introduction re 2019 landscape sensitivity method conformity. See para 2.16</b></p> <p><b>This is a strategic study although smaller parcels are noted. In this case the spatial variation is identified in the text. To identify a parcel with a lower sensitivity for an area put forward as a garden settlement may not appear to be robust. No changes to assessment areas made re parcels</b></p>