LANDSCAPE AND VISUAL REVIEW

OF THE DEVELOPMENT CONSENT ORDER (DCO) APPLICATION

FOR THE SPRINGWELL SOLAR PROJECT

FOR

LINCOLNSHIRE COUNTY COUNCIL

&

NORTH KESTEVEN DISTRICT COUNCIL

May 2025

Landscape and Visual Review

Quality Assurance – Approval Status

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Landscape and Visual Review

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Appendices:

Appendix A: Previous AAH Consultation documents:

- AAH TM01 Landscape and Visual Scoping Opinion 14th April 2023
- AAH TM02 Initial Viewpoint Comments 29th June 2023
- AAH TM03 Viewpoint Comments 15th August 2023
- AAH TM04 PIER Comments 19th February 2024
- AAH TM05 Viewpoint Comments 10th July 2024

Appendix B: Landscape Institute Technical Guidance Note 1/20 (10 Jan 2020)
: *Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs).*

1.0 Introduction

Purpose of the Landscape and Visual Review

1.1 AAH Consultants (**AAH**) has been commissioned to prepare a review of the Landscape and Visual elements of the Development Consent Order (**DCO**) Application for the Springwell Solar Project (the '**Development'**), submitted to the Planning Inspectorate in November 2024 and accepted for Examination in December 2024, on behalf of Lincolnshire County Council (**LCC**) and North Kesteven District Council (**NKDC**). This follows on from AAH providing landscape and visual consultation with the applicant on behalf of LCC and NKDC at the Pre-Application stage of the project. AAH pre-application correspondence (in the format of Technical Memos) is provided within **Appendix A**.

1.2 The purpose of this report is to carry out an independent review of the landscape and visual elements of the DCO submission, with a focus on a review of the Landscape and Visual Impact Assessment (**LVIA**) chapter of the Environmental Statement (**ES**), which is based on the guidance provided within the Landscape Institute *Technical Guidance Note 1/20 (10 Jan 2020): Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)*, which is included within **Appendix B** for reference.

1.3 This report will be utilised to inform and guide LCC and NKDC input into further stages of work through the Examination of the application, which is for a Nationally Significant Infrastructure Project (**NSIP**). This will include input into Local Impact Reports (**LIR**) and Statements of Common Ground (**SoCG**), as well as formal requests for information or responses to examiners questions that may be required through the Examination or at any associated hearings.

About AAH Planning Consultants and The Author

1.4 AAH Consultants comprises professional and accredited individuals. Our consultants are Chartered Members of the Landscape Institute (**CMLI**) and the Royal Town Planning Institute (**RTPI**).

1.5 This review has been prepared by [redacted], who is a Chartered Landscape Architect within AAH with over 20 years' experience in landscape design and assessment, and

considerable experience in landscape and visual matters associated with solar NSIP and associated DCO Applications.

Relevant Documents

1.6 The Landscape and Visual review is based on the following documents (including sub-appendices) submitted to the Planning Inspectorate, which are available at: https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010149/documents

Information downloaded and initially reviewed is as follows (which include any associated sub-appendices):

- **3.1 Draft Development Consent Order**

- **Plans / Drawings / Sections**
  - 2.1 Location, Order Limits Grid Coordinate Plans
  - 2.3 Work Plans
  - 2.5 Illustrative Layout Plans and Sections

- **Environmental Statement Volume 1**
  - 6.1 Environmental Statement Volume 1 Chapter 00: Glossary
  - 6.1 Environmental Statement Volume 1 Chapter 1: Background and Context
  - 6.1 Environmental Statement Volume 1 Chapter 2: Location of the Proposed Development
  - 6.1 Environmental Statement Volume 1 Chapter 3: Proposed Development Description
  - 6.1 Environmental Statement Volume 1 Chapter 4: Reasonable Alternative Considered
  - 6.1 Environmental Statement Volume 1 Chapter 5: Approach to the EIA
  - 6.1 Environmental Statement Volume 1 Chapter 10: Landscape and Visual
  - 6.1 Environmental Statement Volume 1 Chapter 16: Cumulative Effects
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- **Environmental Statement Volume 2**
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- **Environmental Statement Volume 3**
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- **Environmental Statement Volume 4**
  - 6.4 Environmental Statement Volume 4 Landscape Visualisations Part 1
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  - 6.5 Environmental Statement Volume 5 Non-Technical Summary

- **Other Documents**
  - 7.2 Planning Statement
  - 7.3 Design Approach Document
  - 7.4 Design Commitments
  - 7.7 Outline Construction Environmental Management Plan
  - 7.9 Outline Landscape and Ecology Management Plan
  - 7.10 Outline Operational Environmental Management Plan
  - 7.11 Outline Soil Management Plan

Please note: this review is of the information available at the time of writing. Throughout the pre-examination and examination process additional information will be submitted, including updates and amendments to some of the documents listed above.

Previous Consultation

1.7 As part of the DCO process, as stipulated by *The Planning Act 2008* (**PA2008***)*, AAH have carried out pre-application landscape and visual consultation with the applicant and relevant members of their design team, on behalf of LCC, and NKDC over approximately a 12-month period. This has included discussion and consultation on:

- Expectations of the LVIA, including content and reflection of current best practice and guidance
- LVIA Methodology;
- ZTV parameters;

- Study Area extents (distance);
- Viewpoint quantity and locations;
- Accurate Visual Representations (**AVR**s), including the quantity and location, as well as type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative landscape and visual effects, including identification of sites/projects; and
- Residential Visual Amenity Assessment (**RVAA**) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

1.8 Section 10.3 and Table 10.1 of the LVIA summarises relevant consultation carried out, and for landscape and visual matters, AAH have subsequently issued five Technical Memos (**AAH TMs**) summarising comments and consultation through the Pre-application period, including a focus on proposed viewpoints, and review of the Preliminary Environmental Information Report (**PEIR**). For reference, the AAH Technical Memos from the Pre-Application stage are included within **Appendix A**.

2.0 Presentation of the LVIA

The following section provides a review of the presentation of the LVIA, based on the following criteria (where applicable):

- *Is the LVIA appropriate and in proportion to the scale and nature of the proposed development;*
- *Are findings of the assessment clearly set out and readily understood;*
- *Is there clear and comprehensive communication of the assessment, in text, tables and illustrations;*
- *Are the graphics fit for purpose and compliant with other relevant guidance and standards; and*
- *Are landscape and visual effects considered separately;*
- *Are receptors and all likely effects comprehensively identified;*
- *Does the LVIA display clarity and transparency in its reasoning, the basis for its findings and conclusions; and*
- *Is there a clear and concise summation of the effects of the proposals.*

LVIA Chapter

2.1 The LVIA and associated figures, appendices and documents provide a thorough analysis of landscape and visual effects of the Development, and the level of information and detail is appropriate for the scale and type of development. The assessment is detailed and laid out in a logical manner, and the process of assessment is thorough and well explained. It has been carried out to best practice and guidance, primarily the *Guidelines for Landscape and Visual Impact Assessment (GLVIA3)* by the *Landscape Institute*, by a team of competent Chartered Landscape Architects.

2.2 The LVIA clearly draws a distinction between **landscape effects** and **visual effects**, with the main chapter focussing on likely **'significant'** effects. Paragraph 1.7.2 of Appendix 10.1

clarifies *major* or major/*moderate* effects generally being considered **'significant'**. Paragraph 1.7.3 of Appendix 10.1 clarifies *moderate/minor, minor, minor/negligible* or *negligible* significance are considered to be not significant. Paragraph 1.7.4 clarifies professional judgement is applied in regards to *moderate* effects being significant, or not. This is aligned with standard practice and is typical for LVIAs, however we would generally assume *moderate* effects would be considered significant, and the author would justify as to the reasoning as to why any moderate effects would be considered not significant.

2.3 The LVIA presents an assessment of a 'worst case' scenario of the Development, based on design parameters presented in ES *Chapter 3: Proposed Development Description*. Section 3.2 goes on to describe the project parameters that the LVIA have assessed, and clarifies in para. 3.2.6. that *"the Applicant intends to use the 'Rochdale Envelope' approach to assessing the impacts of the Proposed Development within the maximum parameters set out in this ES".* Paragraph 10.4.7 of the LVIA clarifies that the assessment of landscape and visual effects has assumed the worst-case scenario in regards to assessing the maximum parameters, with Table 10.4 laying out the reasonable 'worst case' scenarios for each project element. This includes an assumption that all vegetation proposed to be removed on the *Vegetation Removal Parameters* drawings would be removed. However, if proposed mitigation areas and existing retained vegetation proposals are changed in later, detailed design stages, the findings of the LVIA are likely to also change. Landscape mitigation, and vegetation retention and protection, needs to be clarified and guaranteed as the assessment relies heavily upon it to mitigate the effects of the Development.

2.4 The LVIA assesses landscape and visual effects at the main phases: **construction; operation** and **decommissioning**, with operation phase considered with and without mitigation (year 1 effects and year 10 effects). The main phases are detailed within the section of *Chapter 5* on Assessment Scenarios (Paragraph 5.7.18). The LVIA considers the scheme in isolation, and *Chapter 16* of the ES (from paragraph 16.6.11 to 16.6.45) considers the scheme **cumulatively** with similar type and scale schemes in the local area (notably the National Grid Navenby Substation scheme, proposed within the northern part of the DCO order limits for Springwell). Although these are schemes in close proximity, and cumulative landscape and visual effects at a wider character area are not fully considered.

LVIA Appendices

2.5 The Appendices produced as part of the LVIA provide very detailed supporting information relating to the assessment. The appendices are clearly laid out and easy to follow and locate pertinent detailed information relating to the main chapter. The appendices are listed within section 10.1.3 of the LVIA, and are referenced throughout the report to support the findings and provide additional information.

LVIA Figures

2.6 The Figures produced as part of the LVIA are appropriate in the level of detail provided and clarity of information presented. The figures are clearly listed within section 10.1.2 of the LVIA, and are referenced throughout the report to support and illustrate the findings.

3.0 Methodology and Scope

The following section provides a review of the LVIA Methodology based on the following criteria (where applicable):

- *Has the LVIA been prepared by 'competent experts';*
- *Is the methodology in accordance with relevant guidance and meets the requirements of the relevant Regulations;*
- *Does the methodology and scope of the LVIA meet the requirements agreed in discussions at the pre-application stage during scoping and consultation;*
- *Has the methodology been followed in the assessment consistently;*
- *Are the levels of effect clearly defined, and have thresholds and approach to judging significance been clearly defined;*
- *Is detail about various development stages provided and appropriately assessed;*
- *Have cumulative landscape and visual effects been addressed.*

LVIA Methodology

3.1 The LVIA Methodology is presented in paragraphs 10.4.38 to 10.4.52 of the LVIA and *Appendix 10.1: Landscape and Visual Methodology and Assessment Criteria*. Reference is made in section 12.4.21 to industry best practice, including GVLIA3. It clarifies in Section 12.4.22 compliance with GVLIA3 guidance by assessing both **landscape effects** and **visual effects** as interrelated but separate components.

3.2 The process and stages of assessment are clearly presented, including a baseline assessment, the detailing and review of the design, assessment of sensitivity (by assessing value and susceptibility), an assessment of magnitude of impact (in relation to size, scale, geographical extent, duration and reversibility) of the development on the baseline conditions, and a determination of the significance of effects at all phases of the scheme (construction, year 1, year 10 and decommissioning).

3.3 The study area selection and establishment are explained in detail within paragraphs 10.4.1 to 10.4.15 of the LVIA. The Study area is illustrated in Figure 10.1. The radius of the study area of 3km for elements up to 6m in height and 5km for elements up to 12m in height: these study areas are justified and appropriate and it is unlikely Significant landscape and visual effects would occur beyond these distances.

3.4 The baseline conditions have been determined following a mix of desk and field studies alongside consultation with appropriate consultees. Desk research has included the prevailing policy framework and fieldwork carried out by qualified (Chartered) and experienced landscape architects.

3.5 The methodology is clear, with section 1.4 covering landscape effects and section 1.5 covering visual effects. Paragraphs 1.4.2 (landscape) and 1.5.1 (visual) of *Appendix 10.1* clarify how the significance of landscape and visual effects are determined by combining judgements regarding the sensitivity of the receptor and the magnitude of the effect arising from the Development.

3.6 Tables within the methodology provide criteria for assessment of value, and susceptibility, and subsequently how these have been combined to provide a judgement on sensitivity. These tables provide clear indicative criteria of the assessment of landscape and visual value, susceptibility, sensitivity and magnitude of effects. The utilisation of professional judgement is promoted within the methodology, should an effect be different to that presented within the tables.

3.7 The assessment methodology has been carried through into the main assessment and used consistently.

3.8 The assumptions made on plant growth rates are generally acceptable, however we would state these are at the higher end of the scale as to what we would deem acceptable for a ten-year period: ten years being the period that residual effects have been assessed in the LVIA. We would be more comfortable with the assumed plant growth rates being more aligned with a fifteen-year period, as this would allow for a longer establishment period, and allow for any plant replacements to have been implemented and also establish should there be plant failures or lack of acceptable growth. These rates are dependent upon the

successful implementation of management plan, which is covered in further sections of this review.

ZTV Methodology

3.9 The process of modelling Zones of Theoretical Visibility (ZTVs) is described within section 1.9 of *Appendix 10.1* (paragraphs 1.9.1 to 1.9.8). The methodology and execution is acceptable.

Visualisation Methodology

3.10 The process of delivering visualisations is presented within section 1.9 of *Appendix 10.1* (paragraphs 1.9.9 and 1.9.13). which states that they were prepared in accordance with the Landscape Institute *TGN 06/19 Visual Representation of Development Proposals*. However, it is not explicit regarding what parameters the proposals have been modelled to. Therefore, it has been assumed that the photomontages have been presented to the maximum allowed parameter heights, and the proposals modelled and presented using visualisations generated with the maximum parameters provided within *Chapter 3: Proposed Development Description,* as this would provide a 'worst case' visualisation. However, this needs to be clarified.

4.0 Appraisal of Landscape Baseline and Effects

The following section provides a review of the Landscape Baseline and Effects, based on the following criteria (where applicable):

- *Has the methodology been followed in the landscape assessment?*
- *Are all landscape receptors and all likely effects comprehensively identified and assessed?*
- *Has the value and susceptibility of landscape resources been appropriately addressed and at appropriate scales (e.g., site, local, regional, and national)?*
- *Is there a clear and concise summation of the landscape effects of the proposals? and*
- *Are potential cross-over topics, such as heritage or ecology, addressed?*

Landscape Baseline

4.1 The Landscape Baseline is considered in section 10.5 of the LVIA, with Figure 10.1 illustrating the Scheme Location and Order limits. The Site covers 1,280 hectares of predominantly agricultural land.

4.2 The baseline follows the LVIA methodology and begins by identifying landscape designations and then describing the underlying landscape conditions identifying the characteristics and elements of the Site and study area. This is summarised in the LVIA chapter and further detail is provided in *Appendix 10.2*. Paragraphs 10.5.2 to 10.5.15 provide a narrative on the existing landscape baseline of the Site. The Lincoln Cliff Area of Great Landscape Value (**AGLV**) was identified at the pre-application stage as a potentially sensitive landscape to be considered, however this area is located approximately 3km to the west of Springwell West and, as clarified in Table 10.3, this was subsequently scoped out of the LVIA due to being *"no visibility of the Proposed Development from this AGLV".*

4.3 The LVIA acknowledges the gently undulating, rural and expansive character of the Site and Study area, however, it also notes that *"there are notable differences in the landscape character across the three identified parcels of land".* The LVIA also identifies that the *"landscape within Springwell West and Springwell Central is more open with limited mature*

vegetation structure whereas the landscape within Springwell East is more enclosed with more dense and established vegetation".

4.4 Published landscape character assessments are considered from paragraphs 10.5.7 to 10.5.15 and illustrated in Figure 10.2, and the author acknowledges that the Site and Study Area reflect the boundaries of the LCAs of the *North Kesteven Landscape Character Assessment* relatively accurately; a brief overall summary is provided in the LVIA of the existing landscape baseline at paragraphs 10.5.2 and 10.5.3, with a detailed narratives contained within section 1.5 of Appendix 10.2. The brief summary in the main LVIA chapter, while limited in detail, aids readers basic understanding of the baseline landscape character.

4.5 No further detailed, or finer grained landscape character assessments have been carried out in the LVIA, which we have assumed is due to the author acknowledging that through the field work carried out, the published landscape character assessments accurately reflect the site and study area.

4.6 This process, undertaken by the applicant, resulted in two district landscape character areas (**LCA**) being considered as landscape receptors for the assessment of effects on them by the Development. These are *LCA 7: Limestone Heath*; and *LCA 11: Central Clays and Gravels*, which are two LCA defined and described in *the North Kesteven Landscape Character Assessment*. The Site falls directly within these two LCA, which the LVIA identifies as *"host landscape character areas".* We agree that beyond the two LCA of LCA 7: Limestone Heath; and LCA 11: Central Clays and Gravels, there are unlikely to be any Significant landscape effects on any of the other identified LCAs.

4.7 Further detail of the landscape baseline is provided within *Appendix 10.2: Baseline Landscape Character Appraisal*, and *Appendix 10.3 Landscape Sensitivity Appraisal*.

Landscape Assessment

4.8 The Landscape Assessment is detailed within section 10.7 of the LVIA, which refers to *Appendix 10.3: Landscape Sensitivity Appraisal*, which includes a clear assessment of Value and Susceptibility, and subsequently the Sensitivity of the landscape receptors, which is aligned with the criteria provided within the methodology. The landscape assessment commences at paragraph 10.9.2 and 10.9.3, which summarises the sensitivity of the two identified landscape receptors within *Table 10.9*.

4.9 As agreed at the pre-application stage, the National Character Areas have not been assessed and are referred to for context only.

4.10 In line with the methodology, the assessment of the landscape effects considers the change to the identified landscape receptors. Both of the identified landscape receptors have been assessed as being of medium/low sensitivity,

4.11 The LVIA identifies significant landscape effects at the phases of **construction, operation (year 1),** and **operation (year 10),** however no Significant landscape effects were identified at the **decommissioning** stage. The following effects upon identified landscape receptors are identified in the LVIA:

- At **Construction** the following receptors were assessed as having the following landscape effects:
    - LCA7: Limestone Heath: **Major/Moderate Adverse: Significant** (temporary);
    - LCA 11: Central Clays and Gravels: **Major/Moderate Adverse: Significant** (temporary);
- At **Operation (Year 1)** the following receptors were assessed as having the following landscape effects:
    - LCA7: Limestone Heath: **Major/Moderate Adverse: Significant**;
    - LCA 11: Central Clays and Gravels: **Major/Moderate Adverse: Significant**;
- At **Operation (Year 10)** the following receptors were assessed as having the following landscape effects:
    - LCA7: Limestone Heath: **Major/Moderate Adverse: Significant**;
    - LCA 11: Central Clays and Gravels: **Moderate Adverse: Not Significant.**

4.12 These 'Significant' effects represent direct effects on the landscape of the entirety of the Site. At year 10, LCA7: Limestone Heath, which accounts for the majority of the land within the DCO boundary, has been assessed as having a **Major/Moderate Adverse residual** effect even when mitigation planting has established. LCA 11: Central Clays and Gravels has been judged by the author as having a **Moderate Adverse residual** effect even when mitigation planting has established, however has judged this to not be Significant. This accounts for a direct effect on this landscape receptor, and while we agree that professional judgement has been applied and a rational provided within paragraph 10.9.193 in regards to not being

judged a Significant effect, we would query this judgement and would welcome the opportunity to clarify this further during the examination stage.

4.13 Localised removal of vegetation is identified in the assessment of landscape effects; however, it is unclear whether this includes vegetation works on the wider highways network, and what this would entail. We strongly recommend limiting vegetation loss along Site boundaries for access or sight lines, or along construction access routes, because this has the potential to change the character of the local landscape beyond the limits of the Development.

5.0 Appraisal of Visual Baseline and Effects

The following section provides a review of the Visual Baseline and Effects, based on the following criteria:

- *Has the methodology been followed in the visual assessment?*
- *Are all visual receptors and all likely effects comprehensively identified and assessed?*
- *Has the value and susceptibility of visual resources been appropriately addressed?*
- *Is there a clear and concise summation of the visual effects of the proposals?*
- *Are the viewpoints that have been used appropriate and meet the number, location and requirements agreed in discussions at the pre-application stage during scoping and consultation?*
- *Are the Visualisations/Photomontages that have been used appropriate and meet the number, location and requirements agreed in discussions at the pre-application stage during scoping and consultation?*

Visual Baseline

5.1 The Visual Baseline is considered in section 10.5 of the LVIA, and describes in paragraph 10.5.16 that the primary visual receptors identified in the Study Area likely to be affected by the development are Residents; Users of PROW; and Users of local road network. The process of identifying visual receptors started with the development of a Zone of Theoretical Visibility (**ZTV**) analysis, used to assist and identify potentially sensitive receptors. This is described in paragraph 10.5.20 to 10.5.11, with Visual Receptors identified on Figure 10.3 and the ZTVs shown on Figure 10.5.

5.2 Following fieldwork, utilising the information presented within the ZTVs, visual receptors likely to experience views of the construction, operation or decommissioning of the Development were identified. Viewpoints were subsequently selected to represent views from these receptors. The selection of viewpoints formed part of the pre-application consultation and includes locations recommended as part of this process. Viewpoints are located on Figure 10.4.

5.3 Paragraph 10.5.11 summarises the identified receptor groups (residential locations, PROW, and from roads) with likely views of the scheme.

5.4 Paragraph 10.9.10 notes that *"In order to inform the assessment of magnitude and significance of residual effects on landscape character and visual amenity, viewpoint analysis has been undertaken for a total of 40 assessment viewpoints".* These forty viewpoints are presented as photographs within *ES Volume 4: Landscape Visualisations*.

5.5 The baseline follows the LVIA methodology and considers the consultation undertaken at the pre-application stage, which led to agreement on the 40 viewpoint locations. Further detail of the visual baseline is provided within *Appendix 10.4: Viewpoint Analysis.*

Visualisations/Photomontages

5.6 Viewpoints representative of the visual receptors were identified through consultation and agreed upon (refer **Appendix A**). This baseline process resulted in the identification of twelve viewpoints to be developed as visualisations to represent the views of the visual receptors.

5.7 Photographs of viewpoints have been prepared as Type 1 (annotated photographs) and presented within *ES Volume 4: Landscape Visualisations*. Of these viewpoints, twelve have been developed as Type 3 (photomontages) visualisations and presented in *ES Volume 4: Landscape Visualisations* for year 1 and year 10. A methodology for photography and visualisations is provided in *Appendix 10.1: Landscape and Visual Methodology and Assessment Criteria*.

Visual Assessment

5.8 The Visual Assessment is detailed within section 10.7 of the LVIA which includes an assessment of value and susceptibility, and subsequently the sensitivity of visual receptors and viewpoints, which is aligned with the criteria provided within the methodology. A viewpoint analysis has been carried out on the fourty assessment viewpoints to inform the assessment of magnitude and significance of residual effects on visual amenity. This is detailed within Appendix *10.4: Viewpoint Analysis.* This is subsequently summarised in *Table 10.11 Viewpoint Analysis Summary* within the LVIA, which clearly lays out the Scale of Change for both visual and landscape aspects.

5.9 The visual assessment commences at paragraph 10.9.4 and Table 10.10 summarises the sensitivity of the identified visual receptors through combining value and susceptibility. Twelve receptors have been assessed as being of High/Medium sensitivity, with none identified as being of a high sensitivity.

5.10 The visual baseline is structured around receptors with viewpoints utilised to represent views and inform judgements on magnitude and significance of residual visual effects of those identified receptors. This approach is aligned with recent LI guidance which confirms that the "*focus of the visual assessment should be the visual receptors"*, and that viewpoints are for the *"illustration of the visual effects*".

5.11 The LVIA identifies significant visual effects at the **construction, operation (year 1),** and **operation (year 10)** phases, however no significant visual effects were identified at the **decommissioning** stage.

5.12 The following significant effects are identified in the LVIA, summarised in paragraphs 10.9.55 to 10.9.136 (for construction effects) and 10.9.194 to 10.9.333 (for operation effects – both year 1 and residual at year 10) within the LVIA:

- At **Construction**:
    - **Major Adverse** (significant) visual effects for:
        - PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary (including several 'Stepping Out' walks);
    - **Major/Moderate Adverse** (significant) visual effects for:
        - Minor Roads to Temple Bruer and Thompsons Bottom Farm
        - PRoWs and lanes north-west between A15 and Wellingore Heath including New England Lane and Gorse Hill Lane
    - **Moderate Adverse** (significant) visual effects for:
        - PRoW between RAF Digby and B1188 (Footpath R5/1);
        - Bloxholm Woods Local Nature Reserve Footpath;
        - Spires and Steeples Trail;
        - A15 trunk road;
        - B1191 (Heath Road)
    - **Moderate Adverse** (Not significant) visual effects for:
        - Navenby Lane
        - Church Lane, church and properties at Brauncewell
        - PRoWs and lanes south-west between A15 and Brauncewel

These are typically identified for receptors that are in close proximity to the development with limited or absent screening. These **Moderate** and **Major Adverse** effects are considered to be significant and would result from the proposed construction activity seen at close range across a wide extent of a view.

- At **Operation (Year 1)**:

  - **Major Adverse** (significant) visual effects for:
    - PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary (including several 'Stepping Out' walks);

  - **Major/Moderate Adverse** (significant) visual effects for:
    - PRoW between RAF Digby and B1188 (Footpath R5/1);
    - Minor Roads to Temple Bruer and Thompsons Bottom Farm;
    - PRoWs and lanes north-west between A15 and Wellingore Heath including New England Lane and Gorse Hill Lane;
    - A15 trunk road;

  - **Moderate Adverse** (significant) visual effects for:
    - Bloxholm Woods Local Nature Reserve Footpath;
    - Spires and Steeples Trail;

  - **Moderate Adverse** (Not significant) visual effects for:
    - Navenby Lane;
    - Church Lane, church and properties at Brauncewell;
    - PRoWs and lanes south-west between A15 and Brauncewel;
    - B1191 (Heath Road)

    These are typically identified for receptors that are in close proximity to the development with limited or absent screening. These **Moderate, Major/Moderate Adverse** and **Major Adverse** effects are considered to be significant and where any mitigation planting is yet to establish and is subsequently providing limited screening or integration of the development.

- At **Operation (Year 10)**:

  - **Moderate Adverse** (significant) visual effects for:
    - PRoWs between Blankney, Scopwick and Kirkby Green extending up to Blankney Walks Lane and the railway on the eastern site boundary (including several 'Stepping Out' walks);
    - A15 trunk road;

    Moderate Adverse (Not significant) visual effects for:
    - PRoWs and lanes south-west between A15 and Brauncewel
    - PRoWs and lanes north-west between A15 and Wellingore Heath including New England Lane and Gorse Hill Lane

5.13 The development has been identified in the LVIA as resulting in a Significant change to a variety of visual receptors during construction and in the early years of operation and maintenance, with Significant *residual* visual effects much reduced in number. Seven of these sensitive receptors were assessed as having significant effects prior to any mitigation planting maturing (at Operation year 1). This reduces to two receptors experiencing significant residual effects at year 10 which suggests a potential over reliance upon mitigation planting to screen the proposals without full attention to the potential impact of this screening on the landscape. These residual Significant effects have been identified as arising from sensitive users along PROW and users of the A15 where it is not possible to sufficiently screen views of the development, or in the case of the A15 where the mitigation itself may cause an adverse effect (through screening open views). The reduction in Significant visual effects relies upon the successful establishment of the mitigation planting scheme.

5.14 Access, and the wider highways elements of the scheme, do not appear to be fully considered in the LVIA beyond increased traffic during construction and decommissioning phases. This is despite the potential for adverse effects on the views of the rural landscape including potential vegetation loss, urbanisation and reduction of visual amenity. Consequently, the visual effects during construction may be underestimated within the LVIA due to the unconsidered impact of loss of vegetation. We recommend limiting vegetation loss along site boundaries, for access or sight lines, or along construction access routes, as this has the potential to change the character of the local landscape beyond the limits of the development. Clarification on this matter by the applicant should be provided.

6.0 Appraisal of Cumulative Landscape and Visual Effects and Residential Visual Amenity Assessment

The following section provides a review of the cumulative effects and Residential Visual Amenity Assessment (RVAA), based on the following criteria:

- *Have cumulative landscape and visual effects been addressed?*
- *Are the RVAA and cumulative effects methodologies in accordance with relevant guidance and meet the requirements of the relevant Regulations?*
- *Does the methodology and scope of the assessment of cumulative effects and RVAA meet the requirements agreed in discussions at the pre-application stage during scoping and consultation?*
- *Has the methodology been followed consistently?*
- *Are residential and cumulative receptors and all likely effects comprehensively identified?*
- *Are any residential properties (receptors) likely to experience significant effects to their visual amenity?*

Cumulative Methodology

6.1 Cumulative landscape effects are considered in *Chapter 16: Cumulative Effects*, and not summarised in the LVIA chapter. It would have been useful to provide a brief summary in the LVIA chapter, however the cumulative landscape and visual effects section within ES Chapter 16 is dealt with separately in paragraphs 16.6.11 to 16.6.45 and provides a clear assessment of the cumulative landscape and visual effects.

6.2 Schemes that are considered for the cumulative assessment are identified within *Table 16.3 Short list of other existing development and/or approved development* and illustrated on *Figure 16.2: Cumulative Short List Radius*. *Table 16.2 Zone of Influence for each environmental factor* clarifies that a 10km zone of influence from the order limits has been considered for cumulative Landscape and Visual matters.

Cumulative Landscape and Visual Effects

6.3 Cumulative landscape and visual effects are those that: "*result from additional changes to the landscape or visual amenity caused by the proposed development in conjunction with other developments"*.

6.4 National Grid Navenby Substation is identified as the primary project to potentially generate cumulative landscape or visual effects with Springwell Solar Farm. Subsequently Significant cumulative effects are identified through extending the overall area of development, increasing the land use area changed from agricultural to energy infrastructure, and also visually through increasing the extent the two schemes may likely be visible by receptors.

6.5 We note that para. 16.6.41 states that "*No further additional mitigation has been proposed to mitigate inter-project cumulative effects between the two developments.*" However, there are potential opportunities for the applicants of each scheme to coordinate mitigation planting in the area around the National Grid Substation, which we would recommend are investigated further if possible. For example, this may include the extending of carriageway hedgerow planting further north along the western edge of the A15 (such as along field parcels Bcd024, Bcd027, Bcd031), which are in the Springwell Order Limits and would bring mitigation planting closer to potential visual receptors, likely further screening the proposed National Grid Substation.

6.6 We would also expect that landscape and visual cumulative effects would be likely from:

- 23/0390/EIA SCO Town and Country Planning Act 1990 Navenby Heath 400 Megawatt (MW) Battery Storage Development 2km north west; and
- 24/0959/FUL Town and Country Planning Act 1990 RAF Digby Proposed office and training building Adjacent to Order Limits/within Order Limits.

Table 16.11 identifies cumulative effects from these two schemes, with further detail provided from paragraph 16.7.48. However the LVIA identifies in paragraph 16.7.55 that *"No significant inter-project cumulative effects have been identified and therefore it is considered that there is no additional mitigation is required above what is described".*

6.7 Leoda Solar Farm, to the west of Springwell Solar should also be considered in wider landscape and visual effects. While it is unlikely this scheme would be seen in the same view as Springwell, the change in land use in the wider landscape, along with potential for sequential views, particularly when considering travelling east to west with sequential views of Springwell, Leoda and Fosse Green possible along linear routes.

6.8 We also have concerns regarding effects on the national, county and regional landscape character areas; The mass and scale of several NSIP scale energy projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing these schemes across potentially several kilometres, albeit with gaps between the schemes. However repeated views and presence of large scale solar would undoubtably increase the susceptibility of receptors to changes in view.

6.9 To calibrate this cumulative change to the landscape, these schemes combined, if built, would clearly require the update of any published landscape character assessment, including at a national level (NCA's), so as to include large scale solar as a defining land use characteristic, as well as agriculture. This is a clear and marked change to landscape character.

Residential Visual Amenity and Settlements

6.10 Residential Visual Amenity has been assessed and presented within *Appendix 10.5 Residential Visual Amenity Assessment*. As clarified within paragraph 10.4.53 of the LVIA *"Residential Visual Amenity Assessment is a stage beyond Landscape and Visual Impact Assessment and focuses exclusively on private views and private visual amenity",* whereas the LVIA process is typically associated with public views from public areas.

6.11 The methodology for assessing Residential Visual Amenity is outlined within Section 1.4 of Appendix 10.5. This correctly references the Landscape Institute's Technical Guidance Note *2/19: 'Residential Visual Amenity Assessment',* which identifies in paragraph 1.3.2 of

Appendix 10.5 that the Residential Visual Amenity Threshold (**RVAT**) is reached when further the change to visual amenity of individual properties identified as *"having the greatest magnitude of change"*

6.12 *Table A10.5.1 Preliminary residential property visits* within *Appendix 10.5* and *Figure 10.10* identify those properties identified and those visited sited as part of the assessment of Residential Visual Amenity.

6.13 Paragraph 10.7.1 of Appendix 10.5 concludes that while there will be significant adverse visual effects from several properties, none of these will reach the RVAT.

6.14 Paragraph 10.7.2 goes on to identify mitigation commitments that have been developed to reduce visual effects on residential properties.

6.15 A concern was identified at the scoping stage that receptors in the villages/settlements of Scopwick, Kirkby Green, Blankney and Ashby de la Launde; along with residents of the barracks at RAF Digby, would have views of the development, and subsequently had the potential to experience adverse visual effects. It was requested that the applicant include an assessment of changes in view from these receptors.

6.16 Now the scheme is fixed and has responded to potential views from these receptors, there is limited intervisibility between the settlements and the proposals as identified in the LVIA, which is detailed in paragraphs 10.5.18 to 10.5.27 and Paras 10.5.28 to 10.5.30 of the LVIA. We have not identified anything that would contradict the statements in regards to intervisibility made in the LVIA. Therefore, any further detailed assessment by the applicant would re-iterate the statements made in paragraphs 10.5.18 to 10.5.27 and Paras 10.5.28 to 10.5.30 of the LVIA, and therefore would not be required.

6.17 The key areas of concern are communities and visitors accessing these settlements on the surrounding road and footpath networks, where there are views of the development identified, and the LVIA confirms that sensitive visual receptors will experience adverse visual effects in these locations.

7.0 Mitigation and Design

The following section provides a review of the Mitigation and Design, based on the following criteria:

- *Is there evidence of an iterative assessment-design process and it is clear that this has informed the site redline, layout and primary and secondary mitigation?*
- *How appropriate is the proposed mitigation?*
- *Are potential cross-over topics, such as heritage or ecology, addressed and incorporated within the mitigation?*
- *Is the long-term management of existing and proposed vegetation properly addressed in any management plans to promote establishment?*

Evidence of Iterative Process

7.1 The scheme has been presented as evolving through an iterative process, with the landscape and visual findings feeding back into the design. This has been evident at several consultation workshops and meetings held between the applicant and LCC, NKDC and community engagement sessions. This is clarified in paragraph 3.1.3 which states that the scheme has: "*evolved throughout the environmental assessment process to avoid or minimise environmental effects and in response to consultation and engagement feedback".* It is noted that the layout appears to respond to issues and points raised through these sessions and the AAH TMs that were subsequently issued.

7.2 The design appears to have a clear evolution through different stages of the masterplan. The mitigation has responded to the recommendations of the local landscape character area reports and feedback from community events and statutory consultees.

Mitigation Measures

7.3 Section 3.2 of the ES describes Green Infrastructure proposed as part of the Scheme (covered by Work Order 9). The location of the proposed Green Infrastructure is subsequently located according to the Works Plans.

7.4 Section 10.6 of the LVIA describes the embedded mitigation measures of the scheme which avoid, where practicable, adverse effects on the landscape and views. This process is described in more detail within ES Chapter 3 and Chapter 4. These mitigation proposals reference a series of documents within the DCO package, in particular the Design Approach document which lays out how landscape and visual matters have been addressed within the design.

7.5 The *Outline Landscape and Ecology Management Plan* provides information regarding the establishment and maintenance of the planting associated with the Development, as shown on *Figure 3.1: Zonal Masterplan* and *Masterplan* and in more detail within *Figures 3.3A* to *3.3F: Green Infrastructure Parameters*.

7.6 The success of the landscape mitigation to meet the objectives laid out in the management plan - to integrate and screen proposals, promote conservation and protection of the environment, and encourage ecological and habitat diversity - is highly dependent upon the successful management and maintenance of the new planting, as well as the protection of exiting trees and hedgerows. The maintenance operations provide an initial overview of operations; however, we would expect the management plan to be developed further, well beyond the initial 5-year period, particularly if landscape and visual effects are being assessed at 10 years. The long-term reduction in landscape and visual effects, presented in the LVIA, are based on the long-term success of the landscape mitigation, and therefore the management plan should cover at least this period, and likely should be in place and actively managed for the lifetime of the project. Similarly, any early planting (pre-construction) should be included in the maintenance plan as the reduction in effects described in the LVIA are also based on the assumption that this too will have established as planned.

7.7 Monitoring of the proposals is a key aspect of the mitigation plan and is something which needs further development to ensure there is sufficient robustness to deal with the challenging climatic conditions when it comes to establishing new planting. The updating of the management plan every 5 years after the initial establishment period will go some way to ensuring that it is kept valid and can respond to issues and trends effectively. Plant replacements should also be considered, and also for a longer period then a “standard” 5 years, and cover for scenarios where there are large areas that have not established, or areas of die back beyond 5 years.

7.8 There is a potential over reliance within the LVIA upon planting to mitigate the visual effect of the development; the character of the area is relatively open, and too much planting to screen the development without due care for the location, could have detrimental impacts. The PROW and local roads in the study area enjoy an open aspect across some areas of the study area, in particular along the A15, where users currently experience open views across this agricultural landscape. Therefore, care needs to be taken to prevent the loss of this character through an overbearing set of mitigation proposals.

7.9 We would re-emphasise the point made in the cumulative effects section regarding potential opportunities for the applicants of Springwell and the Navenby Substation schemes to coordinate mitigation planting in the area around the proposed National Grid Substation.

8.0 Conclusions and Recommendations

The following section provides an overall summary and conclusion on the suitability of the Landscape and Visual elements of the DCO Application and whether they are sufficient to support an informed decision. This includes the adequacy of the LVIA, reviewed in accordance with the Landscape Institute *Technical Guidance Note 1/20 (10 Jan 2020): Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)*.

Finally, there are recommendations for further information that should be provided to assist in the examination of the DCO Application.

Summary and Conclusions on the LVIA

8.1 The LVIA and the associated figures, appendices and documents provide a thorough analysis of the Development and is appropriate to the scale and context of the Site. The process of assessment is thorough and well explained in the volumes, which include a clear summary of findings and identification of significant effects on the landscape and visual baseline.

8.2 By reason of its mass and scale, the Development would lead to significant adverse effects on landscape character and visual amenity at all main phases of the scheme (construction, operation year 1, operation year 10). The Development has the potential to transform the local landscape by altering its character on a large scale. This landscape change also has the potential to affect a wider landscape character, at a regional scale, by replacing large areas of agricultural or rural land with solar development, affecting the current openness, tranquillity and agricultural character that are identified as defining characteristics of the area.

8.3 The scale and extent of development would also lead to significant adverse effects on views from receptors, by altering from views within an agricultural or rural landscape to that of a landscape with large scale solar development.

8.4 The cumulative landscape and visual effects of the Development have the potential to bring about significant landscape and visual effects, however adjacent schemes identified within the ES are relatively small in comparison with the wider Springwell order limits schemes. We have concerns regarding effects on the national, county and regional landscape

character areas. The mass and scale of these projects combined has the potential to lead to adverse effects on landscape character over an extensive area across these published character areas. The landscape character of the local, and potentially regional area, may be completely altered over the operational period through an extensive area of land use change, and introduction of energy infrastructure in an area that is predominantly agricultural. This would also be an issue when experienced sequentially for visual receptors travelling through the landscape and experiencing these schemes across potentially several kilometres, albeit with gaps between the schemes. This is a clear and marked change to landscape character.

8.5 Tree and vegetation removal associated with the Development, including wider highways improvements and access for construction, must be clarified through the examination process, and subsequently any works (such as lopping or pruning), or removal of trees and hedgerows must be agreed prior to any works commencing. Prior to any construction activities, all tree and hedgerow protection methods associated with that phase of construction should also be clarified and subsequently agreed with the appropriate authority (in this case the local planning authority). This would be to BS:5837 Trees in Relation to Construction and any subsequent arboriculture method statements, again this should be approved by the appropriate authority. In particular this should ensure existing trees, and associated root protection areas, are suitably protected throughout the entire construction period. This would also likely include areas within the order limits, but away from construction activity, such as storage areas for materials which may suffer from tracking by plant that would damage tree root protection zones.

8.6 While the submission includes landscape proposals (as shown on the Green Infrastructure Parameters plans), these are of a high level and it would be expected that if the project proceeds much more detailed plans would to be submitted and subsequently agreed with the appropriate authority prior to the commencement of any works and secured through the DCO. This would include clear detail of the areas of landscape mitigation, location and types of planting (species), as well as number, density and specification. The mitigation illustrated on the *Outline Landscape and Ecology Management Plan* has been utilised to assess the landscape and visual effects of the scheme, therefore we would expect any detailed landscape proposals to consist of the area and extent shown on these plans as a minimum.

APPENDIX A

Previous AAH Consultation documents:

AAH TM01 Landscape and Visual Scoping Opinion 14th April 2023

AAH TM02 Initial Viewpoint Comments 29th June 2023

AAH TM03 Viewpoint Comments 15th August 2023

AAH TM04 PIER Comments 19th February 2024

AAH TM05 Viewpoint Comments 10th July 2024

Technical Memorandum 1: AAH TM01

Lincolnshire County Council, Springwell Solar Farm

Landscape and Visual Scoping Opinion

This Review has been carried out by AAH Consultants on behalf of Lincolnshire County Council (LCC) and relates to landscape and visual issues and elements only. It is based upon a review of the relevant sections of the following document:

- *Springwell Solar Farm; Scoping Report; 21st March 2023.* Prepared by *RSK Environment Limited* for *Springwell Energy Farm Ltd.*

Overall, we would expect that the assessment of potential Landscape and Visual matters and evolving proposals relating to the Springwell Solar Farm, as a Nationally Significant Infrastructure Project (NSIP), follow an iterative process of engagement and consultation to ensure the following are not fixed at this stage and are discussed, developed and agreed at subsequent technical meetings:

- Landscape and Visual Impact Assessment (LVIA) Methodology;
- Development, and subsequent ZTV, parameters;
- Study Area extents (distance);
- Viewpoint quantity and locations;
- Photomontage/Accurate Visual Representations (AVRs):
    - Quantity and location;
    - Phase depiction;
    - AVR Type and Level.
- Mitigation Measures/Landscape Scheme/Site Layout;
- Cumulative effects, including surrounding developments to be considered; and
- The extent as to which a Residential Visual Amenity Assessment (RVAA) should be considered (based on the Landscape Institute TGN 2/19) if there are residential properties with receptors likely to experience significant effects to their visual amenity.

We would also expect the production of the Landscape and Visual chapter of the Environmental Statement (ES), which would be in the form of a Landscape and Visual Impact Assessment (LVIA), and any supporting information (such as plans or figures) reflect current best practice and guidance from, as a minimum, the following sources:

- *'Guidelines for Landscape and Visual Impact Assessment'*, (GLVIA3), April 2013 by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA);
- *'An Approach to Landscape Character Assessment'*, Natural England (2014);
- '*Technical Guidance Note (TGN) 06/19 Visual Representation of Development Proposals'*, 17th September 2019 by the Landscape Institute (LI);
- *'Technical Guidance Note (TGN) 1/20 Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)'*, 10th January 2020 by the Landscape Institute (LI) ;
- *'Technical Guidance Note (TGN) 04/20 Infrastructure',* April 2020 by the Landscape Institute (LI); and

- *'Technical Guidance Note (TGN) 2/21 Assessing landscape value outside national designations'*, May 2021 by the Landscape Institute (LI).

While the focus of this review is on Landscape and Visual matters, other information provided within the report, and associated Appendices, has also been considered, providing background and context to the site. At this initial stage of the NSIP process, the content and level of information provided by the developer within *Section 6.5 Landscape and visual* are generally considered satisfactory, however, as stated previously, we would expect to discuss this content and approach as part of the iterative process. Due to the scale and extent of the site and proposed development, we would be able to discuss and agree the *Scoping questions* within *Section 6.5.14* as part of this ongoing process, as at this stage it is not possible to provide full answers to these questions. The following should be considered in the evolving assessment and layout:

Viewpoints

The final locations of viewpoints are to be reviewed and agreed with LCC and other relevant stakeholders. The final viewpoint selection should also consider views of taller and more conspicuous elements, such as battery storage or sub-stations once the layout is more developed, as well as consider potential key, or sensitive, viewpoints. We would welcome an initial discussion and subsequent workshop (on site if appropriate) with the developer's team in regards to proposed viewpoints.

Photomontages

To gain an understanding of the visibility of the development and how the panels and infrastructure would appear in the surrounding landscape, Photomontages/Accurate Visual Representations (AVRs) should be produced. The number and location of the agreed viewpoints to be developed as Photomontages/AVRs should be agreed with LCC and other relevant stakeholders and produced in accordance with *TGN 06/19 Visual Representation of Development Proposals*. At this stage, it is deemed appropriate that these should be produced to illustrate the proposals at different phases: Existing Situation (baseline), Operational (year 1) and Residual with planting established (10 to 15 years). The Photomontage/AVR Level and Type is to be discussed and agreed.

Methodology

As stated previously, the LVIA should be carried out in accordance with the GLVIA3 and undertaken by suitably qualified personnel. The methodology provided at *Section 6.5.11 and Appendix D* is typical of those used for ES Chapters and standalone LVIA where potential significant effects can be considered and reflects the guidance in GLVIA3. We would request that the most up to date technical guidance be used and the methodology is further interrogated at the next phases of the project.

The *Landscape and Visual* methodology within *Appendix D* identifies that **Significant** effects are identified as those that are "*Major or Major/Moderate*", and that in the case of predicting *Moderate effects* professional judgement will be applied. This is fine and follows GLVIA3, however for full transparency, we would expect that a full explanation be provided in the assessment as to whether a Moderate effect on a receptor is assessed as being **Significant** or not, and not simply relying on stating that an effect is not significant "based on professional judgement".

The methodology should also clearly lay out the process of assessing temporary and permanent elements of the scheme, and the LVIA should clearly identify those elements that would not be

decommissioned at the end of the life of the development, such as the National Grid substation, and assessed accordingly.

Scope of the Study Area:

It is acknowledged in *Section 6.5.2* that, based on desktop (ZTV mapping) and field study, an initial Study Area covering 3km has been allowed for the proposed development, and an extended Study Area covering 5km for the National Grid substation and National Grid connecting tower. At this early stage, we recommend these extents are discussed and further reviewed as the full extent of potential visibility of the development is not yet fully known, and the ZTV mapping within *Appendix F* does identify potential visibility beyond these extents. The ZTV mapping would be updated once the proposals have developed (as stated within paragraph 13.5) and the study area should not be fixed until the full extents of visibility are known from both desktop and site work.

Once the study area has been defined, the LVIA should also provide a justification for the full extent/distance, which would be further refined as part of the iterative process.

Landscape

Published landscape character areas have been identified, however to align with GLVIA3 the LVIA should include an assessment of landscape effects at a range of scales and likely need to include a finer grain landscape assessment that includes the Site and immediate area that also considers individual landscape elements or features that make up the character area. *Sections 6.5.8*. and *6.5.9*. identify a range of potential landscape receptors to be scoped in or out of the LVIA, however at this early stage of the project we request these be reviewed and consulted upon further once proposals have been developed and we are not in a position to confirm their inclusion or omission.

Visual

Several visual receptors are identified within *Sections 6.5.5*. and *6.5.8*. We would expect that the visual assessment would include for identification of visual receptors, and not just an assessment of any agreed viewpoints, which should clearly cross reference viewpoints to associated receptors. *Sections 6.5.8*. and *6.5.9*. identify a range of potential visual receptors to be scoped in or out of the LVIA, however at this early stage of the project we request these be reviewed and consulted upon further once proposals have been developed and we are not in a position to confirm their inclusion or omission.

The visual assessment should take account of the 'worst case scenario' in terms of winter views, and effects associated with landscape mitigation at the Operational Phase (year 1), Residual Phase with planting having established (10 to 15 years), and at the Decommissioning Phase.

The LVIA should ensure all elements associated with the development are considered and assessed, such as battery storage, sub-stations, CCTV poles and boundary fencing, which may be more visible than panels due to height, mass and extent.

Cumulative impacts

Cumulative Landscape and Visual effects should be assessed in regards to other major developments, and in particular commercial scale solar developments, as appropriate in regards to proximity and scale.

Mitigation and Layout

As this is an iterative process, at this stage it is not relevant to comment on any potential mitigation or layout of the development. However, best practice guidance, relevant published landscape character assessment's and Local and County Council Policy and Guidance shall be referred to and implemented as appropriate.

We would also expect the landscape and planting scheme is coordinated with other relevant disciplines, such as ecology, heritage or civils (e.g. SuDS features), to improve the value of the landscape and reflect appropriate local and regional aims and objectives. Any Landscape Scheme and associated Outline Landscape and Ecological Management Plan should accompany the ES which should cover the establishment period, which is assumed would be up to 15 years to cover the period up to the residual assessment. The management plan should provide for both new planting and existing retained vegetation and how it will be managed and protected through all phases of the development.

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14th April 2023

AAH consultants

Technical Memorandum 2: AAH TM02

Lincolnshire County Council, Springwell Solar Project

Visual Amenity: Initial Viewpoint Comments

An initial Site visit was carried out by representatives from AAH, Lincolnshire County Council (LCC) and North Kesteven District Council (NKDC) on 1st June 2023, which was followed by a meeting with Stephenson Halliday and LDA Design at LCC offices to discuss the proposed scheme, progress to date and strategy for the landscape elements over the coming weeks and months. Following the initial site visit and discussions on the 1st June, a plan and schedule identifying a shortlist of potential viewpoints for the LVIA were issued to AAH, LCC and NKDC via email. AAH subsequently visited site with Stephenson Halliday on the 13th June 2023 to view the site and surrounding area and visit key locations and discuss the potential viewpoints currently proposed for the LVIA.

Therefore, we have the following general comments and requests:

1. Comments provided are based on the information provided to AAH and subsequent AAH fieldwork carried out to date. Therefore any comments are based on the layouts currently provided, which are confirmed as undergoing development. This is to be expected as part of an iterative process. While we understand that the information provided to date is not intended to undergo wholesale changes, the layout is undergoing design development and subject to the final layouts presented, additional viewpoints or information may be requested. This is particularly pertinent for taller/larger and permanent elements such as sub stations or battery storage which due to their mass will likely be more conspicuous in the landscape;

2. The locations of ancillary elements, such as fencing, Battery Storage, Inverters, Transformers and Switchgears will be important in reducing visual impacts as these could appear more conspicuous than uniform PV arrays – their location should be carefully considered in relation to visual receptors, but also relating to the PV Arrays. The final size and location of all these ancillary elements should be provided and indicated on the layouts when available to enable their impact to be understood; and

3. We do not feel we can provide more detailed feedback or suggested viewpoint locations at this stage on the sub-station location(s) until further information is provided. However, we would expect the LVIA to provide a clear evaluation and likely effects of these.

For detailed comments on the proposed viewpoints, please refer to the appended schedule provided to us by Stephenson Halliday. The detailed comments have been added to an additional column to aid clarity.

The following additional comments are in regards to visibility of the site from general groups of receptors and viewpoints, and we have also marked up the plan provided to us by Stephenson Halliday, appended to this memo, which locates the comments below. We would suggest the comments provided are discussed further prior to finalising. If it is considered that suggested views of the site and development are not attainable from any identified areas, or viewpoints not appropriate, a statement to this effect should be provided to aid transparency. It is important that all viewpoint photography should provide the most advantageous views of the site and proposed development, and avoid any obstructions to a clear view such as cars:

A. **Longer distance views identified (X2, X1, X3) are unlikely to provide views of the Development, and at this stage views from receptors in these areas to the west, such as communities at Waddington, Navenby, Wellingore or Welbourn or along the A607, or PROW in these areas. However, a view from more sensitive receptors in these areas would be useful to demonstrate this, such as along the eastern settlement edge.**

B. **Potential additional viewpoint included from the area around Thompson's Bottom and western boundary.** This would provide a clear view east to the site adjacent to the OH line and will include views of the A15 and also longer range views to the east;

C. **Please review visibility and potential views of the site and development from the area south west of VP C12, around Church of St John the Baptist.** While intermittent vegetation and landform will screen some views, there are potentially sensitive receptors in this area and the upper extents of development may be visible. This may not require a viewpoint, however views from this location should be considered within the assessment.

D. **Please review visibility and potential views of the site and development from within Bloxham Wood Nature Reserve.** Subject to the location of the substation, it is unlikely that this would require an additional viewpoint, as we have assumed Viewpoints I20 and I18 would provide an illustrative view of this), however views from this location should be considered within the assessment as it is unclear as to the extent as to which vegetation would screen views of the development from this location as a path runs close to the southern edge of the woods;

E. **Please review visibility and potential views of the site and development from PROW Temp/1/1 and Temp/2/1 at junction of the A15.** Views from this location (and along the PROW to the east and west) would likely be more sensitive and close range than from Viewpoint C17. Would a viewpoint from this location be appropriate, either relocated C17 or an additional view)?

F. **Views from PROW within Eastern Parcel (e.g. H8, H18, D8 etc.):** these are from sensitive receptors and viewpoints from these PROW will be required to illustrate these views. Locations for photographs should be selected to ensure the most advantageous views of the site and proposed development are illustrated with proposals centre to the view, avoiding obstructions where possible;

G. While views along the B1191 between Scopwick and RAF Digby are covered by Viewpoints H12 and H14, would a view **covering Scopwick Mill and PROW Scop/13/1** be required to cover more sensitive receptors in this area? Alternatively, these views may be covered by the assessment when discussing potential receptors, however it is important to identify these.

H. Viewpoint B15 provides a clear view north to the Site from users of the A15. The heritage asset of Dunsby Village lies just to the south. Is there a way to capture this in the view without compromising the clear view to the Site, or would B15 be representative of this potential view?

As stated, at this stage we do not have details on the final location and appearance/extent of taller/larger elements that for part of the development which would likely have visual impacts that may require additional viewpoints beyond those initially identified.

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29 June 2023

Legend:

- Proposed Site Boundary
- Photo Locations

Coordinate System: British National Grid
Projection: Transverse Mercator
Datum: OSGB 1936
Units: Meter

Rev	Date	Description	Drn	Chk	App
00	09/06/23	First Draft	MP	JI	

Springwell Solar Farm

Springwell Solar Farm

DOCUMENT:
Consultation

TITLE:
Shortlisted Viewpoint Selection for Discussion with NKDC/LCC

FIGURE NUMBER:

0 0.5 1
Kilometers

Scale: 1:50,000 @ A3

REV 00

Path: C:\Users\mo.pamplin.RSKHELSBY\RSK Group\SH Projects 200s - 0297 - Acre Lane Solar Farm\05 Working Files\02 GIS\P663620.aprx\Consultation Photo Locations

0297 - Springwell Photography Details

Photo Location reference	*Location Name*	*Coordinates*	Co-ordinates		*Time*	*Date*	*Potential Viewpoint?*	**AAH/LCC/NKDC initial Comments on Viewpoints (to be read in conjunction with AAH TM02)**
			X	*Y*				
A3	Spires and Steeples Trail junction with Trundle Lane - N of Scopwick	TF 06972 58430	506972	358430	11.47am	07.02.23	Yes - view from SAST at shouth east corner of Eastern parcel	Agree
A5	Scop/3/1 at junction with Main Street, Scopwick	TF 07616 58049	507616	358049	12.16pm	07.02.23	Maybe - no view of development. Demonstrates no view from Scopwick	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
A10	Spires and Steeples Trail SE of Scopwick - Loctaion 3	TF 07529 57509	507529	357509	01.12pm	07.02.23	Maybe - no view of development. Demonstrates no view from SAST south of Scopwick	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
A12	Scop 7/1 at junction with B1191	TF 08651 57963	508651	357963	02.31pm	07.02.23	Yes - view from PROW immeiately north of Kirkby Green	Agree
A13	Scop 7/2 at junction with Scop 7/1	TF 08583 58371	508583	358371	02.47pm	07.02.23	Maybe - PROW approaching site	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
A17	B1188 jct with Bloxholm Lane - east side of junction	TF 06649 58523	506649	358523	03.44pm	07.02.23	Yes - B1188 at site access	Agree
B3	B1189 Moor Lane, Blankney	TF 10040 60859	510040	360859	10.42am	09.02.23	Maybe - View from B1189 (negligible glimpse of site through vegetation)	Fine - would illustrate potential eastern views.
B5	B1191, west of Junction with B1189 and Station Road	TF 11142 58573	511142	358573	11.17am	09.02.23	Maybe - Illustrates no view from B1191	Is this required? B3 may represent eastern receptors. B5 not particularly sensitive, and asssume no view.
B7	Main Street, west of junction with B1188, Lincoln Road	TF 07720 54830	507720	354830	12.05pm	09.02.23	Maybe - Illustrates negligible view from Digby	Assume limited view?
B10	Church Lane, north of All Staints' Church, Brauncewell	TF 04546 52463	504546	352463	1.06pm	09.02.23	Yes - glimpse view from Brauncewell	Agree: Subject to final location, sub-station may be visible in this location also. If so, assume view would also represent PROW to east
B11	North of junction of A15 and Church Lane	TF 03622 52628	503622	352628	1.22pm	09.02.23	Yes - southern boundary of western parcel	Agree
B14	Junction of Footpath Brau/10/1 and Long Lane	TF 01514 51973	501514	351973	2.16pm	09.02.23	Yes - view from south east of western parcel	Agree
B15	Junction of A15 and local road east of Dale Farm	TF 03847 51623	503847	351623	2.31pm	09.02.23	Yes - view from southern approach on the A15	Agree, would this view include heritage receptor Dunsby Village? If viewpoint relocated to south would the view likely be screened?
B20	The Viking Way / High Dike south of Temple Road	SK 99250 52993	499250	352993	4.18pm	09.02.23	Yes - Distant view from High Dike	Fine. Potentially senstive receptor, however long range view.
C1	Green Man Lane	TF 04209 59058	504209	359058	9.33am	10.02.23	Yes - distant view from minor road to the north	Fine: would this also represent potential views from PROW to the south (Scop/12/2, Scop/1/2, and Scop/1/1) which would likely be more sensitive?
C4	Field entrance, Temple Road	TF 03023 53125	503023	353125	10.50am	10.02.23	Yes - View from Temple Road	Agree
C7	Temple Road east of Temple Bruer	TF 01437 53626	501437	353626	11.18am	10.02.23	Maybe - demonstrates negligible view of site approaching from the west	A useful view to demonstrate visibility from the west
C9	Heath Lane, east of House Farm	TF 00420 57509	500420	357509	11.56am	10.02.23	Yes - View towards potential substation location	Fine. Not particularly sensitive, however provides views of potential substation from north. Could it be clarified if panels would be visible - if not, may be a useful northern view to demonstrate lack of visibility.
C10	Junction of Gorse Hill Lane and A15	TF 02355 56574	502355	356574	12.20pm	10.02.23	View from A15 on northern boundary of site	Agree
C12	New England Lane	TF 01271 55547	501271	355547	12.47pm	10.02.23	Yes - view from PROW near substation/BESS	Agree
C17	Junction of A15 and Green Man Lane	TF 01926 58598	501926	358598	2.02pm	10.02.23	Yes - View from A15 approaching site from the north	Is this the best location? Would an additional view, or potentially moving this viewpoint further south to intersection with PROW Temp/1/1 and Temp/2/1 be appropriate?
D8	Jct of Scop/738/1 and Scop/8/1	TF 09001 59249	509001	359249	11.52am	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
D10	Jct of BLN/4/3, BLN/4/2 and BLN/738/1	TF 08662 60144	508662	360144	12.23pm	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
D12	Permissive Path Between Scop /1134/1 and BLN/4/2	TF 08016 59686	508016	359686	1.00pm	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
D17	Jct of Bridleway Scop/1135/4 and Acre Lane (Restricted Byway)	TF 08239 58901	508239	358901	2.11pm	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
D19	Junction of Acre Lane and Scop/3/1	TF 08241 58453	508241	358453	2.28pm	15.02.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
E2	Blankney Stepping Out Car Park Picnic Area	TF 07418 60577	507418	360577	13.16pm	23.02.23	Yes - view from Stepping out picnic area on edge of Blankney	Agree: sensitive receptors and hih (relative) number of users.
F3	Heath Road at Slate House Farm	TF 04123 54238	504123	354238	12.26pm	24.02.23	Yes - illlustartes experience travelling along Heath Road	Fine - important views along this road between settlements, however, will proposals be visible from this location with plots to the east of Heath Road shown as not being developed? Assume this would also represent views from PROW Ashl/3/1 at Heath Road? Selection would be dependant upon final layouts and visibility of development
G1	A15 at junction with Warren Lane	TF 02761 55278	502761	355278	2.42pm	02.03.23	Yes - View from A15 mid way along the western parcel	Agree - openclose range view. Suggest multiple sheets to cover wide extents of view.
H5	Spires and Steeples Trail	TF 06855 59445	506855	359445	10.29am	08.03.23	Yes - View from SAST	Agree. Views from these sensitive receptors are important
H8	SCOP/1135/3	TF 07537 58946	507537	358946	11.23am	08.03.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
H9	Main Street, Ashby de la Launde	TF 05269 55085	505269	355085	12.07pm	08.03.23	Yes - illustrates view from Ashby de la Launde	Agree - if located at filed gate/access would offer an alternative more open view south than H10
H10	Junction of Heath Road (B1191) and Navenby Lane	TF 04815 55349	504815	355349	12.17pm	08.03.23	Yes - illlustartes experience travelling along Heath Road	Agree - important views along this road between settlements.
H12	Heath Road (B1191) near Digby Quarry	TF 05316 57209	505316	357209	12.56pm	08.03.23	Yes - illlustartes experience travelling along Heath Road	Agree - important views along this road between settlements. Would this adequately consider PROW Scop/13/1 and Scopwick Mill?
H14	B1191 Western Edge of Scopwick	TF 06358 57964	506358	357964	1.25pm	08.03.23	Maybe - demonstrates negligible view from western edge of Scopwick	Good location to demonstrate limited/no visibilit along B1191 and western edge of Scopwick. Will depend upon final layouts.Would this adequately consider PROW Scop/13/1 and Scopwick Mill?
H16	B1188 South of Long Wood Lane	TF 06745 59653	506745	359653	2.42pm	08.03.23	Maybe - demonstrates no view from B1188 leaving Blankney	Good location to demonstrate limited/no visibilit along B1188 and southern edge of Blankley. Will depend upon final layouts.
H18	BLAN/4/2	TF 07771 60245	507771	360245	3.08pm	08.03.23	Maybe - one of several potential viewpoints on footpaths between Scopwick and Blankney	Views from these sensitive receptors are important, however selection would be dependant upon final layouts and visibility of development
H19	Blankney Walks Lane near Brickyard Cottage	TF 08370 60628	508370	360628	3.26pm	08.03.23	Yes - view from Blankney Walks Lane	Agree - VP from this location required
I1	Footpath Rows/5/1 west of Sheffield House	TF 06401 56655	506401	356655	09.00am	23.03.23	Yes - view from footpath through central parcel	Agree - views from PROW 5/1 required. How will the view from each three propose differ - are three required?
I5	Footpath Rows/5/1 north-east of The Maltings	TF 06086 56557	506086	356557	09.43am	23.03.23	Yes - view from footpath through central parcel	Agree - views from PROW 5/1 required. How will the view from each three propose differ - are three required?
I8	Footpath Rows/5/1 north of The Maltings	TF 05581 56426	505581	356426	09.59am	23.03.23	Yes - view from footpath through central parcel	Agree - views from PROW 5/1 required. How will the view from each three propose differ - are three required?
I10	Access track south of Rowston Cottages	TF 05142 56524	505142	356524	10.11am	23.03.23	Maybe - demonstrates limited view from RAF Digby looking east	While likely a limited view, would be useful to illustrate extent/lack of visibility from this aspect, as well as views from RAF Digby, and B1191 which together would have a relatively large number of receptors
I18	AshL/11/1 in Long Plantation (on field boundary)	TF 04464 53376	504464	353376	12.02pm	23.03.23	Yes - view from Stepping Out Walk through Bloxham Woods	Agree - final location may depend upon substation location.
I20	Bloxham Wood Nature Reserve Car Park	TF 03758 53324	503758	353324	12.32pm	23.03.23	Yes - view along Heath Road at entrance to Bloxham Woods	Agree - final location may depend upon substation location.
X1	A607 Boothby Graffoe	SK 98683 59338	498683	359338			Maybe - not yet visited and possibly no view but added to shortlist following meeting with NKDC/LCC on 01.06.23	Views of site and development appear unlikely. Suggest single view, maybe from edge of settlement to demonstrate extent/lack of visibility
X2	Viking Way north of Harmston	SK 97398 63178	497398	363178			Maybe - not yet visited and possibly no view but added to shortlist following meeting with NKDC/LCC on 01.06.23	
X3	A607 Leadenham	SK 96080 51557	496080	351557			Maybe - not yet visited and possibly no view but added to shortlist following meeting with NKDC/LCC on 01.06.23	

AAH consultants

Technical Memorandum 3: AAH TM03

Lincolnshire County Council and North Kesteven District Council, Springwell Solar Project

Visual Amenity: Viewpoint Comments

Following issuing AAH TM02 (Initial Viewpoint Comments), AAH and Stephenson Halliday/RSK held a meeting on the 3rd July to further discuss the project and potential viewpoints and seek agreement on the selection. Stephenson Halliday/RSK subsequently provided follow up email correspondence on 17th July 2023 which contained meeting minutes (from the 3rd July), proposed final list of viewpoints spreadsheet, plan of the location of the final proposed viewpoints, ZTVs of the solar PV development, and ZTVs of siting zones for infrastructure of various sizes including the National Grid and project substation. AAH on behalf of Lincolnshire County Council (LCC) and North Kesteven District Council (NKDC) have subsequently reviewed the information and provide comments as follows:

1. The meeting minutes provided by Stephenson Halliday/RSK from July 3rd provide an accurate reflection of the conversation held;

2. The viewpoints proposed by Stephenson Halliday/RSK in the email correspondence on 17th July 2023 provide a good spread of representative views that is proportional to the project and extent of potential visual receptors. At this stage no additional viewpoints would be required, however if the development layout and design parameters change from that currently presented, additional viewpoints may be required;

3. All viewpoint photography should be taken in accordance with *LI TGN 06/19: Visual Representation of Development Proposals*. To ensure transparency of the assessment process and reduce queries as to potentially downplaying effects, photography locations should be micro sited to safely provide the most advantageous unobstructed view of the site and proposed development which should be presented centrally to the view, be taken on clear bright days away from the sun to avoid dark images, and be clear of isolated obstructions within the view such as cars or wayward branches/vegetation etc.

4. Regarding any potential AVRs of the viewpoints that would be identified at the next stages, it would be beneficial to discuss and understand the rationale on selecting these: such as on a view by view basis or an approach as to where those that are expected to have significant or cumulative effects. We would also recommend the selection, level and type of visualisations are discussed and agreed through consultation;

5. The proposed 3km study area is appropriate from the solar PV development and 5km from the National Grid and Project Substation and National Grid connecting towers. However, the LVIA should clearly state the justification for these study areas, and thoroughly assess and confirm no significant views are available from beyond the study area. Also, as it is not confirmed as to whether the National Grid Substation and National Grid connecting towers are to be included within the redline boundary, and if so both the final location and design of these elements, and the Project Substation, is yet to be confirmed, therefore while every effort has been made to accommodate this with the viewpoint selection, additional viewpoints and extension of the 5km study area may be required subject to confirmation of these aspects.

6. In regards to landscape character areas in the North Kesteven Landscape Character Assessment, we agree that LCA 11 Central Clays and Gravels and LCA 7 Limestone Heath would form part of the baseline, and would likely be directly affected by the proposed development. LCA 6 Lincoln Cliff and LCA 13 Fenland sit to the fringes of the proposed study areas, and are unlikely to experience significant effects and subsequently are acceptable to be scoped out, however we would recommend these LCAs are identified in the LVIA, and if scoped out a brief statement is provided that recognises their proximity to the red line boundary and the rationale as to why they have been scoped out.

We are available to discuss these points, as well as the evolving scheme and pertinent information, such as LVIA methodology, as required and welcome a continuing dialogue and consultation with Stephenson Halliday/RSK on the project.

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15 August 2023

AAH consultants

Technical Memorandum 4 (AAH TM04)

Lincolnshire County Council and North Kesteven District Council, Springwell Solar: PEIR Landscape and Visual Comments

Introduction

AAH Consultants have reviewed the Springwell Solar Farm: *Preliminary Environmental Information Report* (**PEIR**), on behalf of Lincolnshire County Council (**LCC**) and North Kesteven District Council (**NKDC**), in relation to Landscape and Visual matters. Information downloaded from: www.springwellsolarfarm.co.uk and the documents that have been referenced, are as follows:

- **Preliminary Environmental Information Report Volume 1**
  - Chapter 1: Introduction
  - Chapter 2: Description of the Proposed Development
  - Chapter 3: Reasonable Alternatives Considered
  - Chapter 4: Approach to EIA
  - Chapter 6: Biodiversity
  - Chapter 9: Landscape and Visual
  - Chapter 12: Traffic and Transport
  - Chapter 14: Glint and Glare
  - Chapter 15: Cumulative Effects
- **Preliminary Environmental Information Report - Volume 2: Supporting Figures:**
  - Chapter 1
    - Figure 1.1 – Location Plan
  - Chapter 2
    - Figure 2.1 Environmental Features Plan
    - Figure 2.2 Site Boundary
    - Figure 2.3 Zonal Masterplan
    - Figure 2.4 Indicative Height Parameter Plan
    - Figure 2.5 Indicative Green Infrastructure Parameter Plan
    - Figure 2.6 Indicative Operational Access and Movement Parameters Plan
    - Figure 2.7 Indicative Cable Route
    - Figure 2.8 – Indicative Construction Compounds
    - Figure 2.9 – Indicative Construction Accesses Parameter Plan
  - Chapter 3
    - Figure 3.1 – Environmental Considerations
    - Figure 3.2 – Solar PV Design Development
  - Chapter 6
    - Figure 6.1 – Local Wildlife Sites
  - Chapter 8
    - Figure 8.1 – Non-designated heritage assets
    - Figure 8.2 – Designated heritage assets
    - Figure 8.3 – Sensitive Heritage Receptors
  - Chapter 9
    - Figure 9.1 – Landscape Study Area, Context and Designations
    - Figure 9.2 – Landscape Character
    - Figure 9.3 – Visual Receptors
    - Figure 9.4 – Viewpoint Location Plan

    - Figure 9.5 – Solar PV Standard ZTVs
    - Figure 9.6 – Solar PV Detailed Screening ZTV
    - Figure 9.7 – Siting Zone 6m ZTVs
    - Figure 9.8 – Siting Zone 12m ZTVs
    - Figure 9.9 – Residential Property Location Plan
  - Chapter 10
    - Figure 10.1 Agricultural Land Classification Survey
  - Chapter 11
    - Figure 11.1 Baseline Noise Locations
    - Figure 11.2 Receptor Locations
  - Chapter 12
    - Figure 12.1 Local Roads
    - Figure 12.2 Accident Severity
    - Figure 12.3 Sensitive Receptors
  - Chapter 15
    - Figure 15.1 – Cumulative Long-List Radius
- **Preliminary Environmental Information Report - Volume 3: Supporting Reports:**
  - Chapter 1
    - Appendix 1.1 – Glossary and Abbreviations
  - Chapter 4
    - Appendix 4.1 – EIA Scoping Report
    - Appendix 4.2 – Scoping Opinion from PINS
    - Appendix 4.3 – Scoping Opinion Response Matrix
  - Chapter 9
    - Appendix 9.1 LVIA Methodology and Assessment Criteria
    - Appendix 9.2 Extracts from Published Landscape Character Assessments
    - Appendix 9.3 Landscape Sensitivity Appraisal
    - Appendix 9.4 Preliminary Viewpoint Analysis
    - Appendix 9.5 Preliminary Residential Visual Amenity Assessment
  - Chapter 15
    - Appendix 15.1 – Longlist of other developments
- **Preliminary Environmental Information Report - Volume 4: Landscape Viewpoints:**
  - Viewpoints 1 to 14
  - Viewpoints 15 to 20
  - Viewpoints 21 to 38

The review takes into account previous AAH comments (Refer to Springwell Technical Memos *AAH TM01*, *AAH TM02* and *AAH TM03*), as well as meetings/workshops held with the Applicant team and any subsequent meeting minutes. The comments provided are intended to assist in guiding the next stage of the development process, refinement of the content of the LVIA chapter and the overall development proposals. It is not a final review of any of the preliminary findings or initial assessments.

PEIR Landscape and Visual Comments

A. Main Overarching Comments on the PEIR:

1. The proposed development is subject to EIA, and a Scoping Report was issued by the developer: *Springwell Solar Farm Scoping Report* 21st March 2023*,* prepared by RSK*,* which contained a section on Landscape and Visual*.* Subsequently, a Scoping Report Review was carried out by LCC (20th April 2023) and NKDC (19th April 2023) which were appended to the *Scoping Opinion* issued by PINS dated: 02nd May 2023. Overall, the landscape and visual elements of the PEIR and subsequent scope of the LVIA chapter is generally aligned with the scoping report and scoping opinion, as well as other AAH comments (*AAH TM01, AAH TM02* and *AAH TM03*), and meetings/workshops held with the Applicant.

2. Para. 2.1.9. of the PEIR clarifies that the *"National Grid Navenby Substation and National Grid connecting towers no longer form part of the Proposed Development".* Therefore, the PEIR has accounted for a grid connection corridor to this National Grid Substation, and subsequently the site boundary has been amended since the scoping opinion and report were issued, however the PEIR states that the *"Proposed Development remains materially the same"* than that subject to the scoping opinion. Para. 2.1.10. goes on to clarify further that the National Grid substation is *"not now proposed to form part of the Springwell DCO application and consent",* and will be applied for separately.

   However, as these elements are interdependent and operationally 'indivisible' from the scheme as well as currently planned to be in close proximity, we expect the LVIA will incorporate a **cumulative assessment** (PINS advice note 17) of the scheme along with the National Grid Substation in the northern area of Springwell West. Viewpoints have been identified previously in an attempt to ensure these potential cumulative views are captured, however these should be reviewed if more information becomes available.

3. As outlined within Chapter 1 (para. 1.14), the PEIR *"does not represent the final design"* and Chapter 2 of the PEIR clarifies that the development proposals are still being developed and finalised. This includes the type of PV panel and location of taller/larger elements such as project substations, satellite collector compounds and battery storage. While it is understood that some aspects of the scheme cannot be confirmed at this stage as they would be dependent upon individual contractors selected at the tender stage (para. 2.1.3) we would expect a reasonable design fix for the final ES and subsequent application which would clearly set out the parameters of the development, such as heights and locations of elements that have been used in the assessment, which if there are still some outstanding design and layout elements to be finalised would be based on a '*worst case*' scenario to ensure any effects are not underplayed. This is particularly important for larger and taller elements.

4. It is requested that further landscape and visual consultation is carried out between AAH/LCC/NKDC and the Applicant following the conclusion of this second formal consultation phase. This would likely cover the PEIR comments as well as development proposals and mitigation scheme, including any cable route corridor and location of any larger structures or buildings such as the project substation, extent of vegetation loss for highways works, and also subsequent knock-on effects such as any requirement for additional viewpoints or visualisations.

5. Notwithstanding other comments made on the overall scheme, Springwell West is likely to be of particular concern in regards to landscape and visual matters, being located within a much more open landscape with development currently illustrated in close proximity to visual receptors (particularly the A15). We have briefly summarised what the NKDC LCA 2007 says about the Limestone Heath/A15 area 'baseline' for consideration (paragraph refences provided):
    - Utility Infrastructure, which although sparse, makes an impact on the landscape including prominent pylons and the main A15 running north to south. (8.1)
    - The ridges and dips run in an east-west direction following shallow 'dry' valleys, and this is particularly apparent when travelling along the A15 which falls and rises with the topography (8.1.3)
    - There are extensive 360° views throughout the sub-area afforded by the generally low relief, large field size and absence of field boundaries. The sense of relative elevation is obvious and the general lack of tree cover or other features accentuates the feeling of exposure and emptiness. (8.1.3)
    - Obtrusive infrastructure elements are present in the two lines of large pylons and high voltage electricity cables running across the landscape to the eastern fringe of the area and also across its south-west quadrant. (8.1.11)
    - The road pattern is distinctive with the straight main road (A15) running from north to south (Lincoln to Sleaford) dividing the character sub-area in two and acting as a central communications spine (8.1.14)

B. Detailed Comments on PEIR Volume 1: Report:

1. In regards to the landscape and visual matters of the design proposals (**Chapter 2 of Volume 1**), comments are as follows:
    - As stated in previous correspondence (refer to *AAH TM02*), at this stage, we do not have details on the final location and appearance/extent of taller/larger elements that form part of the development. However, Para 2.3.2 clarifies that *"it is the Applicant's intention to use the 'Rochdale Envelope' approach within parameter ranges"*. This is a reasonable approach and has been utilised recently on other NSIP solar schemes within Lincolnshire, with the scheme design accommodated within certain limits and parameters, allowing for flexibility and likely significant effects to be presented as a reasonable *'worst case'*.
    - However, while the '*Rochdale Envelope'* approach is reasonable for the PV panels, which are identified within Table 2.1 as being up to 3.5m high except in areas of flood risk which will be at 4m AGL, we have concerns in regards to the larger and taller elements, such as project (or '*Springwell*') substation and associated offices and structures (up to 12m in height), switchgear (up to 6m in height) Collector Compounds (up to 6m in height), BESS (up to 6m in height) and more conspicuous elements. The final location and layout of these elements will likely have greater visual effects in this open, rural landscape than PV panels.
    - Therefore, we would expect the location and '*worst case'* extent (footprint or extent of layout) of these elements to be identified clearly within the ES and submission documents, through works plans and/or parameter plans, and clearly identified for the LVIA to allow for a better understanding of the potential landscape and visual effects, and ZTV figures produced on the worst-case parameters.
- Section 2.8 provides further detail on the project substation, with the potential locations presented in Figure 2.3 showing the area to the north west of '*Springwell West'*. The location of this large element (Table 2.5 identifying the compound at approximately

62,500m² with a height up to 12m AGL) is in a relatively open landscape and its positioning, detailing and subsequent secondary mitigation will need careful consideration. However, through working with the Applicant on viewpoint locations we have pre-empted this and selected viewpoints to cover this area for any visual assessment. However, subject to the final location and any changes to the design parameters, additional viewpoints may be required. We would welcome further discussion in regards to the siting of this element as designs progress.

- Regarding Overhead/ground lines: Could it be clarified if any above-ground lines and associated poles are proposed. Paragraph 2.9.18 identifies some cabling above ground (between modules and inverters) on site, and further detail would be required to understand the potential visibility of these.

- Regarding fencing and security (paras. 2.10.1 to 2.10.8), the use of palisade fencing should be avoided or minimised in favour of less visually intrusive fencing where possible. Deer-proof fencing up to 3m in height is identified in Table 2.8 to be installed around operational areas, however experience has shown that operational areas often require weld mesh security fencing (or similar) which can be much more visually intrusive than deer-proof fencing, and can be more '*urban*' in character affecting rural characteristics of the existing landscape character. While we understand the fencing height of 3m is the maximum, this is a relatively high fence and we would seek for the maximum height to be reduced to be closer to 2.4m maximum, or lower if possible.

- Paragraph 2.10.5 identifies pole mounted CCTV at a maximum height of 5m. These elements, at regular spacing around perimeters can appear quite jarring, being out of character and the regular spacing appearing incongruous with a more natural context, being a regularly repeating element appearing above boundary hedgerows. We would welcome proposals that would reduce the height and spacing of these features, and encourage design solutions and locations that would be less visible.

- Regarding above ground drainage features (drainage covered in paras. 2.10.9 to 2.10.14), these should be utilised to be as multi-functional as possible while embodying SuDS principles, coordinating their design between civil engineers, ecologists and landscape architects to exploit opportunities for additional habitat creation, as well as surface water retention.

- Regarding vegetation loss:
  - The extent of any vegetation loss to facilitate construction access or permanent site access points identified in paragraphs 2.10.16 to 2.10.19, is not identified at this stage. Also, any vegetation loss to facilitate any potential wider highways works for construction traffic, abnormal loads, plant and deliveries, is not identified. We would expect this to be coordinated with the transport assessment and any associated swept path analysis or sight line requirements and all vegetation works, including removal or pruning/trimming/crown lifting etc. to be clearly illustrated and included within any assessment as this has the potential to remove existing features (that make up the character area) and open up views into or across the site.
  - Existing breaks in field boundaries should be utilised for both construction and permanent access to minimise vegetation loss. Vegetation removal to facilitate sight line or swept path requirements should be clearly identified, and again minimised where possible.

- We would expect any proposed vegetation removal to be surveyed to *BS:5837 Trees in Relation to Design, Demolition and Construction to Construction* so it is clear what the arboricultural value is (to aid assessment) and subsequently is appropriately mitigated against if required. Retained vegetation should also be protected to *BS:5837* and full details provided.

- We welcome and encourage the development of recreation and amenity improvements and Green Infrastructure as part of the scheme, and these elements should be maximised where possible and expect this to be integrated into the entire scheme, rather than token elements that are bolted or added on to the peripheries. A continued dialogue with LCC and NKDC, as well as other interested parties in regards to these parts of the scheme is encouraged.

2. In regards to the landscape and visual chapter (**Chapter 9 of the PEIR**):

- Para. 9.1.3 clarifies that Chapter 9 is a preliminary assessment, due to insufficient information at this stage, which we would expect as this is an evolving and iterative process. The preliminary assessment is therefore based on the current parameter plans (Figures 2.4, 2.5 and 2.6 of Volume 2) and that *"a full LVIA will be presented in the subsequent ES based on the proposals comprising the DCO application."*. We request that the LVIA is explicit in regards to the development proposals it is assessing, and that the parameters are clearly defined in regards to the size/height/footprint, but also the location of both built elements and mitigation areas are fixed through parameter or works plans. These should subsequently be reflected on any visualisations or ZTV figures.

- Para. 9.2.2 identifies that consultation in relation to landscape and visual matters has been carried out, and AAH/LCC/NKDC have held meetings and workshops with the Applicant, summarised in table 9.1. Table 9.1 provides a narrative on discussions regarding viewpoints to be included within the assessment, and clarifies *"Annotated baseline photographs from the agreed viewpoints are presented in Volume 4 of this PEIR".* It is requested that further landscape and visual consultation is carried out between AAH/LCC/NKDC and the Applicant following the conclusion of this second formal consultation phase.

- Paras. 9.2.8 to 9.2.17 identify the extent of the preliminary assessment Study Area of 3km from Solar PV areas to 5km from any structures up to 12m in height. A narrative and justification of the study area is provided which is reasonable. Para. 9.2.16 clarifies that the study area will be reviewed at the ES stage, which we encourage and recommend that the LVIA Chapter should include a clear statement on the justification for the extent of the final Study Area used.

- Relevant planning policy at paragraph 9.3.2 should be updated in the DCO submission to reflect the adopted 2023 EN1, 3 and 5 Statements which came into effect on 17th January 2024. CLLP policies S53 'Design and Amenity' and S59 'Green and Blue Infrastructure Network' are not included at paragraph 9.3.3 and should be added.

Methodology:

- The methodology is provided in Section 9.4, with para. 9.4.10 clarifying that the preliminary assessment has assumed a 'worst case scenario' with solar modules at 4m in

height and a siting zone for elements up to 12m in height: *"the assessment assumes that development could be 12m in height anywhere within this zone".* Para. 9.4.11 goes on to clarify that other elements such as the BESS, Collector Compounds and Springwell Substation are included within potential siting zones, as illustrated in Figure 2.3: Zonal Masterplan, and the assessment assumes that these elements may be in any part of each zone. This provides a robust and clear approach to assessing the '*worst case scenario'* in both location and height in the absence of detailed design layouts, and we assume this approach will be carried forward to the LVIA.

- With reference to paragraph 9.4.14 the applicant should justify the choice of buffer/stand off zones and whether this is set out in guidance, good practice, precedent from other NSIP solar projects or professional judgement or a combination. The Council raises concerns at this stage regarding the suggestion of new landscaping (where appropriate) being proposed within 15m either side from existing or proposed PROW if newly planted hedgerows are then maintained at 3.5m high by ongoing management, and which might appear overbearing (pending ongoing detailed design).

- Paragraphs 9.4.15 to 9.4.44 provide an overview of the methodology, which is further detailed in Appendix 9.1. Further comments are provided on the proposed methodology under the Appendix 9.1 heading below.

<u>Identification of receptors and potential effects:</u>

- The PEIR identifies a range of landscape and visual receptors within the Study Area. The visual receptors and viewpoints were previously discussed with AAH/LCC/NKDC, as were the potential locations of viewpoints. Table 9.2 presents receptors that are proposed to be scoped out of the assessment, along with a narrative on the justification for this. This list seems reasonable, as do the justifications. However, we recommend this information is presented in the final LVIA to aid transparency, and the justifications will allow for understanding of interested parties that these elements have been considered as part of the assessment process and why they have not been brought forward to the assessment. This is particularly important for the view from villages/hamlets identified to be scoped out, despite the ZTV information presented on Figures 9.5 to 9.8, which illustrates potential visibility.

- National Character Areas (NCAs) and District Landscape Character Types (LCTs) and subsequent Landscape Character Areas (LCA) have been identified and referred to within the PEIR which cover a range of scales. We agree that there is the potential to scope out character areas that would not be affected by the development, however a clear statement as to why these have been judged to omit should be provided in the LVIA. We would not expect that National Character Areas be a receptor to be assessed as they are at a large scale and typically provide context only.

- Only two potential landscape receptors are identified for consideration in the LVIA within with para. 9.5.9 identifying: "*Springwell West and Springwell Central fall within LCA 7 - The Limestone Heath LCA whilst Springwell East falls within LCA 11 - The Central Clays and Gravels LCA."* Will the LVIA include a more local assessment? We would suggest a finer-grained character assessment is carried out and identification of individual elements or features of the landscape character areas to form the baseline.

- In regards to landscape effects, the scale or size of a character area should not be a determining factor in assessing effects. We would urge caution in regard to larger landscape character areas, which often are assessed as having limited magnitudes of change as the change would be small scale and/or extent (development site) would only affect a small percentage of the overall, much larger, character area. We would encourage the LVIA assess what the change would be in that part of the character area and what identified key elements identified within the character areas are impacted, and how development change would affect those.

- It would be useful to take into account the information collated as part of the Historic landscape characterisation project: *The Historic Character of The County of Lincolnshire (September 2011)*, to ensure that the development is sensitive to the historic landscape. The project documents and the mapping can be accessed here: Historic Landscape Characterisation – Lincolnshire County Council

- Paras. 9.5.15 to 9.5.31 describe the visual receptors to be included within, and those that are scoped out of, the assessment. These are clearly summarised and listed within Table 9.8, which also provides information on judgements of sensitivity and value. Thirty-eight viewpoints have been identified that represent the main landscape and visual receptors. The receptors and viewpoints represent those discussed and agreed to date with AAH/LCC/NKDC, however as the design is still evolving, we would suggest this dialogue continues to pick up on any changes, which may necessitate additional viewpoints or scoping in of additional receptors. Further comments on viewpoints and photography are made below.

- The Approach to mitigation and residual effects in the LVIA, outlined in paras. 9.6.8 to 9.6.12 is appropriate, and we would encourage multi discipline coordination and synergy of disciplines (e.g. heritage, ecology, civils and landscape) to provide multi-functional spaces that not only mitigate adverse effects but has the potential to enhance to local landscape (as outlined in section 9.7). AAH/LCC/NKDC are available to provide input into the process of developing mitigation as required.

- With reference to Table 9.8, additional information and justification should be provided for the B1188, B1191 roads (which are assessed as 'medium' susceptibility and sensitivity) and the A15 (which is defined as 'low'). Table 9.3 states that *"a large volume of traffic passes along these two roads which have a largely open view across part of the Site. Receptors are generally not of high sensitivity but the views are likely to be experienced by large numbers of people from these two roads"* (B1191 and A15). The A15 should therefore be reclassified, having open views across the landscape from a high number of receptors, and therefore receptors more susceptible to changes in view. On this basis the Council does not currently support the conclusion set out in Table 9.9 which suggests moderate/minor changes and no significant effects.

- The development would be set close to receptors on the A15, and located within an open landscape, and therefore conspicuous in the view, and subsequent established mitigation planting that is intended to screen proposals would likely foreshorten views, which would be a conspicuous change to the baseline. The mitigation solution along the A15 needs to be fully considered, and a balance struck between screening and integration, while respecting open views and the wider landscape character. We understand that continued

consultation with the local community is ongoing in regards to this, which is encouraged and we would welcome the opportunity to input into the final mitigation solutions. However, it is assumed that there is subsequently an error in Table 9.10 with reference to the A15 given that the operational phase assessment, with mitigation, assumes a substantial/moderate/significant effect, but assume this would be clarified following the final layout and mitigation solutions.

- Table 9.9 and Table 9.10 provide an initial assessment of likely effects at construction, operation (year 1 and year 10) and decommissioning. The layout of these tables provides a clear and accessible summary of the assessment process and the judgements made by the author. However, as the scheme is still being developed, we have not provided detailed judgements against all these preliminary findings. Though, by reason of its mass and scale, our opinion is that the scheme would likely lead to significant adverse effects on landscape character and visual amenity at all phases of the scheme. The Development has the potential to transform the local landscape by altering the character on a large-scale. This landscape change also has the potential to affect wider landscape character, by replacing large areas of agricultural or rural land with solar development, affecting the current open agricultural character.

C. Detailed Comments on PEIR - Volume 2: Supporting Figures (Chapter 9 LVIA):

1. Generally: Figures associated with the landscape and visual chapter are well presented and read well.

D. Detailed Comments on PEIR - Volume 3: Supporting Reports (Chapter 9 LVIA):

Review of Appendix 9.1 LVIA Methodology and Assessment Criteria

1. The methodology, overall, is commensurate to what we would expect to be used to assess landscape and visual effects of the proposed development.

2. Pg 3 provides an overview of the assessment of Landscape effects. This identifies that the baseline should include both *Landscape fabric/elements*; and *Landscape key characteristics*. This information should be clearly presented within the LVIA, and would expect that as well as published character assessments, a finer-grained assessment be carried out and identification of individual elements or features of the landscape character areas to form the baseline to understand how these may be affected by the development. However, if the applicant judges the published character assessments provide this information, it should be clearly stated within the LVIA, but we would still expect the key elements of the landscape be identified as part of these overall receptors.

3. Pg 9 and 10 provide narrative on the Significance of Landscape and Visual Effects, and we support the approach that effects classified as '*Major or Major/Moderate'* are likely significant effects and that for '*Moderate*' effects, professional judgement will be applied. However, where Moderate effects have been deemed '*not significant*' we request a brief narrative accompanies the judgement to allow for transparency as typically effects of this magnitude are deemed *'significant'*.

4. Visualisations are shown as Type 1 in the PEIR. We recommend further consultation to agree the number (location) and Type of Visualisations to be included within the LVIA that would

be most appropriate to illustrate the proposals. We will expect there to be a number of Type 3 and possibly Type 4 visualisations provided within the LVIA and ES – these will be important to illustrate the scheme and the effectiveness of any mitigation, particularly to members of the community. A clear Visualisation Methodology should also be included. This should provide full details/parameters of the elements that have been modelled (Solar arrays, substation etc.) for transparency of what is being illustrated, and enable this to be referenced against the 'worst case' design parameters (e.g. if shown at maximum heights, or lower than maximum provided in design parameters).

Review of Appendix 9.2 Extracts from Published Landscape Character Assessments:

5. No further comments on the published landscape character assessments at this stage.

Review of Appendix 9.3 Landscape Sensitivity Appraisal

6. No comments on the Landscape Sensitivity Appraisal at this stage, however we refer back to our previous comments regarding the landscape baseline only covering the two relevant published LCA, however "*observations made in the field during the baseline assessment of landscape character"* is noted as included within the baseline assessment of sensitivity.

Review of Appendix 9.4 Preliminary Viewpoint Analysis

7. No further comments on the Preliminary Viewpoint Analysis at this stage.

Review of Appendix 9.5 Preliminary Residential Visual Amenity (RVA)

8. With reference to RVA:
   - Tables 9.9 and 9.10 note that for *'Individual/ Isolated Residential Properties'*, and adopting a '*worst case'* scenario, at this stage it is assumed that there may be up to a substantial magnitude of change at a small number of individual isolated properties potentially give rise to a significant effect even after mitigation. These properties should be clearly identified on submitted plans and addressed in the ES chapter.

   - The Appendix 9.5 Preliminary Residential Visual Amenity Assessment makes reference to a figure 9.11, however it is assumed that this is actually figure 9.9. The Appendix 9.5 RVA states that there is no standard criteria for defining a RVAA study area and this is determined on a case by case basis. It quotes TGN 02/19 guidance which states that *"other development types including potentially very large but lower profile structures and developments such as road schemes and housing are unlikely to require RVAA, except potentially of properties in very close proximity (50-250m) to the development."*

   - Figure 9.9 then illustrates a study area drawn from TGN 02/19 guidance which identifies properties within 200m of any Solar PV development; 400m of any siting zones for structures up to 6m and 800m from any siting zones for structures up to 12m (i.e. including the siting zones for the project substation). Table A9.5-2 '*Preliminary Analysis of Residential Properties within RVVA Study Area'* then sets out initial observations of impact for 23 properties or grouped properties based on the application of the 200m/400m/800m buffer and siting zones.

   - However, cross reference to the Heckington Fen solar NSIP 'Volume 1: Technical Chapters Chapter 7: Residential Visual Amenity' notes that an initial 1km area from the order limit boundary was adopted. Paragraph 7.5.1 of that document notes that design mitigation

measures included providing increased physical separation from nearby residential properties to the closest panelled areas (initially located 200m from the receptor) to *'avoid the risk of failing the so-called 'Lavender* Test'. With one exception (separation distance of 140m to panelled areas), the closest panelled areas at Heckington Fen are now no closer than between 240m-270m to the nearest residential property (NKDC Local Impact Report – paragraph 13.9).

- Whilst it is accepted that each case must be assessed on its own merits, the Council is concerned that the draft RVA has adopted a much narrower assessment buffer, down to 200m, than initially presented at Heckington Fen. There is nothing in the draft RVA which makes the link between the TGN 02/19 guidance, solar development and the Springwell project. The examples given in the TGN 02/19 guidance are for road and housing projects. We accept that the guidance cannot be exhaustive however these proposals are of a significantly greater scale and footprint that the examples given in the guidance note and as set out in the Councils scoping response a concern here is the degree to which certain properties or zones might have limited visual relief from the development; even with the amendments to the zonal masterplan and the buffer adopted.

- Noting the minimum separation distance of the bulk of residential property at Heckington Fen, there are a number of properties confirmed through the Springwell RVA and Figure 9.9 which are less than (or on the cusp of) 200m from the closest panelled areas. Some are much closer, namely 1 & 2 Peacock Lodge Cottages, Tollbar Cottage, Lupus Lair, 1-2 Ashby Lodge Co□age, Sheffield House, Scopwick Low Field Farm, Brickyard Farm and RAF Digby Mallory Road.

- Table A9.5-2 'Preliminary Analysis of Residential Properties within RVVA Study Area' proposes to scope out assessment on 6 of the 23 named properties/groups of properties however this is on the basis of initial assessments whose detail is not presented in the draft document. This could have included images and close up mapping extracts where necessary annotating the layout of dwellings, the direction of outlooks, location of existing landscape filters etc. Therefore, from the information presented the Council cannot yet agree that these properties should be scoped out, and as above there remain a large number of properties at closer physical proximity/with lesser separation that at Heckington Fen which as above typically achieved a 250m-270m separation and where the TGN 02/19 guidance gives an outer range of 250m albeit for road and housing projects.

E. <u>Review of Volume 4 - Landscape Viewpoints:</u>

1. Thirty-eight viewpoints have been identified and presented that represent the main landscape and visual receptors. The receptors and viewpoints represent those discussed and agreed to date with AAH/LCC/NKDC, however as the design is still evolving, we would suggest this dialogue continues to pick up on any changes, which may necessitate additional viewpoints or scoping in of additional receptors.

2. The photographs presented are clear, well labelled and the indication of siting areas aids legibility. The legibility is aided with colour coding of the three different Springwell areas (West, Central and East). This would be useful to carry through to the LVIA.

3. VP30: View may provide more indication of visibility of elements up to 12m in height in siting area if either rotated to the right, or if extended (additional sheet) to capture more of the western extents. These are potentially large components, and the context would also be useful to include within the view.

4. VP31: While a long-distance view, this viewpoint is to towards the siting area – could this be labelled and also would an additional sheet to the left of the view be required to capture this? The potential height of 12m of these elements may be visible, as illustrated on the ZTV.

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19th February 2024

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Technical Memorandum 5: AAH TM05

North Kesteven District Council and Lincolnshire County Council: Springwell Solar Project

Visual Amenity: Final Viewpoint Comments

A meeting was held between representatives from AAH, Lincolnshire County Council (LCC) and North Kesteven District Council (NKDC) with the applicant on 19th June 2024, to discuss final viewpoint selection and photomontages. Following this, the applicant forwarded an email on 26th June with a list of proposed locations for photomontages, an updated ZTV, a plan of all proposed viewpoints and several additional alternative viewpoints for the final Springfield ES with a view to reach agreement.

Therefore, we have the following comments and requests:

1. The overall viewpoint selection is appropriate and we are happy with the viewpoints selected to be taken through to the LVIA chapter of the ES;

2. Viewpoint 30 may benefit from either being rotated to the right, or additional sheets to capture any cumulative views or the NG substation and BESS.

3. Regarding potential additional viewpoints J4 or J5, to the south west of the scheme and NG Substation: We would suggest taking viewpoint J5 through to the LVIA chapter of the ES as it provides a more panoramic view and may include cumulative views of the development alongside higher elements of the NG substation and proposed BESS to the north, and therefore suggest the view is either rotated or expanded to include views towards these elements. We also agree that a visualisation from this viewpoint would be useful;

4. We agree that Viewpoint J3 should replace Viewpoint 37;

5. Regarding Viewpoint J1, while we are generally in agreement that there are unlikely to be views of the scheme, it is likely that at the examination stage there would be queries in regards to views of the scheme, and in particular cumulative views with the NG substation and BESS scheme, so would suggest it is kept in the LVIA to clearly demonstrate this view has been considered.

6. Regarding proposals for viewpoints to be illustrated as Year 1 and Year 10 photomontages:
    A. We are generally happy with the selected views and these provide a good variety of views and location; however
    B. The views proposed are predominantly very close to panels, so would suggest that a couple of visualisations that are slightly more offset from the redline are provided to illustrate how the solar development will appear in the wider landscape. This would be particularly useful from VP 13 and 14 as these views are offset slightly and show a wider context, as well as capture views that are more sensitive in relation to heritage assets (edge of conservation area). VP 13 would likely benefit from the inclusion of views towards the settlement of Blankley and the church by rotating or adding an additional sheet.
    C. Viewpoint 27 has the potential to be developed as a visualisation as it shows a more panoramic, elevated longer-range view and several development parcels. However,

we would also suggest an additional sheet is provided that includes the coloured areas (as currently presented) demarking development as these provide an effective way of identifying development areas, which may appear as grey masses on any visualisations.

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10th July 2024

APPENDIX B

Landscape Institute Technical Guidance Note 1/20 (10 Jan 2020): Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)

Landscape Institute Technical Guidance Note

Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)

Technical Guidance Note 1/20 (10 Jan 2020)

The purpose of this guidance is to establish a framework for carrying out reviews of LVIAs and LVAs, analysing in a structured and consistent way if the assessment reflects the approach advocated in GLVIA3 and has led to reasoned and transparent judgements. Use of this framework should in due course further raise the standard of assessments

1. Introduction

The third edition of the *Guidelines for Landscape and Visual Impact Assessment* (GLVIA3) was published in April 2013. It has been widely welcomed, accepted and adopted for use in assessing the effects of projects on landscape and visual amenity and since publication been promoted by Landscape Institute (LI) training events.

GLVIA3 sets out that assessment of effects on the landscape and visual resource that may result from a development proposal may be undertaken formally as Landscape and Visual Impact Assessment (LVIA) typically as part of an Environmental Impact Assessment (EIA) or less formally as a Landscape and Visual Appraisal (LVA). The LI strongly recommends that GLVIA 3 is followed when undertaking these assessments and that the resulting LVIAs and LVAs should be objective with clear thinking, easy to follow, and demonstrate how they have informed appropriate siting, design, and mitigation.

The main difference between an LVIA and LVA is that in an LVIA the assessor is required to identify 'significant' effects in accordance with the requirements of Environmental Impact Assessment Regulations 2017, as well as type, nature, duration and geographic extent of the effect whilst an LVA does not require determination of 'significance' and may generally hold less detail.

In the case of LVIAs, The Regulations have further implications for landscape professionals:

- Reg. 18 (5) stipulates that the developer must ensure that the ES is prepared by '*competent experts'* and that the developer must include a statement "*outlining the relevant expertise or qualifications of such experts".*

- Reg 4 (5) places obligations on the relevant planning authority or the Secretary of State because they "…*must ensure they have, or have access as necessary to, sufficient expertise to examine the Environmental Statement."*

Note that the terms 'competent expert' and 'sufficient expertise' are not defined in the EIA Regulations. The Landscape Institute, in the absence of formal certification of specific competence, considers that a 'competent expert' would normally be a Chartered Member of the Landscape Institute who, has substantive experience of undertaking and reviewing LVIAs. This may be evidenced by the assessor's CV, by reference to previous assessments, and by endorsement by other senior professionals.

Following on from GLVIA3, which focusses on how to *undertake* LVIAs/LVAs, this document provides guidance on how to *review* LVIAs or LVAs prepared by others. Such review may be undertaken from within the organisation which produced the LVIA/LVA, e.g. as part of a QA process, or by third parties on receipt of LVIAs and LVAs, such as landscape and or planning professionals in public sector bodies.

This guidance sets out a framework for carrying out such reviews in a structured and consistent way that reflects the approach to assessment advocated in GLVIA3 and use of it should further raise the standard of assessments.

2. Existing advice and guidance

GLVIA3 Chapter 8, under the heading "Review of the landscape and visual effects content of an Environmental Statement", says:

"8.35 Competent authorities receiving Environmental Statements will often subject the documents to formal review of both the adequacy of the content and of their quality. The review process will usually check that the assessment:

- *meets the requirements of the relevant Regulations;*
- *is in accordance with relevant guidance;*
- *is appropriate and in proportion to the scale and nature of the proposed development;*
- *meets the requirements agreed in discussions with the competent authority and consultation bodies during scoping and subsequent consultations.*

8.36 The summary good practice points in this guidance should assist in review of the landscape and visual effects content of an Environmental Statement. In addition, several existing sources may also help anyone involved in reviewing this topic to decide what to look for:

- *IEMA has developed a series of general criterial for reviewing Environmental Statements and registrants for the EIA Quality Mark*[1] *must meet the criteria…*
- *The former Countryside Commission published criteria for reviewing the landscape and countryside recreation content of Environmental Statements…*
- *Appendix 1 of Scottish Natural Heritage's Handbook on EIA* [2]*contains useful tests to help judge the landscape and visual effects content of Environmental Statements…"*

In addition, European Commission guidance on ES review[3], published in 2001 and, although directed at whole ES review rather than topic specific review, has also provided useful pointers.

This review framework has been developed in this context.

[1] IEMA EIA Quality Mark, IEMA website: https://www.iema.net/eia-quality-mark [accessed 200110]

[2] Scottish Natural Heritage, A handbook on environmental impact assessment v5, 2018, SNH website: https://www.nature.scot/sites/default/files/2018-05/Publication%202018%20-%20Environmental%20Impact%20Assessment%20Handbook%20V5.pdf [accessed 200110]

[3] European Commission, Guidance on EIA-EIS Review, Luxembourg: Office for Official Publications of the European Communities 2001 ISBN 92-894-1336-0, EC website: http://ec.europa.eu/environment/archives/eia/eia-guidelines/g-review-full-text.pdf [accessed 200110]

3. Carrying out the review

There are three main components of a review of a LVIA or LVA leading to a report containing the overall conclusion in respect of the completeness, competency and reliability of the LVIA/LVA.

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

As a starting point when undertaking a review, the reviewer will need to define the structure and process to be followed by for example setting out a set of headings or questions against which the LVIA or LVA is examined. Setting out standard or systematic questions will allow consideration being given to each step and each element covered in the assessment. The "good practice" bullet points at the end of each chapter in GLVIA3, noted above, may provide a starting point for such an approach. It is also important to bear in mind the principle of proportionality (cf. EIA Directive). Both the LVIA (or LVA) and the Review should have a defined scope and level of detail which is proportionate and reasonable to allow an informed decision to be reached.

In order to improve consistency and quality of reviews of LVIAs and LVAs the Landscape Institute has produced this framework. Those who undertake reviews should follow this framework and modify or adapt the framework to the Review being carried out and set out the reasons for such modifications.

Step 1. Checking methodology, criteria and process

In this phase, the reviewer will check the methodology, scope and process used in the assessment and how these relate to GLVIA 3. This involves reviewing the following:

a) 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?
b) What consultations have been carried out and have responses been acted upon?
c) Has the scope and methodology of the assessment been formally agreed with the determining authority? If not, why not?
d) 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?
e) Does the assessment demonstrate a clear understanding and provide a separate consideration of landscape and visual effects?
f) Does the assessment demonstrate comprehensive identification of receptors and of all likely effects? and
g) Does the assessment display clarity and transparency in its reasoning, the basis for its findings and conclusions?

Step 2. Check the baseline, content, and findings of the assessment

As part of this stage in the review process the reviewer will consider the description of the baseline, both in narrative as well as in illustrations by plans, photographs and drawings etc. This may also include publicly available aerial photography, books, online resources, local plans and management plans.

The reviewer may also consider that a site visit may be necessary either to complement or to verify baseline information. The site visit and potential visits to viewpoints are also useful to check actual findings of the assessment.

This stage of the review typically includes further tests:

a) 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)?
b) 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?
c) Have the criteria to inform levels of sensitivity (both landscape and visual) and magnitude of change have been clearly and objectively defined, avoiding scales which may distort reported results?
d) How well is the cross-over with other topics, such as heritage or ecology, addressed?
e) Is there evidence of an iterative assessment-design process?
f) 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?
g) How appropriate are the viewpoints that have been used?
h) 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?
i) 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 EIA projects?
j) 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.?
k) Does the document clearly identify landscape and visual effects which need to be considered in the assessment? and
l) Have levels of effect have 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?

Step 3. Critique of the presentation of the findings of the assessment

This phase is perhaps the most straightforward. It involves examining the 'presentation' of the assessment including report text, figures/ illustrations, visualisations, and other graphic material forming the LVIA or LVA, and answering the following:

a) 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.
b) Have the findings of the assessment been clearly set out and are they readily understood?
c) Has there been clear and comprehensive communication of the assessment, in text, tables and illustrations?
d) 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?
e) Are the graphics and/or visualisations fit for purpose and compliant with other relevant guidance and standards? and
f) Is there a clear and concise summation of the effects of the proposals?

Overall Conclusion: Report the review

The final step of the review process is to use the reviewer's findings to draft a short report which would include (but need not be limited to):

1. Confirmation of the brief issued to the reviewer setting out the scope of the review;
2. A summary of how the review was undertaken);
3. A summary of findings of the review of the assessment methodology;
4. A summary of findings of the review of the scope of the assessment;
5. A summary of findings of the review of the actual assessment of effects;
6. A summary of findings of the presentation of the assessment;
7. A summary statement by the reviewer in respect of appropriateness, quality, comprehensiveness, compliance and conformity with relevant guidance and regulations;
8. Recommendations for further information to be sought (if necessary); and
9. Overall conclusions on the adequacy of the assessment and whether it is sufficient to support making an informed planning decision.

The report can also include further information not covered here but relevant to reporting on the compliance (or otherwise) of the LVIA or LVA with GLVIA3 or matters of competence or expertise. This guidance provides a summary framework for reviewing and reporting only; the Landscape Institute continues to regard GLVIA3 as the primary source of guidance for undertaking LVIAs and LVAs.

4. Further information

For further information or to provide feedback on the guidance in use, please refer to the Landscape Institute's website, using the search terms GLVIA. At the time of publication, material is likely to be found in the following section: https://www.landscapeinstitute.org/technical/glvia3-panel/

Authored by [redacted] on behalf of the GLVIA Panel and approved by LI Technical Committee
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