



Land east of Stock Green, Wychavon
Review of Landscape and Visual Matters

18th April 2023



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Section 1: Introduction

Background

- 1.1 Annabelle Langhorn Landscape Planning Limited (ALLP) has been instructed by Farrer & Co, on behalf of local residents, to undertake an independent review of the Landscape and Visual Impact Assessment (LVIA) completed by Pegasus Group in relation to the proposed solar farm development (Ref: W/23/00270/FUL submitted to Wychavon District Council) at Land east of Stock Green, Wychavon (hereafter referred to as the 'site'). The LVIA prepared by Pegasus formed a chapter within an Environmental Statement (ES), also prepared by Pegasus Group, and was prepared on behalf of JBM Solar Projects 11 Ltd (hereafter referred to as the 'Applicant').
- 1.2 This report provides a technical and impartial review of the LVIA submitted within the ES. In order to support the review of the LVIA and application proposals, the following tasks have been undertaken by ALLP:
 - An independent peer review of the LVIA (within the ES); and
 - An independent review of the Landscape & Visual context of the site.
- 1.3 The review has been undertaken by Annabelle Langhorn CMLI, a landscape planning consultant with over 13 years experience in private practice, whose experience ranges from working on multi-disciplinary projects, Environmental Impact Assessments and strategic promotional work, through to detailed planning applications and various stages of public inquiry and appeal work. Project experience has included flood alleviation work and coastal managed realignment, utilities and wastewater treatment plants, sports stadiums, 20,000 home settlement expansions, and extensive green belt and greenfield housing, commercial and employment projects. The peer review has been undertaken in accordance with good practice guidance published by the Landscape Institute¹. The landscape and visual context has been reviewed in accordance with the Guidelines for Landscape and Visual Impact Assessment Third Edition 2013 (GLVIA3).
- 1.4 Pegasus Group's LVIA comprises an ES Chapter, running to 52 pages, which is supported by the following appendices and figures:
 - Figure 2.1: Topography
 - Figure 2.2: Landscape Character Plan
 - Figure 2.3: Landscape Features Plan
 - Figure 2.4: Viewpoint Locations Plan
 - Figure 2.5: Screened ZTV
 - Figure 2.6: Photoviews
 - Figure 2.7: Indicative Landscape Sections
 - Appendix 2.1: Landscape Effects Summary Table
 - Appendix 2.2: Detailed Visual Effects Table
 - Appendix 2.3: Photomontages
 - Appendix 2.4: Environmental Enhancement Strategy (EES)

¹ Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs); Technical Guidance Note 1/20



Structure of the Review

1.5 This Review is structured as follows:

Peer Review of the LVIA:

- Checking the methodology used to undertake the assessment, the criteria selected (including balance between), and the process followed;
- Checking the baseline, content and findings of the assessment;
- Checking the presentation of the assessment findings.

Independent Review of the Landscape & Visual Context of the Site

- A site visit to review the site itself and the surrounding landscape;
- Review of the landscape character of the site and surrounding landscape, including site-specific observations and analysis, as well as an analysis of the site within the context of available published character studies;
- Review of the visual context of the site and surrounding landscape;
- A professional opinion on the value of the landscape within the site, based on the baseline work presented within the LVIA and ALLP's own baseline studies undertaken in accordance with the guidance contained within GLVIA3; and
- Review of the professional judgements set out within the LVIA prepared by Pegasus and confirmation of whether the findings are fair, and representative of the specific landscape and visual context of the site.

1.6 The Peer Review has followed the review prompts as set out within the LI's guidance note, which comprise a series of questions for the Reviewer in order to assess the completeness of the LVIA and whether it has been undertaken in accordance with best practice, with 'best practice' relating to the guidance set out within GLVIA3².

² Guidelines for Landscape and Visual Impact Assessment Third Edition; April 2013; Landscape Institute and Institute of Environmental Management and Assessment



Section 2: Peer Review of the LVIA

Checking the Methodology, Criteria and Process

Does the scope of the assessment meet the requirements set out in the Scoping Opinion and / or as defined in the LVIA or LVA and if substantively different, are the reasons clearly set out and explained?

- 2.1 The scope of the LVIA was agreed with Wychavon District Council (WDC) and follows the Scoping Opinion contained at Appendix 1.2 of the ES. Landscape and Visual Impact was scoped in, and the Council noted the following:
- The viewpoint locations were deemed acceptable and representative: *“Although there is no record which definitively confirms that all viewpoints are agreed – there were a series of exchanges regarding viewpoint locations, in which additional viewpoints were requested and these have since been accommodated.”*
 - Glint and Glare visual and landscape impacts should be appropriately cross referenced and explained within the LVIA;
 - The LVIA should refer to National Character Areas;
 - The ES should include a full assessment of the potential impacts of the development on local landscape character using landscape assessment methodologies, with the Council recommending the use of Landscape Character Assessment based on the guidelines set out within GLVIA3.
 - The Council drew the attention of the Applicant to the comment received from Inkberrow Parish Council highlighting concern that views from the high points above Morton Underhill have not been considered, which concerned them since there are *“unspoilt views across the countryside from this location”*.
 - Cumulative effects of other development proposals has not been undertaken as WDC confirmed there are few recognisable cumulative effects anticipated.
- 2.2 The above points appear to have all been followed within the LVIA, with the exception of a review of elevated views from above Morton Underhill, which are not included within the LVIA, not referenced at any point, and not shown as included on the Viewpoint Location Plan (Figure 2.4). The route of the Millennium Way, as well as numerous other Public Rights of Way follows an elevated ridgeline above Morton Underhill, to the north-east of the site. This is readily visible on OS mapping and falls within the Applicants own screened ZTV but has not been picked up within the LVIA despite the Scoping Opinion specifically requesting this.
- 2.3 At Para 2.3.42, the LVIA states that an analysis of landscape value has been carried out in accordance with Box 5.1 of GLVIA3 but that the landscape factors identified within Box 5.1 have not been analysed in detail *“due to the scope of this LVIA”*, with only a general commentary provided instead. It is not clear when this was scoped out of the LVIA, or why. Given the scale and sensitivity of the proposals and the site, and the Council deeming the application to warrant the most detailed approach to LVIA possible via this being scoped in to the EIA, it would be expected for a full analysis of the Box 5.1 aspects to have been included within the evaluation of Landscape Value contained within the LVIA. This has not been undertaken.
- 2.4 Furthermore, the landscape value criteria at Box 5.1 were supported and expanded upon by the Landscape Institute (LI) in 2021 through the publication of a new Technical Guidance Note (TGN) which is the LI’s most up-to-date reflection on the subject of landscape value³. There is no reference to this document within the LVIA and very little analysis undertaken to reflect the aspects and descriptions set out within the TGN.

³ TGN 02-21: Assessing Landscape Value outside National Designations



What consultations have been carried out and have responses been acted upon?

- 2.5 There is no evidence of any consultation contained within the LVIA, however it is noted at several paragraphs that parts of the design of the scheme have been altered in response to consultation undertaken with specific residents and members of the public. Although this does allude to consultation having been carried out to some degree no detail is provided.
- 2.6 The responses to consultation with WDC undertaken during the screening and scoping process have not been fully acted upon as set out above as the LVIA has not included any assessment of views from elevated locations to the east of Morton Underhill. The screening response from the Council stated that particular regard must be made to the size and scale of the whole development within the ES. The Council stated that *“the development is over 100 hectares in size much of which would be on rising open land which means that it is likely to have a significant visual impact on the landscape and could result in potentially harmful environmental effects”*. This is not referred to within the LVIA, nor is there any discussion regarding the scale of the proposals in relation to the wider landscape and visual context of the site. Furthermore, the visual impact assessment process has been found to be severely lacking in that important key viewpoints have been missed (elevated locations to the east of Morton Underhill), receptors have not been assessed (users of public rights of way and users affected by views of the construction of the cable route) and the approach within the LVIA of only providing an assessment of the visual effects on viewpoints, rather than on receptors.
- 2.7 The screening response also refers to the need for attention to be paid to *“landscapes and sites of historical, cultural or archaeological significance”*. The extent to which the LVIA address any historic, cultural or archaeological significance linked to the site or surrounding area is limited to reference to the field boundaries within the site being historic, the intention for lost historic field boundaries to be restored through the proposed development mitigation measures, and reference to impacts on listed buildings. The LVIA does not undertake a historic or cultural review of the landscape in terms of its value. The historic interest of Roundhill Wood has been under-stated in the ES reporting. The wood is a significant survival of a large medieval wood which extended across the site until largely assarted in the Middle Ages. The wood is a distinctive landscape features which is recognisable as historic, and it is designated as Ancient Woodland. It forms a notable boundary element to the south and east for users of the Public Rights of Way that cross the site and is visually associated with the surviving hedgerow trees and the presence of a veteran pollarded oak which lies in close proximity to it. The contribution that Roundhill Wood makes to the landscape value of the site has not been considered.
- 2.8 Other interesting and noteworthy components of historic landscape within and surrounding the site have not been identified or referenced within the LVIA, including the veteran pollarded oak within the site, the scattered timber-framed houses and hedged fields.
- 2.9 The cultural significance of the potential relationship between the site and Tolkien is not referred to. There is a link to Tolkien within the study area as Dormston Manor is where his Aunt once resided and Tolkien is known to have spent summers there. Dormston Manor is visible from within the site. This is expressly acknowledged by the Council’s Conservation Officer in her response to the screening application (W/22/01154/SCR) on 22 June 2022 in which she states, *“This area is strongly connected with JRR Tolkien as he would visit and stay in Bagend Farm (now Dormston Manor) and would have walked these very footpaths.”* This cultural/historic value has not been incorporated into the analysis of landscape value, despite the cultural, historical and archaeological significance of the landscape having been specifically referred to within the Screening Opinion and despite the Conservation Officers comments also within the Screening Opinion.

Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?

- 2.10 The scope of the assessment was agreed with WDC and the Scoping Opinion is contained at Appendix 1.2 of the ES. Para 2.2.62 of the LVIA states that the Scoping Opinion was used to inform the content of the LVIA. However, through the process of undertaking this Review it has become apparent that not all of the Scoping Opinion contents have been followed with regards to Landscape and Visual Impacts.



- 2.11 The Scoping Opinion notes that Inkberrow Parish Council made comments with regards to the lack of viewpoints chosen to assess the visual impact of the proposals, specifically in relation to views from high points above Morton Underhill. Having undertaken an independent review of the local landscape, the topographical arrangement of the land, and with reference to the Figures contained within the Applicant's LVIA, it seems that the high points above Morton Underhill that Inkberrow Parish Council refer to relates to the ridgeline to the east of the settlement, along which the routes of numerous Public Rights of Way and the Millennium Way run. There are several points along this elevated ground from which wide, long-distance views are possible, across the landscape, with the site clearly seen against the backdrop of Roundhill Woods. Given the reference to these views within the Scoping Opinion, the assessor should have included an assessment of views from this location within the LVIA. The views have neither been captured via viewpoint photography, nor assessed within the narrative of the LVIA.
- 2.12 The Scoping Opinion states that there was no record that definitively confirms that the viewpoints chosen to be representative of the likely visual impacts, and key public locations from which the development could be visible, were appropriate. But it states that the Landscape Officer has confirmed that the scope of viewpoints included within the Viewpoint Location Plan at Appendix D of the Scoping Report was agreed nonetheless. The elevated land to the east of Morton Underhill is noticeable on the Topography Plan contained within the LVIA, is included within the area identified by the ZTV, and is traversed by numerous public rights of way, including the Millennium Way. The Landscape Officer has not picked up on this during the Scoping process, and neither has the Applicant. As this ridgeline is one of the few locations within the vicinity of the site from which long distance elevated views of the development would be possible, this should have been picked up and included within the Viewpoint selection. Consequently, the LVIA does not assess impacts on these users at all. Even if the Viewpoint selection had already been deemed to be acceptable by the Council's Landscape Officer, the content of the Scoping Opinion alerted the assessor to the potential for long distance views from the ridgeline to the east of Morton Underhill and these views should therefore have been covered within the LVIA.
- 2.13 The Scoping Opinion requests that Glint and Glare visual and landscape impacts should be appropriately cross-referenced and explained in the Landscape and Visual Impact section of the ES. The LVIA makes reference to the findings of the Glint and Glare Assessment submitted as part of the application, which identified a series of residential properties along Earls Common Road to the north and north-west of the site, which would be affected by glint and/or glare if mitigation planting were not implemented within the scheme design.
- 2.14 At Paragraph 2.3.84 the LVIA states that additional planting and management regimes for the existing vegetation "*would provide adequate screening to mitigate the effects of glint and/or glare*". At Paragraph 2.5.6, the fifth bullet point states that mitigation to screen glint and glare for these properties comprises new tree planting to the north-western boundary of the site and management of the existing hedgerows to allow them to reach a height of at least 4-5m. There is no reference within the LVIA or the Glint and Glare Assessment that sets out that this mitigation will reduce or restrict and glint and/or glare.
- 2.15 The Glint and Glare Assessment only assesses the proposed development with mitigation in place, and not without, and it is not comprehensive in its inclusion of receptors as it does not consider the effects of glint and glare on users of local public rights of way. Without mitigation, it would be possible for glint and/or glare to impact users of the public footpaths crossing the site, and within the surrounding landscape, but this is not mentioned, or assessed within either the Glint and Glare Assessment, or the LVIA. It is possible that the proposed landscaping would provide sufficient screening for the residential receptors identified as well as for users of local roads and local public rights of way, but the Applicant has not robustly demonstrated this, and in the case of the users of local roads and public rights of way, not considered it at all.
- 2.16 The only other references to glint and glare in the LVIA are at Paragraph 2.4.3 where there is reference to the panels being coated with an anti-glint and glare coating, and at Paragraph 2.5.17 where it states that "*Glint and Glare was scoped out of the ES as confirmed in the Scoping Opinion...and therefore no significant effects are anticipated in EIA terms*".



2.17 There are no other references to glint and glare within the LVIA, and no assessment and cross referencing of landscape and visual impacts, as was requested within the Scoping Opinion. Simply cross referencing to the Glint and Glare Assessment does not constitute being appropriately explained. There is not sufficient information or context provided on the effects of glint and glare in relation to how this could impact on landscape and visual receptors.

2.18 As a result of the above, it is considered the LVIA is not consistent with the requirements that were set out within the Scoping Opinion, and specifically, that visual impacts and impacts as a result of glint and/or glare have not been robustly assessed.

As part of the methodology, has the terminology been clearly defined, have the criteria to form judgements including thresholds been clearly defined and have any deviations from good practice guidance (such as GLVIA3) been clearly explained?

2.19 The terminology used within the LVIA has been clearly defined within the Assessment Approach section (Section 2.2 Paras 2.2.1 to 2.2.21). Thresholds and criteria are set out for Value of Landscape Elements and Character, Susceptibility of Landscape Elements and Character, Magnitude of Change on Landscape Elements, Magnitude of Change on Landscape Character, Value of View, Visual Receptor Susceptibility and Magnitude of Change on Visual Receptors.

2.20 A matrix is provided to determine the sensitivity of landscape and visual receptors, as a combination of value and susceptibility judgements. Notwithstanding the fact that a matrix-based approach to determining the sensitivity of receptors is advised against within GLVIA3⁴, there is no definition for each of the levels of sensitivity contained within the matrix, so the reader has no real sense of what these overall judgements actually mean, other than as a summation of the judgements made for value and susceptibility.

2.21 Similarly, a matrix is also provided to determine the significance of effects, as a combination of the sensitivity of the receptor and the magnitude of change. Again, notwithstanding the fact that a matrix-based approach is advised against within GLVIA3, there is no definition provided for each of the levels of significance contained within the matrix.

2.22 At Para 3.35 of GLVIA, it states that:

“In reporting on the significance of the identified effects, the main aim should be to draw out the key issues and ensure that the significance of the effects and the scope for reducing any negative / adverse effects are properly understood by the public and the competent authority before it makes its decision. This requires clear and accessible explanations; The potential pitfalls are:

- *Over-reliance on matrices or tabular summaries of effects which may not be accompanied by clear narrative descriptions;*
- *Failure to distinguish between the significant effects that are likely to influence the eventual decision and those of lesser concern;*
- *Losing sight of the most glaringly obvious significant effects because of the complexity of the assessment.”*

2.23 In failing to provide a comprehensive narrative relating to the overall judgements on the significance effects that have been made within the LVIA, it is considered that there is the potential for an over-reliance on matrices to summarise the effects, and that clear and accessible explanations have not been provided.

2.24 At Para 2.2.5 of the LVIA, it states that the effects on landscape elements are limited to within the site only. Whilst it is accepted that there would not be any direct impacts on landscape elements specifically beyond the site as a result of the proposals, there would be effects on the character of the wider landscape beyond the site (i.e. its sense of place, perceived function, its tranquillity and the degree to which it is ‘unspoilt’) because the site plays a role as part of the countryside. There would also be indirect effects on the landscape beyond the site.

⁴ At Para 3.36 of GLVIA3 it states that “Tables and matrices should be used to support and summarise descriptive text, not to replace it”



- 2.25 A **direct effect** is an effect that is directly attributable to the proposed development. **Indirect effects** result indirectly from the proposed project, as a consequence of the direct effects, often occurring away from the site, or as a result of a sequence of interrelationships or as a result of a complex pathway. They may be separated in distance or in time from the source of the effects.
- 2.26 The LVIA has understated the direct effects on the wider landscape character areas (including the Severn and Avon Vales NCA and the numerous local landscape character areas, types and units that cover the site and surrounding study area) and it does not contain an assessment of any indirect effects at all.
- 2.27 It is incorrect to state that the proposed development would be separated from the wider countryside by the existing framework of site boundary hedgerows as the applicants LVIA states (Appendix 2.1 of the ES), as it is this very landscape structure that contributes to the site forming a seamless part of the wider landscape. The site's rising landform up to Roundhill Wood makes it one of the more sensitive parts of the local landscape, which has regularly occurring wooded hills and ridges, as these are features of the local landscape that the eye is drawn to when seen from a distance and from higher ground such as when viewed from any of the numerous public rights of way that cross the surrounding countryside.
- 2.28 It is also incorrect to state that the proposals "*would fit entirely within the existing field boundary vegetation and the key characteristics of the NCA106 Severn and Avon Vales would remain and prevail*" (Appendix 2.1 of the ES). Containing a development within a sites boundary vegetation does not amount to a development 'fitting' into the receiving landscape. Aspects such as land use, perception, the integrity of the wider landscape, scenic views and an overall assessment of how the changes will later the overall fabric of the landscape is necessary and this has not been undertaken within the LVIA. Development of the scale and nature proposed is clearly not typical of the part of the NCA within the study area defined within the LVIA and the LVIA provides no evidence to the contrary.
- 2.29 In terms of indirect effects, in the case of this site these would be likely to arise as a result of:
- changes to the overall character of the surrounding landscape to contain industrial elements where it currently does not, and to contain development of a scale that is not seen anywhere in the vicinity;
 - changes in the fabric and historic time-depth of the landscape from predominantly agricultural with scattered development clustered around historic development locations, to one which contains a completely modern feature, readily visible from long distance elevated locations, and totally at odds with the historic time-depth and natural changes that have occurred within this landscape over time;
 - diminished prominence of Roundhill Wood as a historic landmark landscape feature due to it being surrounded by the solar array and the scale of the solar farm proposed relative to the scale of the woodland; and
 - Alterations to the perception of the landscape for users of the recreational routes within the wider landscape surrounding the site.
- 2.30 At Para 2.2.11 the LVIA states that "*the assessment of effects on landscape character considers how the introduction of new landscape elements physically alters the landform, landcover, landscape pattern and perceptual attributes of the site or how the visibility of the proposals changes how the landscape character is perceived*". This statement is not correct – in the case of this application for a new solar farm, the assessment of effects derives from the introduction of built elements as well as new landscape elements. Given that the built elements do appear to have been considered within the LVIA later on within the Chapter, it is assumed that this is a technical error/omission within the methodology text rather than a technical error in how the LVIA has actually been carried out.
- 2.31 That same statement also raises concern over the effects being limited to changes to the site only, whereas when assessing landscape character effects, the sequential experiences of users, effects on the overall fabric and pattern of the wider landscape and the effects the development will have on the wider network of green infrastructure, vegetation, habitats, land use and interpretation of the landscape should also be taken into account, which extends beyond the site itself.



2.32 The LVIA states at Paragraph 2.3.42 that a full Box 5.1 analysis of landscape value has not been undertaken. As set out previously, without an assessment of landscape value following either the aspects described within Box 5.1 of GLVIA3 and/or the more recent aspects of value detailed within the Landscape Institute's TGN 02/21, the LVIA cannot be considered robust or comprehensive.

2.33 It is also incorrect to state that how the landscape character is perceived is based on visibility of the proposals alone – landscape perception also relates to tranquillity, wildness, dark skies, the presence of wildlife, remoteness and seclusion, none of which is touched upon within the LVIA. There is detail and examples of how the perceptual value of landscape can be determined within the LI's TGN on assessing landscape value but this is not referred to, which suggests the methodology within the LVIA is out of date.

2.34 At para 2.2.12, the LVIA states that *“The effects on visual amenities consider the changes in views arising from the proposals in relation to visual receptors identified at settlements; residential properties; transport routes; recreational facilities and attractions; and representative viewpoints or specific locations within the study area as agreed with the Local Planning Authority.”* This list does not include recreational routes or public rights of way which is an error as public rights of way are one of the most highly sensitive user groups, due to being the most susceptible to change when considering visual impacts, as users are often following such routes with the main purpose of experiencing and enjoying the landscape⁵. In addition, the site is both crossed by Public Rights of Way and surrounded by numerous Public Rights of Way in the wider landscape, so for this application in particular, the potential effects on Public Rights of Way should have been a key part of the assessment.

Does the assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?

2.35 The LVIA does consider landscape and visual effects separately.

2.36 Landscape effects are considered at Paras 2.3.54 to 2.3.63 (this sections appears to be a summary of landscape character effects within the landscape baseline section of the LVIA) as well as at Paras 2.4.6 to 2.4.9 (construction effects) and Paras 2.4.20 to 2.4.25 (operational effects). The Landscape Character effects are also detailed within Appendix 2.1.

2.37 Visual effects are considered at Paras 2.4.10 to 2.4.17 (construction effects) and Paras 2.4.26 to 2.4.33 (operational effects). The visual effects on the viewpoints identified within the assessment are also set out in detail within Appendix 2.2.

Does the assessment demonstrate comprehensive identification of receptors and of all likely effects?

2.38 The assessment does not comprehensively identify receptors of all likely effects. The main omission is the failure to identify the elevated, and panoramic views experienced from the Millennium Way to the east of Morton Underhill. As such, the effect of the development on these views appears to have been left out.

2.39 The assessment does identify that there are a number of Public Rights of Way crossing the site, but these have not been assessed anywhere within the LVIA. The only indication of any assessment of the effects on the users of these routes is the assessment narrative that is contained within Appendix 2.2 in relation to viewpoints 2, 3, 7, 14, 20 and 21.

2.40 The failure to include these highly sensitive receptors is a glaring oversight for the LVIA, especially as these users are the ones that would be likely to experience the greatest adverse effects of all of the users identified.

2.41 The findings of the assessment are set out with narrative summaries, supplemented by an appendix for the landscape assessment (Appendix 2.1) and an appendix for the visual assessment (Appendix 2.2). Appendix 2.2 only provides detailed assessment narrative in relation to the viewpoints, not the users assessed, which means there are definite gaps in the assessment as the representative viewpoints do not cover all users

⁵ Paragraph 6.33 of GLVIA3 states that people who are engaged in outdoor recreational, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views.



likely to be affected by the development. This means that all receptors and effects have not been identified within the LVIA.

Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?

- 2.42 The LVIA does display a degree of clarity and transparency, but there is a noticeable lack of detail throughout in how the findings have been arrived at. More narrative is needed to substantiate the assessment of landscape value, landscape susceptibility and landscape sensitivity in particular.

Checking the Baseline, Context and Findings of the Assessment

What is the reviewer's opinion of the scope, content and appropriateness (detail, geographic extent) of both the landscape and the visual baseline studies which form the basis for the assessment of effects (supported by appropriate graphic such as ZTVs etc as appropriate)?

- 2.43 The baseline set out within the LVIA is relatively clear. The supporting graphics are lacking in places; in particular, Figure 2.3 is titled a Landscape Features Plan, but it is no more than a site boundary overlaid onto an aerial photography base map. There are no landscape features identified. It would have been useful to illustrate the landscape elements and features described within the LVIA on this plan.
- 2.44 The Viewpoint Location Plan (Figure 2.4) shows locations of the viewpoints but does not include directional arrows to indicate where the views are facing, and it would have been useful for these locations to have been set out on top of the ZTV and also to show the Public Rights of Way on this plan, so that the reader can see that the viewpoints are representative of a range of users and locations within the area where visibility of the proposals has been deemed possible.
- 2.45 The landscape baseline study is missing an element of analysis – the published character areas that the site is identified within are described in detail, but there is no analysis of how the site sits within this context; such as how representative the site is of the wider National Character Area, Regional Character Area of local level character types. This analysis is an important component of the baseline to ensure that the role the landscape of the site plays within the wider landscape is understood and appreciated, which in turn can influence not only the type of mitigation and design response that would be appropriate, but also, whether development of the nature proposed would be feasible and appropriate for the receiving landscape at all. Without this analysis, the reader has no means of appreciating how vital or not the landscape is as part of the wider fabric of the landscape.

Has the value of landscape and visual resources been appropriately addressed (including but not necessarily limited to) considerations of: local, regional and national designations; rarity, tranquillity, wild-land and valued landscape?

- 2.46 The value of visual resources has been appropriately addressed, but there is considerable detail lacking in relation to the LVIA's analysis of landscape value. There is no reference to the latest guidance (TGN 02/21) and no detailed analysis following Box 5.1 of GLVIA3. Without any reference to either of these best-practice guidance resources, the LVIA cannot be considered to have robustly assessed landscape value.

Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change been clearly and objectively defined, avoiding scales which may distort reported results?

- 2.47 Tables and matrices are set out within the methodology which clearly and objectively define the levels of magnitude of change and sensitivity. The matrices could distort results however, and usually a caveat would be included to inform the reader that the matrices are only to be used as a guide, with the narrative provided within the LVIA providing the ultimate assessment of the level of change and sensitivity. No such caveat is provided and therefore it is assumed that the matrices set out within the methodology are fixed and not to be deviated from within the LVIA.
- 2.48 The table and matrix for the levels of sensitivity set out within the methodology is not accompanied by a description of the levels of sensitivity in terms of how they apply to the landscape and visual resources.



Similarly, the table and matrix for the levels of significance of effect set out within the methodology is not accompanied by a description of the levels of significance in terms of what they mean for the receptors and elements identified.

How well is the cross-over with other topics, such as heritage or ecology, addressed?

- 2.49 Some cross-over with heritage and ecology is referred to, in relation to the nearby listed buildings and the mitigation that has been incorporated into the proposals. Cross-over with glint and glare and night time lighting is also referred to within the LVIA.
- 2.50 It is considered that cross-over with ecology has been addressed adequately but in relation to heritage, there is no reference to how the historic appreciation of the landscape factors into the value of the landscape. TGN 02/21 identifies that notable people, events and the arts can be connected to the landscape and as such associations with well-known literature, art, the media and music can contribute to the perception of the landscape. There is a link to Tolkien within the study area as Dormston Manor is where his Aunt once resided and Tolkien is known to have spent summers there. This is expressly acknowledged by the Council's Conservation Officer in her response to the screening application (W/22/01154/SCR) on 22 June 2022 in which she states, "*This area is strongly connected with JRR Tolkien as he would visit and stay in Bagend Farm (now Dormston Manor) and would have walked these very footpaths.*" Historic references have not been incorporated into the analysis of landscape value, which is an error that affects the subsequent judgements made within the LVIA. This should be rectified. The fact that Tolkien would have walked the footpaths within the site, and those within the wider public rights of way network surrounding the site increases the value of the landscape significantly, and the value of the footpaths themselves.
- 2.51 The Scoping Opinion requested that glint and glare visual and landscape impacts should be appropriately cross-referenced and explained in the Landscape and Visual Impact section of the ES. The LVIA does make reference to the findings of the Glint and Glare Assessment submitted as part of the Application, but only in so much as to cover off that any glint and/or glare has been mitigated through the soft landscaping proposed within the scheme. There is no reference within the LVIA or the Glint and Glare Assessment that sets out that the proposed mitigation will reduce or restrict and glint and/or glare.
- 2.52 The Glint and Glare Assessment only assesses the proposed development with mitigation in place, and not without, and it is not comprehensive in its inclusion of receptors as it does not consider the effects of glint and glare on users of local public rights of way. Without mitigation, it would be possible for glint and/or glare to impact users of the public footpaths crossing the site, and within the surrounding landscape, but this is not mentioned, or assessed within either the Glint and Glare Assessment or the LVIA.
- 2.53 The LVIA states at Paragraph 2.5.17 that "*Glint and Glare was scoped out of the ES as confirmed in the Scoping Opinion...and therefore no significant effects are anticipated in EIA terms*". There are no other references to glint and glare within the LVIA, and no assessment and cross referencing of landscape and visual impacts, as was requested within the Scoping Opinion.

Is there evidence of an iterative assessment-design process?

- 2.54 There are references within the LVIA of design changes that have been made throughout the design process. At Para 2.5.4 the LVIA states that "*Generally, the Proposed Development will seek to retain and enhance existing landscape elements that make a positive contribution to the local landscape character and will incorporate opportunities to enhance the landscape features of the Application Site*". These opportunities are not explicitly listed, but the mitigation measures set out at Para 2.5.5 do include measures to limit the impacts of the development on the local landscape. There is no list setting out how visual impacts have been mitigated.

Is it clear how the methodology was applied in the assessment, e.g.: consistent process, use of terms, clarity in reaching judgements and transparency of decision-making?

- 2.55 The methodology is referred to throughout, but detailed analysis, substantiation, evidence and justification for the findings is lacking throughout the assessment, as has been identified within this Review. In particular, with regards to the conclusions on landscape sensitivity and the level of effects on landscape



and visual receptors, there is little to no explanation of why the resulting sensitivity level or level of effect has been reached. More substantiation is required, without which the LVIA is not considered to be robust.

How appropriate are the viewpoints that have been used?

- 2.56 The LVIA provides a list and a plan showing viewpoints (Figure 2.4). Failing to consider the inclusion of at least one viewpoint from the elevated section of the Millennium Way to the east of Morton Underhill is a significant gap within the LVIA. It is one of the only locations from which the site can be seen as a whole within the context of the wider landscape, and being a long distance walking route, the visual receptors using this route are highly sensitive. The route itself is flanked by hedgerow vegetation but where gaps exist, users have the opportunity to stop and take in views westwards across the landscape. Roundhill Woods forms one of the ridgeline clumps of woodland within the view, as is described within published landscape documentation as being typical of the area. Views are unspoilt, consisting of rolling farmland, sporadic farmsteads (some of which are notably historic in appearance and form), blocks of woodland and an intact pattern of hedgerows and hedgerow trees. Gaps within hedgerow vegetation and field enlargement are visible not only within the site but within the wider landscape too.
- 2.57 It is considered that in failing to consider this viewpoint location, the LVIA has not fully grasped the full landscape and visual context of the site, as views from this location clearly demonstrate that the site has a function in providing an element of coherency within the landscape, and that the scale of the proposals is vast and out of scale in comparison to other elements (both built and natural) within the locality.
- 2.58 The viewpoints were obtained during winter and summer months, with viewpoints 1 to 21 taken in February 2022 with deciduous vegetation visibly evidenced as not being in leaf, and viewpoint 22 taken in July when deciduous vegetation is visibly in full leaf. Based on this, worst-case visibility of the site has been captured and illustrated for the most-part, however the LVIA has failed to include viewpoints from elevated footpath routes to the east of Morton Underhill, which is a sensitive location offering open views of the site. Capturing and including this view within the LVIA would have ensured that worst-case visibility of the site was captured.
- 2.59 It is the opinion of Annabelle Langhorn that the viewpoints included within the LVIA are not representative of the key locations within the surrounding landscape, with long-distance views from the Millennium Way and the elevated Public Rights of Way to the east of Morton Underhill a notable omission. A full visual survey of the potential locations from which the site could be visible has not been undertaken by Annabelle Langhorn, however given the failure to consider such an obvious viewpoint within the LVIA, it is highly likely that other key locations will have been missed, in particular those from elevated footpath routes within which Roundhill Wood forms a notable component of existing views. These include locations such as the footpaths off Berrowhill Lane to the north of the site, which are included within the applicants ZTV area but have not been assessed.

How appropriate is the proposed mitigation, both measures incorporated into the scheme design and those identified to mitigate further the effects of the scheme, and mechanisms for delivering the mitigation?

- 2.60 The mitigation identified within the scheme is focused on screening the development visually. This indicates that the assessor is aware that the proposals would not be visually consistent with the wider landscape and as such there is a need for the solar farm to be hidden. Such a degree of visual screening is not characteristic of the local landscape. Woodland is indeed present, but this tends to be located on ridges and elevated areas of land, and there is little consideration of the fact that the proposed visual screening would negatively impact users of the public rights of way crossing the site through a significant foreshortening of views as well as the creation of enclosed spaces within a landscape where such enclosure is not usual or typical. The applicant proposes the management of the existing hedgerows to allow them to reach a height of at least 4-5m. This will likely result in a permanent change to the landscape that creates a sense of enclosure in an otherwise open setting with long views for users of the public rights of way.
- 2.61 There has not been any consideration of how the development would appear within the landscape at longer distances, and in particular whether the orientation of the solar array will be at odds with the surrounding landscape elements.



What is the reviewer's opinion of the consistency and objectivity in application of the criteria and thresholds set out in the methodology for assessing the sensitivity of receptors, the magnitude of changes arising from the project, the degree/nature of effects, and the approach to judging the significance of the effects identified, in the case of ELA projects?

- 2.62 The overall conclusions made with regard to landscape effects cannot be relied upon as the value of the landscape has not been adequately and robustly assessed, and there is insufficient justification relating to the resulting conclusions that have been reached by the applicant.
- 2.63 The overall conclusions made with regard to visual effects also cannot be relied upon as the LVIA has failed to include an assessment of the effects on users of the Public Rights of Way crossing the site, and on the users of the sections of the Millennium Way and other elevated Public Footpath routes to the north-east of the site where long-distance and expansive views over the landscape are available. This is a fundamental omission.
- 2.64 The construction and decommissioning phases of the development are not addressed in much detail within the assessment (further detail set out at 2.56 below), and there are no visual receptors at all identified for the cable route.
- 2.65 Visual effects have been assessed for specific viewpoints, but not for all likely receptors. These are two separate aspects. The viewpoint photography is used to give the reader an impression of the overall visual context of the site and the likely locations from which the development could be seen. It can also support the assessment of impacts and effects on users, through showing what the baseline view is from a specific point within the landscape. But, unless every single view from every single visual receptor is captured, only assessing the impacts on viewpoints is missing a fundamental part of the landscape and visual process. The LVIA should have assessed the impacts and effects on all likely visual receptors, including the users of public rights of way (which have been omitted), with additional narrative included on impacts on the specific viewpoints if desired. To only assess the impacts on the viewpoints, which have also been reviewed and are not considered comprehensive or fully representative, results in a visual impact assessment that is not complete, not robust, and does not identify all possible significant effects.

What is the opinion on the volume, relevance and completeness of the information provided about the development or project including, where relevant, detail about various development stages such as construction, operation, decommissioning, restoration, etc.?

- 2.66 The LVIA refers to the development proposed, the construction stages and the decommission in general terms. There is no detail relating to phases of development, the potential timing of construction, what activities will take place at what times of year, or how the site will function in terms of vehicle movements and panel movements once operational.
- 2.67 The proposed development is for a large-scale solar PV development. The details of how the development will be constructed and exactly what it will consist of once operational are underplayed within the ES and within the LVIA Chapter
- 2.68 The ES states that the solar panels will be mounted on a grid, which will be pile driven into the ground. The disturbance associated within this on the landscape, on the integrity of the structure of the ground, and on views is not referenced within the LVIA.
- 2.69 It is understood the solar panels will be 'tracker panels' which means they will move to align with the direction of the sun to ensure maximum solar energy can be obtained. This is not referred to within the LVIA, and any need to consider the effects at different times of the year to capture the variations in when glint and/or glare could potentially be more or less noticeable has not been given any consideration. For LVIA, winter months are usually deemed to represent the worst-case scenario as deciduous vegetation will not be in leaf and intervisibility will be greatest. However, in relation to glint and/or glare the summer months could result in the worst-case scenario when sunlight and any potential glint or glare from the panels could be most visible.



- 2.70 The construction of the development will involve vehicle movements to and from the site, the implementation of security fencing, the siting of construction compounds, vehicle entrance points and other works beyond the site boundary. There is no discussion of this within the LVIA, nor is there any discussion regarding the effects during construction of the cable route on the visual receptors.
- 2.71 Once operational, there will be a number of battery storage stations, inverters and substations, which will be surrounded by 3m high acoustic fencing where necessary. These do not appear to have been assessed within the LVIA and this is a notable omission. Fencing is not a typical feature of the local landscape, especially not acoustic fencing. One of the guidelines for the Wooded Estatelands Landscape Type (which covers the majority of the site) is to seek to remove and replace fencing and other uncharacteristic boundary treatments with hedgerows. The proposal to surround the solar array parcels with timber post and wire fencing is in direct conflict with this character guideline, as is the proposal to surround the various battery storage and inverter stations with acoustic fencing (which is proposed to be close-boarded timber fencing and visually impermeable). This acoustic fencing is not clearly marked on the proposals plans and does not appear to have been screened with soft landscaping.
- 2.72 Detailed information is lacking in relation to the restoration of the site following decommission, and the restoration of the cable route following construction.
- 2.73 Overall, there is a considerable lack of detail in relation to how the development will be installed and implemented, the timings of such and what this will result in on the locality. Whether the construction and/or decommissioning periods will introduce new receptors specific to these phases of the development has also not been considered within the LVIA. Given the location and length of the cable route alone, it is likely that there would be numerous additional visual receptors for the construction period.

Does the document clearly identify landscape and visual effects which need to be considered in the assessment?

- 2.74 The LVIA describes the effects on landscape resources, but there are significant gaps in the assessment of landscape value, landscape character effects, and in the appropriateness of the mitigation proposed, which in turn affects the overall judgement on the effects.
- 2.75 An assessment of visual effects is completely missing for the Public Right of Way users crossing the site and for the elevated views from the Millennium Way and other public rights of way to the east of Morton Underhill. Therefore, a full analysis of the visual context of the site and the visual effects has not been included within the LVIA.

Have levels of effect been clearly defined and, in the case of LVIA, have thresholds for significance been clearly defined and have cumulative landscape and visual effects been addressed?

- 2.76 Levels of effect and thresholds for significance have been defined within the methodology and assessed within the LVIA, but the definition for each level of effect is not defined.
- 2.77 Cumulative landscape and visual effects have not been considered within the assessment. This is in accordance with the Scoping Opinion which did not identify any other development with which effects should be assessed. From a desktop review no additional cumulative schemes were identified and this statement seems valid.

Checking the presentation of the assessment findings

Does the LVIA/ LVA display transparency, objectivity and clarity of thinking, appropriate and proportionate communication of all aspects of the assessment of landscape and visual effects, including cumulative effects?

- 2.78 The references to the methodology within the assessment do provide some clarity. However, the lack of completeness within the baseline assessment in relation to landscape character and viewpoint locations, and the visual assessment failing to include impacts on the users of the Public Rights of Way crossing the site and the full extent of the Millennium Way means there is a lack of transparency overall on the effects.



- 2.79 The provision of a clear analysis of all the landscape characteristics and views likely to be affected by a development is fundamental to providing a comprehensive and fair assessment of landscape and visual impacts. This may include where there will be no change, or minimal impacts, as well as where there may be an extensive number of high impacts. Similarly, some changes may affect parts of a long walking route and not others. Changes may result in beneficial effects, or there may be nuances at a local level whereby localised change may be beneficial even if it is not noticeable in association with the wider landscape receptor or view. The LVIA does not provide such a comprehensive review and focuses only on those elements that will change within the landscape, without considering the indirect, perceptual and wider context of the changes to the landscape.
- 2.80 Similarly, a focus on visually screening the development has been taken without much justification as to how this would sit within the wider landscape, how well the development would be assimilated or not, and how this would alter the wider fabric of the landscape both in terms of the elements that will be created and changes, as well as how it will be perceived. There is little to no discussion of the scale of the proposed development, which is far greater than any built or natural elements within the receiving landscape.
- 2.81 Without the backing of a thorough baseline analysis and landscape and visual assessment on which to base the LVIA, the reader cannot fully grasp all of the issues at play and cannot understand how the likely impact will be experienced in particular within the wider context. In essence, the full story is missing from this LVIA and whilst the individual judgments may arguably be fair and justified, the conclusions and overall transparency is fundamentally missing. In turn, there is a level of doubt as to the appropriateness of the mitigation that has been incorporated.

Have the findings of the assessment been clearly set out and are they readily understood?

- 2.82 The findings of the assessment are set out with narrative summaries, supplemented by an appendix for the landscape assessment (Appendix 2.1) and an appendix for the visual assessment (Appendix 2.2). The assessment is relatively clear, but there is not enough evidence or description to explain the reasoning behind the levels of change and effect identified, in particular with regards to the visual effects which are not fully tabulated in Appendix 2.2. Appendix 2.2 only provides detailed assessment narrative in relation to the viewpoints, not the users assessed, which means there will be definite gaps in the assessment as the representative viewpoints do not cover all users likely to be affected by the development.

Has there been clear and comprehensive communication of the assessment, in text, tables and illustrations?

- 2.83 The assessment is communicated via text, tables and some illustrations but parts of the assessment are lacking in narrative to substantiate the judgements that have been made with regards to landscape value, landscape sensitivity, representativeness of the landscape, magnitude of change on visual receptors and the effects on visual receptors.

Are the graphics and/or visualisations effective in communicating the characteristics of the receiving landscape and visual effects of the proposals at agreed representative viewpoints?

- 2.84 The representative viewpoint photography is effective in representing the agreed viewpoint locations; but the LVIA is not accompanied by any graphic material to assist in communicating the characteristics of the receiving landscape other than a plan showing what character areas the site lies within and an aerial image of the site that is not labelled or annotated.

Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards?

- 2.85 The graphics included provide some illustration of points raised within the LVIA, but there are limited graphics provided relating to the landscape elements within the study area, there are no directional arrows indicated for the viewpoints, there is no plan providing references for the numerous public rights of way crossing the site and the wider landscape, and there is no plan setting out the landscape recommendations for mitigation and enhancement that informed the development response, all of which would assist the reader in understanding the points raised throughout the LVIA.

Is there a clear and concise summation of the effects of the proposals?



2.86 A summary of the effects is provided, but as this has not included an assessment of all receptors likely to be affected, is lacking in narrative to substantiate the judgements made (in particular in relation to visual effects) it does not provide a reliable overview of the overall consideration of the landscape and visual effects that will arise as a result of the proposed development.

2.87 The LVIA has been reviewed in accordance with the best practice guidance set out in TGN 1/20 published by the Landscape Institute.

Summary of Peer Review findings

2.88 The review has identified the following:

- The methodology is not based on best-practice guidance or latest LI guidance, particularly in relation to the assessment of landscape value and landscape character effects.
- The methodology is over-reliant on matrices, with not enough narrative provided throughout to justify and explain to the reader how and why the judgements have been arrived at.
- The scoping response of the Council has not been fully taken into account, in particular with regards to the concern raised by Inkberrow Parish Council in relation to open views from elevated land to the east of Morton Underhill.
- Landscape value has not been adequately assessed.
- Visual impacts have not been comprehensively assessed.
- Mitigation is over-reliant on visual screening of the proposals with no explanation as to why and whether this would be in keeping with the wider landscape and visual context of the site.
- The consultation work has not been fully documented.
- The landscape recommendations that should be integral during the design development process have not been clearly set out.
- The scale of the site and proposals in comparison to the receiving landscape has not been assessed.

2.89 Overall, this Review considers that the LVIA to be lacking in detail, not in line with the latest best-practice guidance, and with clearly obvious gaps, which would need to be addressed before a decision can be made by the determining authority on the conclusions that have been made.



Section 3: Independent Review of the Landscape & Visual Context of the Site

Introduction

- 3.1 This section of the Review provides a summary of the professional opinion of Annabelle Langhorn CMLI with regards to the landscape and visual context of the site in relation to the findings presented within the LVIA prepared by Pegasus Group. It is not intended to form a direct comparison, or alternative opinion, but to provide a level of detail and critique to substantiate the findings of the Peer Review set out at Section 2, and to highlight potential discrepancies and outstanding queries pertaining to the likely landscape and visual effects that have been identified thus far by the Applicant.

Site Description

- 3.2 A field visit was undertaken by Annabelle Langhorn during March 2023, when deciduous vegetation was not in leaf and visibility was adequate (weather was overcast, with light rain which at times limited viewing distances). During the field visit, some of the public rights of way within the site were traversed, as well as a number of those located within the surrounding landscape, including the elevated section of the Millennium Way located to the east of Morton Underhill. Local roads were also reviewed by car and on foot.
- 3.3 The site was found to consist of a series of undulating fields, currently in arable use, surrounding the northern and eastern edges of Roundhill Wood which sits on a localised ridgeline. Fields within the site vary in size and shape; those to the north are smaller in size, and those to the east are much larger. In all cases the fields are irregular in shape, occupy undulating ground, and are defined by hedgerows with hedgerow trees. The field boundaries are gappy, and in places only remnants of former hedgerows are visible. But overall, the field pattern matches that which is illustrated on OS base mapping.
- 3.4 The site is traversed by numerous Public Rights of Way, which when on-site do not fully correspond with the routes as shown on OS mapping in terms of their exact location, and in places they are demarcated by trodden pathways and vehicle tracks across the site rather than any more formal wayfinding. Posts with directional arrows for the footpath routes are located at the edges of Roundhill Wood and with this and OS mapping it is possible to find the routes across the site.
- 3.5 Character across the site varies – where the ground levels are lower there are pockets of the site that feel more intimate, enclosed, and are influenced by the adjoining residential uses with paddocks visible, and the adjacent road and houses also visible. Other parts of the site feel more remote, especially in close proximity to Roundhill Wood where even when traversing the elevated parts of the public rights of way routes, there is a sense of remoteness and very little in the way of detracting elements within the view. Whilst on site, deer and prolific birdsong were noted, adding to the sense of remoteness and wildness of the site.
- 3.6 Having also reviewed the surrounding landscape, it is clear that the intensification of farming is a typical occurrence within this area, with a pattern of larger fields where field boundaries are gappier and less intact interspersed with areas of small field sizes where the field boundaries are more mature. The main land use within the vicinity of the site is farming with the landscape made up of agricultural land, scattered farms and clusters of dwellings, frequent blocks of woodland, mainly on ridges, and narrow country lanes. The landscape is well traversed by public rights of way, with a very high number of routes crossing the landscape within and surrounding the site. Topographically the landscape within and surrounding the site is undulating with rolling fields and woodland occupying hill crests.
- 3.7 This pattern of uses, topography and vegetation creates a varied character across the landscape within and surrounding the site, whereby there are intimate, enclosed and historic feeling areas of the landscape, where the scale is small, and other more functional, vaster areas of landscape where there is a sense of



visual openness. Overall, this is a distinctly rural landscape. Even where there are influences of adjoining settlement, the character is still rural overall away from the main settlement areas.

- 3.8 The LVIA undertaken by Pegasus does touch on the site-specific character of the landscape, but the description (contained at Paras 2.3.1 to 2.3.4) only relates to the site itself. How the site sits within the wider landscape, and how the landscape elements present come together to form part of the bigger context is missing from the LVIA. The LVIA states that the fields to the south of the site are devoid of field patterns (Para 2.3.1). This is not strictly true, as the fields to the south of the site do contain field patterns that tie in with those shown on Ordnance Survey mapping, it is just that the fields are larger in size within the southern part of the site.
- 3.9 The trees within the site and immediately surrounding it are all covered by a Tree Preservation Order, which is set out within the Arboricultural Impact Assessment. This is not included or referenced within the LVIA.

Landscape Character

- 3.10 The Published Character assessments identified within the LVIA are accurate, but the LVIA does not provide an analysis of the site within the context of these wider published assessments.
- 3.11 With regards to the National Character Assessments (NCA), the site is located within the Severn and Avon Vales NCA. Whilst the LVIA acknowledges that this covers a broad area that is of limited relevance to local scale development planning, it is still useful to note and be aware that the site and the surrounding landscape does share some characteristics with the Severn and Avon Vales NCA in that it has frequent hedgerow trees and a highly varied use of traditional building materials including black and white timber frame dwellings. The NCA description notes that woodland is sparse, but with regards to the site and the study area, woodland is quite a frequent occurrence.
- 3.12 At a regional and local level, the site is identified within numerous different Landscape Types, Landscape Description Units and Land Cover Parcels as set out within the LVIA. In terms of how representative the site itself and the surrounding study area is of these landscape types, this is not presented within the LVIA. However, as an area of rolling agricultural fields, defined by field boundary hedgerows, with frequent hedgerow trees and areas of woodland, and with settlement limited to scattered farmsteads and discrete clusters of housing, it is clear that the site and surrounding landscape is indeed characteristic.
- 3.13 The elements and features within the landscape of the site are not particularly rare in the context of the wider landscape character areas and types, but the unity of the features overall, and the distinct lack of detracting elements is worthy of recognition. There are currently no other developments of the scale or nature proposed by the planning application that is the subject of this Review.

Visual Context

- 3.14 The ZTV included with the LVIA (Figure 2.4) has been tested and verified through GIS mapping and has been found to be technically accurate.
- 3.15 The site occupies undulating ground surrounding Roundhill Wood, and which due to the composition of the surrounding landscape being topographically varied, and influenced by field boundary hedgerows, hedgerow trees, roadside vegetation and blocks of woodland, means that views towards the site are relatively limited despite the scale of the site. However, there are locations from which the site is seen in almost its entirety, from the elevated route of the Millennium Way and other Public Footpaths, to the east of Morton Underhill, where the routes follow the crest of a ridgeline. This is picked up by the ZTV contained within the LVIA but has not been picked up or assessed within the LVIA itself.
- 3.16 The views from this part of the Millennium Way and Public Footpaths are long distance, expansive and panoramic. Views consist of expansive fields, field boundary hedgerows and trees, scattered farms, winding roads and lanes, and in the distance extensive tracts of woodland with settlement nestled in



amongst the wooded areas in the distance. There is a sense of the landscape being rural and unspoilt overall. The site forms a moderately sized proportion of this overall view and appears as a series of sloping fields with Roundhill Wood as the backdrop.

- 3.17 The availability of views across the site itself from the Public Rights of Way that cross it are noteworthy, as the site performs a function in providing a sense of openness, of rural landscape uses, and of visual unity with the surrounding landscape.

Landscape Receptor Identification and Sensitivity

- 3.18 This Review considers that the value of the site has been inadequately assessed, as the assessment of value does not follow the latest LI guidance note relating to the assessment of value. This review also considers that regardless of this technical deficiency, the value of the site has been underestimated in any case within the LVIA.
- 3.19 The LVIA states that the condition of the landscape is variable which it states is confirmed by the published landscape character assessments – but this is not evidenced within the LVIA and there is no reference to the wider landscape being in variable condition within the published character assessments. The hedgerows are noted to be fragmented in localised parts of the site which can be an indicator of poor condition. However, in the case of the site, this is similar to the wider landscape where there are several enlarged fields that have stretches of hedgerow that do not necessarily all link up, and where gaps can be large in places. There are no other references within the LVIA to the landscape being in poor condition.
- 3.20 Evidence through fieldwork undertaken in association with this Review has identified that the landscape within the site and surrounding area is in fair to good condition, with components generally well maintained, and places where the landscape is maintained to a high standard. The absence of major infrastructure, traffic and detracting elements makes the site have a moderate to high level of tranquillity.
- 3.21 This would place the site at a medium to high level of landscape value if judged by the LVIA's own methodology. The LVIA deems the landscape to be of medium value. However, the lack of thorough analysis of the other factors contributing towards value including natural heritage, cultural heritage, associations, perceptual, recreational and functional, casts uncertainty as to whether the value assessment is accurate.
- 3.22 The scale of the proposals is such that the landscape would struggle to accommodate it without it being completely out of keeping with any other development in the area. Whilst there is some enclosure that could contain the proposals, the site is also extensively visible from medium-long distance viewpoint locations, and as such it would not be readily enclosed by existing landscape elements. There is no reference or existing context for the type of development proposed – solar farms are not a typical occurrence within this area, nor are any uses of a scale that could be perceived to be semi-industrial in nature. The receiving landscape also has very limited detracting elements present, and no references to major infrastructure or industry. In line with the LVIA's own methodology, this Review considers that the landscape is of high susceptibility to the development proposed, and as such, it is considered that the susceptibility of the landscape has been underestimated within the LVIA.
- 3.23 Using the LVIA's own matrix regarding sensitivity, this would place the site and the surrounding landscape as being of high sensitivity, whereas the LVIA has judged it to be medium sensitivity.

Visual Receptor Identification and Sensitivity

- 3.24 This Review considers that the visual receptors have not been comprehensively and thoroughly identified and assessed within the LVIA.
- 3.25 The Public Rights of Way within the site have been identified, but not assessed; and the locations to the north-east of the site where the Millennium Way and other Public Rights of Way are located on a ridgeline have not even been identified within the LVIA. Conversely, the LVIA states (at Para 2.3.56) that there is



very limited intervisibility with nearby fields and the surrounding landscape. This places a high level of uncertainty on the findings of the LVIA as the full context has not been assessed.

Proposed Mitigation

- 3.26 The mitigation proposed within the LVIA largely relates to the provision of new hedgerow planting to gap up the existing internal field boundaries within the site. Whilst this would be consistent with the published character assessments, at a local site-specific level, the presence of gaps within field boundary hedgerows is quite a common feature of the local landscape, and it does provide opportunities for medium and long distance views over the landscape where these gaps are. This is notable within the site itself for the Public Rights of Way that cross it, and as such, a decision to gap up all the hedgerows across the site as much as possible is not necessarily the most sensitive response to the site specific circumstances.
- 3.27 The LVIA states that biodiversity would be increase beneath the solar panels as the currently arable land would be seeded with a diverse and locally appropriate seed mix. However, the LVIA also notes that land will be grazed by sheep, so this Review would query whether that will result in a diverse sward being established, as sheep grazing would likely to keep the vegetation levels trimmed low in height. The LVIA also states this would be reflective of the mixed farming land use as per the character assessments for the Wooded Estatelands and Principal Timbered Woodland Landscape Types, but this is not substantiated and it is not clear what this is referring to.
- 3.28 At Para 2.3.55 of the LVIA it states:
- “It is important to note that from publicly accessible locations across the wider landscape where the development proposals are visible during the early years of the proposals, the semi-mature trees located within the reinstated historic field boundaries and adjacent to the on-Site PRoW would be visible above the built form. Semi-mature trees located along the external boundaries of the Site would also aid in filtering views of the proposals. These planting proposals coupled with the localised variations in topography and presence of the existing tree cover would help to screen views of the proposed development from the wider landscape, thus protecting the currently experienced aesthetic, perceptual and experiential qualities of the landscape.”*
- 3.29 This is a clear acknowledgement that a solar farm use would not be visually coherent with the wider landscape, as visual screening would not be required if it were. Indeed, the lack of any analysis of the availability of long distance views from the Millennium Way means that the effectiveness of the visual screening identified and proposed has been over-estimated. Similarly, if the local enclosure of the site is good as stated within the LVIA, this Review would query why visual screening, which is not characteristic of the wider landscape, is needed at all.
- 3.30 The proposed screen planting would alter the character of the landscape locally, making it more enclosed where currently it is most definitely open both in terms of landscape character and visually. Whilst it is acknowledged that there has been an attempt to consider the experience and amenity of the users of the Public Rights of Way that cross the site, this Review would query whether the creation of an enclosed area of public open space would be feasible, usable and safe in such an isolated location, and whether the flanking of the majority of the routes crossing the site with a hedgerow on one side and a security fence with solar arrays beyond would provide an enjoyable recreational experience for users of relatively long distance walking routes. It is also important to note that fencing is noted within the published character assessment to be uncharacteristic.

Potential Impacts and Effects

- 3.31 This Review does not aim to provide an assessment of the potential impacts and effects, as a full and alternative LVIA has not been undertaken at this stage. However, an analysis of the findings of the LVIA is presented below.
- 3.32 The LVIA has not adequately considered the scale of the proposals and how this will change the landscape not just within the site, but within the surrounding area. A large detracting element will be introduced into



what is largely perceived to be an unspoilt landscape. An entirely new land use will be introduced which the Application describes as only a limited change (Para 2.3.62) which cannot be supported.

- 3.33 The LVIA states that the development would not manifest itself in the landscape (Para 2.3.62), whereas a review of the baseline of the site and the surrounding landscape, and the field work undertaken in association with this Review has found that the development definitely would manifest itself in the landscape. The proposed mitigation itself would be conspicuous and the sense of scale to be introduced through the creation of a vast, extensive solar farm would not at all be reminiscent of the local character.
- 3.34 There is no assessment within the LVIA of how the site reflects the wider landscape character areas, types and units.
- 3.35 As mentioned already, the impacts and effects on the users of the Public Rights of Way crossing the site, and on the users of the elevated sections of the Millennium Way have not been assessed. The Millennium Way is a long distance walking route which is promoted and as such this places it at the higher end of the scale of sensitivity when considering the value, susceptibility and overall sensitivity of views.
- 3.36 At Para 2.4.2 of the LVIA the potential landscape effects that can arise from Solar PV developments are listed. These include that field-scale solar PV developments may be particularly visible in open landscapes or on upper hill slopes, that the perceived industrial character of large-scale solar PV developments could detract from the intrinsically rural character and that the regular edges of solar PV developments may be conspicuous in more irregular landscapes (particularly where they do not follow contours or where field boundaries are irregular in form). Parts of the site are on upper hill slopes, which makes them particularly visible from elevated locations to the north-east (Millennium Way). And the perception of an industrial character associated with a large-scale solar PV development within the site is completely at odds with the existing intrinsically rural character of the local landscape within and surrounding the site. This is by the LVIA's own admission. The arrays also do not seem to make any attempt to follow the contours of the site to help them blend in other than in terms of not disrupting the ground levels. The orientation of the panels does not appear to have been given any consideration in order to assist the development to blend into the landscape.
- 3.37 Visual receptors have not been identified or assessed for the cable route which would need to be addressed in order to provide a thorough and complete LVIA for an EIA as construction phase impacts are a key component requiring assessing. The construction phase is quite often the most disruptive phase of a development, so to not assess this phase in sufficient detail is an omission within the LVIA that could skew the overall findings of the significance of effects.
- 3.38 Overall, it is considered that the landscape character effects during construction have been underestimated. The fact that the local and wider landscape does not typically contain any construction sites, the presence of one would be totally at odds with the receiving landscape, resulting in adverse effects that would be more than just minor.
- 3.39 The landscape character effects during operation have also been underestimated as there is not a thorough enough analysis of how the proposals will fit within the wider landscape, and the baseline value, susceptibility and sensitivity of the landscape has been underestimated potentially skewing the subsequent assessment of impacts and effects.
- 3.40 Overall, it is considered that the visual effects during construction and during operation have not been fully assessed – there is no assessment for the cable route during construction and the Public Rights of Way crossing the site have been missed altogether. The Millennium Way and other Public Rights of Way beyond the site have also not been assessed. Although more detail is provided at Appendix 2.2 in relation to impacts on views, the description contained therein relates only to the viewpoints included within the LVIA and does not cover impacts on all of the likely visual receptors.



Section 4: Overall Conclusion

- 4.1 Overall, this Review considers that the LVIA to be lacking in detail, not in line with the latest best-practice guidance, and with clearly obvious gaps, which would need to be addressed before a decision can be made by the determining authority on the conclusions that have been made.
- 4.2 This Review considers that there are errors and omissions within the LVIA that mean the findings within it cannot be relied upon. These include:
- The methodology is not based on best-practice guidance or latest LI guidance, particularly in relation to the assessment of landscape value and landscape character effects.
 - The methodology is over-reliant on matrices, with not enough narrative provided throughout to justify and explain to the reader how and why the judgements have been arrived at.
 - The scoping response of the Council has not been fully taken into account, in particular with regards to the concern raised by Inkberrow Parish Council in relation to open views from elevated land to the east of Morton Underhill.
 - Landscape value has not been adequately assessed.
 - Visual impacts have not been comprehensively assessed.
 - Mitigation is over-reliant on visual screening of the proposals with no explanation as to why and whether this would be in keeping with the wider landscape and visual context of the site.
 - The consultation work has not been fully documented.
 - The landscape recommendations that should be integral during the design development process have not been clearly set out.
 - The scale of the site and proposals in comparison to the receiving landscape have not been assessed.
- 4.3 An independent review of the Landscape and Visual Context of the site has found in relation to the LVIA undertaken by Pegasus Group, that:
- A detailed, and comprehensive description of the character of the site and the surrounding landscape has not been provided, and therefore it is not clear whether the intrinsic character of the site has been appreciated;
 - The baseline value, susceptibility and sensitivity of the landscape has been underestimated potentially skewing the subsequent assessment of impacts and effects.
 - The visual receptors identified are not comprehensive with key viewpoints from sensitive locations missing;
 - The mitigation proposed is not appropriate for the receiving landscape;
 - The mitigation proposed is not appropriate for the receiving visual context;
 - The beneficial effects of the proposed development on the landscape elements within the site have been over-estimated;
 - The visual receptors have not been identified or assessed for the cable route;
 - The landscape character effects during construction have been underestimated and there is not enough detail in the assessment of the cable route;
 - The landscape character effects during operation have been underestimated; and
 - The visual effects during construction and during operation have not been fully assessed – there are key visual receptors missing.



4.4 In Conclusion, the LVIA prepared by Pegasus Group in association with the application for a new solar PV development at Land east of Stock Green, Wychavon cannot be relied upon. Furthermore, the overview of the landscape and visual context of the site and surrounding landscape and views undertaken by Annabelle Langhorn CMLI has determined that the site would not be an appropriate location for the proposed solar PV development as there is a high level of uncertainty that suitable mitigation and enhancement measures could overcome the likely impacts and effects on sensitive landscape and visual receptors.