Lime Down
Solar Park

Applicant's Response to Stop Lime Down Written Representation Appendix B Landscape and Visual Report

May 2026

Revision 1

Planning Inspectorate Reference: EN010168

Document Reference: EXAM/9.27

The Infrastructure Planning (Examination Procedure) Rules 2010

1.1.1 This document has been prepared in response to Stop Lime Down Written Representation, Appendix B (Landscape and Visual Impact Report) (LVIR) **[REP1-170]**.

1.1.2 A number of 'clarification / information' requests have been made throughout the LVIR **[REP1-170]**. The Applicant notes these requests and intends to respond in detail in a subsequent submission.

1.1.3 The Applicant notes the concerns raised but does not agree that **ES Volume 1, Chapter 8: Landscape and Visual Impact (LVIA) [APP-060]** materially underestimates effects or departs from GLVIA3 guidelines. The assessment is supported by extensive consultation, iterative design refinement, detailed receptor-based assessment, additional visual testing and transparent professional judgement.

1.1.4 The **LVIA [APP-060]** has been undertaken with consideration of the appropriate and relevant guidance and robustly assesses both the landscape and visual effects of the Scheme independently to ensure both the impacts and effects on the fabric and character of the landscape are taken into account as well as views and visibility. The LVIA undertakes a transparent assessment of Value, Susceptibility and Sensitivity for all identified receptors which is then robustly assessed against the identified Magnitude of Change to conclude likely worse case level (Significance) of effects.

1.1.5 The LVIA fully and transparently acknowledges adverse effects to both Landscape Character and Visual Amenity as a consequence of the Scheme whilst also identifying embedded mitigation and long-term 'legacy landscape' restoration measures.

1.1.6 The **Design Approach Document [APP-268]** (DAD) demonstrates how good design has been embedded in the design of the Scheme and how the design of the Scheme has evolved up to the point of the DCO Application within a clear design framework provided by a Design Vision and Design Principles.
The DAD has been prepared in accordance with the Planning Inspectorate's guidance titled 'Nationally Significant Infrastructure Projects: Advice on Good Design' and sets out the design decisions taken at each step of the Scheme's development, and the rationale for these decisions, as well as the mechanisms by which good design will be secured post consent.

1.1.7 Design Principle 1 sets out how the Scheme is 'landscape led' and gives due weight to the intrinsic character and beauty of the surrounding countryside.

1.1.8 The design development of the Scheme recognises the need for careful siting, design and mitigation, and the importance of an iterative approach to design to ensure appropriate design solutions are reached. The Scheme has been designed to be sympathetic to local character and setting, helping to protect and enhance the landscape through the landscape- led design.

1.1.9 The nature of solar developments results in infrastructure being 'overlaid' across the landscape and reversable. For example, developments for mineral extraction fundamentally change the nature of the landscape in which they operate, whereas solar projects, with the exception of the footprint of the buildings, are 'overlaid' across the landscape with only the posts interacting with the landform. This allows the important landscape features such as hedgerows, trees and watercourses to remain and continue to contribute to the landscape character of the receiving area. The strong framework of existing vegetation across the Scheme as well as the rolling topography of the Hullavington Rolling Lowland would provide the structure for the Scheme to be set comfortably and not become wholly intrusive within the landscape. The existing vegetation also acts as a backdrop for the panels and helps them integrate into the countryside surrounding.

1.1.10 Section 4.2 of the **Design Approach Document [APP-268]** explains how the Scheme achieves positive design outcomes in the context of NPS EN-1 which states at paragraph 4.7.2:

1.1.11 *"Applying good design to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible."*

1.1.12 Section 4.2 of the **Design Approach Document [APP-268]** sets out the design measures that make the Scheme sustainable and sensitive to place, including integration with the landscape, enhancement measures and the creation of permissive paths. Section 4.2 of the **Design Approach Document [APP-268]** goes on to describe how the Scheme has been efficient in its use of resources and how its appearance demonstrates good aesthetic as far as possible.

1.1.13 The design of the Scheme has evolved in response to the outcomes of environmental assessment, stakeholder engagement, consultation feedback at non-statutory, statutory and targeted consultation, and technical studies, within a framework provided by a Design Vision and Design Principles which have sought to minimise adverse impacts, enhance opportunities, and balance flexibility and certainty in the DCO application.

1.1.14 The landscape led approach to the development has utilised the mitigation hierarchy to minimise adverse effects. Avoidance measures include avoiding development adjacent to the National Landscape where it would affect its setting and avoiding development where it would be visually intrusive and affect the character and visual experience of the landscape.

1.1.15 These measures are set out in Section 8.9 of the **LVIA [APP-060]** and includes:

- the avoidance of panels within the setting of the CNL in Sites A, B and C where there is a strong visual relationship between the CNL and the Scheme. This includes:
  - Site A: The northern part of A1, A11 and A12;
  - Site B: B12; and
  - Site C: C1, C6, C8, part of C9 and the majority of C10.
- Panels in C2, C3 and C4 which are not on the boundary of the CNL, but where significant visual effects on receptors within the CNL were recorded at PEIR were subsequently removed from the Scheme following Statutory Consultation.

1.1.16 Embedded mitigation measures principally comprise a range of offsets and buffers and specific landscape design parameters outlined in Tables 7 and 8 of Appendix 8-6. These include extensive offsets from existing PRoW, retention and enhancement of the existing landscape framework to gap up existing hedgerows and provide new tree lines to increase age and species diversity. The embedded mitigation also includes new planting to both mitigate the visual effects of the Scheme and provide landscape benefits including the re-establishment of historic hedgerows within the setting of the CNL, new areas of native woodland, trees, scrub and grassland, new planting within riparian corridors to enhance rivers and wetland, as well the restoration of dry-stone walls and creation of new/reestablishment of historic ponds.

1.1.17 Mitigation and enhancement measures are detailed in the **Outline Landscape and Ecological Management Plan (LEMP) [APP-283]** and the **Outline Ecological Protection and Mitigation Strategy (EPMS) [REP1-106]**, which set out habitat creation, species protection measures, buffer zones and long-term ecological management. The preparation, approval and implementation of the detailed Landscape and Ecological Management Plan, substantially in accordance with the **Outline LEMP [APP-283],** is secured through Requirement 7 in Schedule 2 of the **Draft Development Consent Order (DCO) [REP1-007].** The preparation, approval and implementation of the detailed Ecological Protection and Mitigation Strategy, substantially in accordance with the **Outline EPMS [REP1-106],** is secured through Requirement 8 in Schedule 2 of the **Draft DCO [REP1-107].** These requirements ensure that ecological protection and enhancement measures are delivered and maintained throughout construction and operation of the Scheme.

1.1.18 The **LVIA [APP-060]** acknowledges that there would be there would be an immediate change to the character of the Sites themselves and their immediate surroundings as they change from an area of arable farmland to solar infrastructure with the LVIA recording Significant Adverse effects on the character of the Landscape (including within the Lime Down Sites) through to the establishment of the Mitigation planting as a result of the Scheme and the

change from agricultural land to a solar infrastructure. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the landscape once operational, with the establishment of the landscape mitigation by Year 15 reducing adverse significant effects on Landscape Character and Visual Amenity. However, the LVIA recognises that as a consequence of the development there would be long term significant adverse effects to 10 Visual Receptors, all of which are local PRoW which are either within or directly adjacent to the proposed arrays.

1.1.19 The combined or Intra project cumulative effects have been robustly assessed in the **LVIA [APP-060]** and a **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]** was submitted at Deadline 1 to explain the assessment undertaken within the LVIA and to summarise the significant effects identified. Intra-project effects are distinct from the cumulative and in-combination effects considered for the Scheme.

1.1.20 Intra-project refers to the combined landscape and visual effects of each of Lime Down A-E, taken together to determine their effects as a whole. For example, where more than one site is visible to a receptor.

1.1.21 Cumulative effects are defined in paragraph 21.1.2 of ES Volume 1, **Chapter 21: Cumulative and In-Combination Effects [APP-073]**, which are where there is the potential for two or more developments that are reasonably foreseeable and/or consented, but not yet forming part of the baseline environment, within close enough proximity to the Scheme to lead to significant cumulative effects on the same receptor. Chapter 21 summarises the cumulative effects conclusions and these are considered at section 8.13 of **ES Volume 1**, **Chapter 8: Landscape and Visual [APP-060]**.

1.1.22 "In-combination effects" are also defined in paragraph 21.1.2 of **ES Volume 1, Chapter 21: Cumulative and In-Combination Effects [APP-073]**, and relate to how different types of effects from the Scheme have been considered (for example landscape and visual and noise effects together). These are assessed in Chapter 21.

1.1.23 The Technical Note concluded that the Intra Project Cumulative Visual Effects (the Visual Effects associated with the Scheme) were robustly assessed in the LVIA. For each visual receptor assessed, the visibility of the Scheme was identified firstly to the nearest Lime Down Site (Primary Site) and then secondly to the visibility of any other of the remaining Lime Down sites (Secondary Sites).

1.1.24 It concluded that for those visual receptors where Significant effects were recorded that in all cases, the effect of the Secondary site is less than the Primary Site and that when viewed in combination, effects are no greater than those identified for the Primary Site. This is predominantly due to the distance to the Sites or the fact that they are seen from a different location from the route (referred to a sequential visibility). As such, this would not increase the level of

effects above those described for the primary Site. Therefore, the Intra Project Cumulative Visual Effects are as identified for the primary Site. This is considered a consequence of the "disaggregated / disparate nature of the Lime Down Sites A to E" combined with the rolling character of the Hullavington Lowlands. As such, the assessment does not consider there to be a greater Cumulative Visual Effect for these receptors than for the assessment of the level of harm identified from the individual sites themselves.

1.1.25 The Scheme comprises a series of independent Sites set across an extensive agricultural landscape, with large areas of land between each of the Sites helping assist with assimilation. Each Site is set apart by their associated features such as robust hedgerows, woodland and tree cover, intervening settlements and the road and rail infrastructure and the changing topography. The discrete areas of land in the Scheme are placed so far apart that the Scheme would not be perceived in its entirety from any one location and the solar panels are distributed 'in and amongst' the landscape features to assimilate them into the landscape.

1.1.26 Additionally, the Applicant has prepared a **Technical Note on Sequential Visual Effects [REP1-123]** in which at the request of WC, the Applicant has provided an assessment of the sequential visual effects on the Fosse Way, the A429 and the A350 routes. Sequential Effects relate to the visual experience of recognised routes and occur when the observer has to move to another location to see different developments.

1.1.27 This Technical Note confirms that no additional Significant Adverse Sequential Effects (above those identified within the **LVIA [APP-060]**) on the amenity of users of the Fosse Way have been identified, and that whilst the individual Cumulative Development Sites (CD Sites) could result in adverse effects in localised views from the A429 / A350 that given the limited visibility of the Lime Down Scheme in views from the A429 combined with its separation to the A350 by the M4 motorway and the distances between the CD sites and Lime Down, the sequential visual effects associated with the Scheme on the users of the A429 / A350 (Receptor TR004-TR007) would be no greater than those identified in the LVIA.

1.1.28 A further **Technical Note on Landscape Fabric and Landscape Character [REP1-121]** was submitted alongside the **Applicant in response to Relevant Representation response [PDA-009]** to respond to point **[RR-4934].** Although the Methodology of the LVIA is agreed with Wiltshire Council (WC), there appears to be a degree of misunderstanding of the findings of the LVIA especially relating to Landscape Fabric and land use change. The Technical Note provides clarification on the Methodology used in the LVIA to assess the effects of the Scheme on Landscape Fabric and Landscape Character and clarifies that the assessment on Landscape Fabric is an independent and

separate assessment to that undertaken on the effects of the Scheme on Landscape Character.

1.1.29 The LVIA assesses the landscape fabric of the site and landscape character separately. The assessment on the landscape fabric focuses on the impact upon the site itself in terms of vegetation loss and gains. The LVIA also assesses the Landscape character of the site to assess the effects of character at the site, local context and wider contexts. The assessment of character includes consideration of changes arising as a result of loss of landscape components, introduction of new development and associated infrastructure and the loss to aspects such as tranquillity, and any perceptual, social environmental and historical considerations which would affect landscape character. This is the right way to interpret our approach and methodology. What is set out in the SLD report is an incorrect interpretation of our approach, as the LVIA approaches Landscape Fabric and Landscape Character as two different aspects. Therefore, it is quite possible to have relatively low adverse effects, or even beneficial effects on the landscape fabric of the site as little fabric is lost or there are substantial gains and conversely Significant Adverse effects on landscape character associated with the introduction of large scale solar infrastructure.

1.1.30 A detailed LVIA methodology that conforms to the landscape Institutes Guidelines for Landscape and Visual Impact Assessment (GLVIA3) is included within **ES Volume 3, Appendix 8-1: Landscape and Visual Impact Assessment Methodology [REP1A-006]**, which has been progressed and agreed with the Local Planning Authorities.

1.1.31 The LVIA recognises the statutory importance of the Cotswold National Landscape (CNL) and its juxtaposition with the Scheme. A standalone Assessment on the Cotswold National Landscape (CNL) and its Special Qualities has been undertaken in **ES Volume 2, Appendix 8-6 [APP-197].**

1.1.32 This Appendix includes assessment of the impacts of the proposal upon landscape character and visual amenity, drawing on the findings of the LVIA and also assesses the effects of the proposals on the special qualities of the Cotswolds National Landscape. This Appendix also considers the enhancement measures incorporated into the scheme, to further the purposes of the Cotswolds National Landscape.

1.1.33 The Scheme was refined through an iterative design process, to avoid and reduce effects on the CNL and its setting. Panels along the edge of the CNL have been avoided from the Order Limits in fields C2, C3 and C4 where significant visual effects on receptors within the CNL were identified. Panels were also avoided within fields C1, C6, C8, the western section of C9 and the majority of C10, with this land now proposed for ecological mitigation to protect the setting of the CNL. In addition, panels within fields A11 and A12 have been avoided and the land repurposed for ecological mitigation to protect the setting

of the CNL towards Sherston. All land parcels adjacent to the CNL are proposed to deliver habitat enhancement, as shown in the Work Plans [APP 007], informed by the CNL Management Plan and the Cotswolds National Landscape Strategy and Guidelines, to further the purposes of the designation. The Applicant considers the proposals to be in line with Core Policy CP42 (i).

1.1.34 A technical Note on Construction Traffic within the CNL has been submitted by the Applicant at Deadline 1. The Technical Note was prepared in response to ongoing engagement with the Cotswold National Landscape Board and provides clarity regarding the justification for selecting the proposed construction routes through the CNL to access Lime Down A, B and C, as well as access locations 101 to 108 serving the Cable Route Corridor. Additionally, a **Technical Note on Tranquillity [PDA-010]** has been submitted by the Applicant. This Technical Note provides a summary of where tranquillity is considered within the landscape and visual, cultural heritage, transport and access, noise and vibration, and socio-economics, tourism and recreation chapters and appendices of the Environmental Statement (ES) for the Scheme.

1.1.35 The Applicant has undertaken an extensive and genuine consultation process with both the CNL Board and Officers from WC throughout the pre-application and Examination process to inform an iterative and landscape led approach to design resulting in a landscape scheme that is substantive and responds to Nature Recovery Strategies and guidelines within published Landscape Character documents. The Scheme has been iteratively refined in response to consultation feedback, including the removal of panels from sensitive parcels, additional viewpoint testing, expanded visualisations (Viewpoint locations and Photomontages have been agreed through consultation with WC and the CNL) and the refinement of mitigation proposals.