

CSAG Additional Landscape Note for Deadline 3

29th May 2026

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- 1.1 This *Additional Landscape Note* was produced after Deadline 3, for reasons which are explained below. CSAG hopes that the ExA will accept this late submission.
- 1.2 CSAG's Deadline 3 submission included a *Landscape Note* which summarised my position on landscape matters and oral submissions made at ISH1; and set out post-hearing submissions and CSAG's Deadline 3 responses to / comments on material submitted at Deadlines 1 and 2.
- 1.3 The latter included comments on the Applicant's Deadline 2 *Response to Written Representations* [REP2-086] where the responses referred to my *Landscape and Visual Report* ([REP1-127], Part 3 – Landscape and Visual), which was submitted at Deadline 1 as part of CSAG's WR.
- 1.4 Most of the landscape-related responses in [REP2-086] are in *Table 7-1: Landscape and Visual (including Design) (SoCG Parties)*.
- 1.5 This Note relates to item ref. **7.1.46**, where the Applicant responds to my comments about the LVIA's photomontages. The Applicant's response refers to the CGI I used to illustrate the concerns I have about the proposed fenced corridors crossing the site (in the absence of any in the LVIA, as noted in my *Landscape and Visual Report* and in the Deadline 3 *Landscape Note* at paras. 3.5 vi) and 7.21 – 7.24).
- 1.6 The Applicant's response states, '*The preparation and presentation of images using artificial intelligence (AI) is not acceptable in terms of the presentation of accurate visualisations accompanying professionally authored LVIAs. The AI images presented by CSAG are inaccurate in terms of corridor dimensions, location and design of fencing and security cameras and appearance of the landscape generally and cannot be considered as representative of actual views*'.
- 1.7 I do not have the expertise to create digital images and am not familiar with the techniques and processes, so whilst preparing my comments, emailed the person who produced the CGI to ask if they could comment on the Applicant's response.
- 1.8 Unfortunately, I did not receive a reply until just after CSAG's Deadline 3 documents had been submitted.
- 1.9 The CGI was created by a professional colleague (Chris MacDonald) who is an expert in this field, having produced computer-generated images (CGIs) for numerous proposed solar and other industrial-scale developments in rural locations (he also produced the CGI of a proposed solar development from the air on page 51 of my *Landscape and Visual Report*).
- 1.10 Both CGIs are part of a series commissioned in 2023 by a group opposing a proposed 49.9MW solar development in Worcestershire.

- 1.11 To begin with, Mr MacDonald is usually provided with high resolution photographs of the views which are to be the subject of the CGI, as was the case here.
- 1.12 His email explains as follows:
- "Well firstly I can clarify it isn't an AI image. No artificial intelligence was used to produce it whatsoever. In fact it was produced largely before AI was rolled out in the way we see today. It was entirely 3D modelled by myself in 3DS max, and rendered as an image with VRay.*
- "All of the locations of solar panels, fences, boundaries, etc were taken from the applicants PDF plans that were available on the planning portal...*
- "I used the National Lidar Programme data from the Environment Agency for levels information, and view positions."*
- 1.13 Regarding the fencing shown in the CGI, it is not the deer-proof type proposed by the applicant. Mr MacDonald was asked to show the type of security fencing recommended by the regional Police Designing Out Crime Officer in their response to the application, which stated (with added emphasis), 'I would **strongly avoid** the use of what is described as 'Deer Fencing' as this does not provide any difficulty or deterrent to the criminal... I would recommend that the boundary fence is to a minimum of LPS 1175 level 3 and to a height of 2.4 metres or to the current UK Government standard, SEAP (Security Equipment Approval Panel) class 1-3' (this matter is mentioned in para. A1.29 in Appendix CT-1 of my Deadline 3 Landscape Note).
- 1.14 Also note that the CGI includes the Applicant's proposed mitigating measures. The screening vegetation is shown as it would be during the early years of operation, whilst starting to establish. Mr MacDonald's CGI shows the species of tree and hedgerow plants proposed by the Applicant, as they would be at the same time of year as the photo was taken. He calculates their size for the CGI based on the species, size at planting, and other factors.