



Lime Down

Solar Park

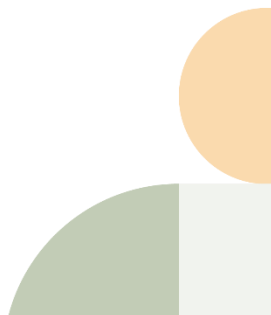
Applicant's Response to Stop Lime Down's Deadline 5 Submission Appendix A: Landscape

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1.1 Introduction

- 1.1.1 Appendix A Landscape Responses to Deadline 4 Documents and EXQ2 submitted by Stop Lime Down (SLD) has been prepared to address:
- Comments on any submissions received at Deadline 4
 - Comments on the ExA's second written questions ("ExQ2")
- 1.1.2 This Note addresses Appendix A Landscape Responses to Deadline 4 Documents and Examiners Second Written Questions and is set out within two sections: A and B.
- 1.1.3 Section A of Appendix A sets out SLD's comments on landscape-related matters on information submitted by the Applicant at Deadline 4, including responses to Deadline 3 submissions, ISH2 submissions / responses, and information requested by the ExA. Section B sets out SLD's comments on ExQ2, where relevant to landscape matters.
- 1.1.4 This document responds to each section in turn.

1.2 Section A - Comments on Applicant's Deadline 4 submissions

Applicant D4 New Documents

Sequential Visual Effects on the Wiltshire Cycleway [REP4-078]

- 1.2.1 The Applicant maintains that they have undertaken a reasonable worst case assessment, and that the position expressed by Ms Tinkler does not represent a reasonable position. The Applicant does not accept that it is reasonable to assume that all existing off site vegetation would be lost over the lifetime of the development. This is especially relevant considering the dispersed nature of the Sites and the strong framework of existing vegetation that exists between them which as an example includes extensive blocks of woodland, many of which is designated as being Ancient Woodland and is protected. Its retention is therefore considerably more likely than its removal. As such, it is not considered that suggesting removal of such large scale landscape features would constitute a 'reasonable' worse case.
- 1.2.2 The establishment and longevity of proposed on site vegetation as well as existing vegetation would be protected under the detailed Landscape and Ecological Management Plan which is secured by Requirement 12 of the **Draft DCO [REP6-005]** and prepared substantially in accordance with the **Outline Landscape and Ecological Management Plan [REP6-037]**.

- 1.2.3 The Applicant notes Ms Tinkler's comments recognising that whilst there may be differences in professional opinion on the application of the methodology and nuance of findings, both the Applicant and Ms Tinkler agree that there would be significant adverse effects to users of Honey Lane (TR202) at construction and Year 1, and whilst remaining adverse, at Year 15 and Decommissioning effects would reduce to not significant.
- 1.2.4 Despite these differences in professional opinion, the Applicant maintains that the LVIA **[REP3-025]**, 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 the views and visibility.
- 1.2.5 It should be noted that GLVIA3 is not a prescriptive methodology for undertaking Landscape and Visual Impact Assessment (LVIA) but rather provides a framework of principles and good practice within which professional judgement is applied.
- 1.2.6 The Landscape Institute's Technical Guidance Note LITGN-2024-01 Published August 2024, Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) sets out that the purpose of LVIA is to communicate the landscape professional's judgement about changes to landscape and views, and that achieving that outcome is more fundamental to good LVIA than the detailed mechanics of a particular methodology. It also expressly says on Page 1 that "variation and debate are to be expected rather than discouraged." And that whilst "GLVIA3 provides a structured process for assessing effects on landscape and visual resources. The responsibility of the assessor is to tailor it to the place and project under consideration, supported by an explanation of the rationale behind the approach taken."

Applicant's Response to Other Parties' Responses to ExQ1 [REP4-081]

LV1.2, LV1.4, LV1.5

- 1.2.7 The LVIA **[REP3-025]** 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.
- 1.2.8 The Landscape Fabric of the Site is considered as a landscape receptor which is assessed separately to impacts on Landscape Character and identified Landscape Character Areas. It is important to note, that the

findings of the effects on Landscape Fabric do not influence the assessment of Landscape Character.

- 1.2.9 The definition of Landscape Fabric is included on Page 48 of the Glossary of the agreed LVIA Methodology and at paragraph 8.7.16 of the LVIA **[REP3-025]** as:
- 1.2.10 "Landscape fabric is the individual tangible elements or features such as landform, woodland, hedges, tree cover, vegetation that make up a landscape or site. These can usually be described and quantified."
- 1.2.11 These are the natural elements within the Site, for example the lengths of hedgerow or areas of woodland and grassland within each individual site - essentially the 'green' elements.
- 1.2.12 The assessment of Landscape Character includes consideration of changes arising as a result of loss (or addition) of landscape components including changes to land management, 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.
- 1.2.13 The methodology used in the LVIA has been developed in response to the increasing number of large-scale solar farms where there is potential for large scale landscape change.
- 1.2.14 By treating Landscape Fabric as a separate Landscape Receptor, the approach allows the physical landscape benefits of the Scheme (such as new hedgerows, woodland and meadows) at the Site level to be quantified without influencing the separate assessment on Landscape Character. Keeping this assessment independent of the assessment of Landscape Character avoids for any 'double counting'.
- 1.2.15 It is noted, that within the Overarching National Policy Statement for Energy (NPS) EN-1 recognises at para 5.10.5 that: "Virtually all nationally significant energy infrastructure projects will have adverse effects on the landscape, but there may also be beneficial landscape character impacts arising from mitigation".
- 1.2.16 Large Scale Solar developments are unusual in that due to the 'overlaid' nature of the development, the scheme can be delivered with minimal vegetative losses, and substantial vegetative gains. Conversely, if a scheme were to result in the opposite conclusions, e.g., substantial vegetative losses of a similar scale to those gains provided by a large scale solar scheme, it would only be appropriate that this was recognised within the LVIA.
- 1.2.17 The LVIA takes account of this through the assessment on Landscape Fabric.

- 1.2.18 The physical change in land use as a result of the development to the fabric of the landscape is from arable farmland to grassland (albeit below solar infrastructure). A solar scheme is essentially 'overlaid' across a landscape and is considered reversible (the infrastructure would be required to be removed at the end of the lifetime of the consent): 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 introduction of ground mounted solar infrastructure does not change the physical fabric of the land within the Site to the same extent as a say a quarry scheme or a residential development for example.
- 1.2.19 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 through new planting and conversely Significant Adverse effects on landscape character associated with the introduction of large scale solar infrastructure.
- 1.2.20 With regard to the Scheme, it is the substantial gains, compared to the negligible losses that are considered to result in the Beneficial Effects to Landscape fabric.
- 1.2.21 The assessment of Landscape Character includes consideration of changes arising as a result of loss (or addition) of landscape components including changes to land management, 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. The Landscape Character change associated with the addition of the array and associated infrastructure, including the changes to land management is considered within the assessment of effects on Landscape Character.

LV1.6

- 1.2.22 The Applicant directs SLD to the **Statement of Common Ground with Wiltshire Council [REP-6-045]** where it is agreed that 'The LVIA methodology follows standard best practice (GLVIA 3)', and that GLVIA3 does not suggest that an LVIA should consider individual Landscape Character Areas (LCAs) or Landscape Character Types (LCTs) as individual Landscape Receptors, rather that LCAs / LCTs are used to identify the Baseline.
- 1.2.23 As set out above Page 1 of LITGN-2024-01 sets out that "variation and debate are to be expected rather than discouraged." And that whilst "GLVIA3 provides a structured process for assessing effects on landscape and visual resources. The responsibility of the assessor is to tailor it to the

place and project under consideration, supported by an explanation of the rationale behind the approach taken."

- 1.2.24 As requested by the ExA, the Applicant has prepared an assessment of landscape Character effects on the local Landscape Character Areas and Types in the **Limestone Lowlands Character Assessment [REP5-103]**. However, the Applicant maintains that the LVIA **[REP3-025]**, has already 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 the views and visibility.

LV1.9

- 1.2.25 The Applicant has identified the setting of the CNL to be defined by the area within which development and land management proposals, by virtue of their nature, size, scale, siting materials or design can be considered to have an impact, positive or negative, on the landscape, scenic beauty and special qualities of the CNL.

LV1.14

- 1.2.26 The Applicant notes Stop Lime Down's ("**SLD**") position on this matter.

LV1.19

- 1.2.27 The Applicant welcomes SLDs confirmation of its position on this matter.

LV1.23

- 1.2.28 The Applicant confirms it has received information on the additional routes requested for assessment by SLD and has accordingly prepared a technical note; **Additional Sequential Visual Assessments [REP6-062]**.

LV1.24

- 1.2.29 The Applicant notes SLDs position on this matter.

Written Summary of Applicant's Oral Submissions and Responses at ISH2 [REP4-085]

- 1.2.30 As set out above in response to **Sequential Visual Effects on the Wiltshire Cycleway [REP4-078]**, the Applicant maintains that they have undertaken a reasonable worst case assessment, and that the position expressed by Ms Tinkler does not represent a reasonable position. The Applicant does not accept that it is reasonable to assume that all existing off site vegetation would be lost over the lifetime of the development.

- 1.2.31 The establishment and longevity of proposed on site vegetation as well as existing vegetation would be protected under the detailed Landscape and Ecology Management Plan which is secured by Requirement 12 of the **Draft DCO [REP6-005]** and prepared substantially in accordance with the **Outline Landscape and Ecological Management Plan [REP6-037]**.
- 1.2.32 ZTV mapping is the desk study component of the visibility analysis. ZTV identifies land that, theoretically, is visually connected with the proposal, however in reality this often produces an overestimation of potential visibility of a Scheme, as in actuality there are often many layers of vegetation or other features across the landscape that are not captured by the ZTV modelling that could affect visibility. The ZTVs provide a starting point in the assessment process and therefore provide a 'worst case' illustration of theoretical visibility. ZTVs are a tool to inform site appraisal and are not a substitute for on site assessment and therefore good practice is that the extent of potential visibility of a Scheme is then refined by site survey.
- 1.2.33 The Applicant confirms that extensive site work has been undertaken at varying points across the year to allow appraisal of the site, the receiving and wider landscape to account for seasonal variation, which has included accompanied site visits with representatives of both the CNLB and WC. This has been supported with viewpoint photography and photomontage, including those additional viewpoints requested by the CNLB and WC.
- 1.2.34 The Applicant maintains that through the avoidance measures embedded into the Scheme Design as part of the Mitigation Hierarchy as set out in Section 8.9 of the LVIA **[REP3-025]** and the standalone assessment on the CNL in **ES Volume 3 Appendix 8-6 Assessment of Effects on the Cotswolds National Landscape and its Special Qualities [REP5-069]**, which includes the avoidance of panels within Fields A1, A11, A12, B12, C1, C6, C8, C9 and C10 that the landscape and visual effects of the Scheme on the CNL and its Special Qualities have been mitigated through the landscape led, iterative design process and have been informed by the Cotswold Nature Recovery Plan in conjunction with liaison with the project Ecologist and consultation with officers at the CNL and WC.
- 1.2.35 The Applicant has provided an assessment of effects on the individual Landscape Character Types in the **Limestone Lowlands Character Assessment [REP5-103]**, which concluded that Negligible Adverse effects were recorded during construction and Year 1 for LCA 7 - Sherston Dip Slope and LCA 6 - Upper Avon Valley, both within the Cotswold National Landscape reducing to No effect at Year 15 and Decommissioning and that this is due to the avoidance measures embedded within the Scheme to protect the CNL. The Assessment concluded that there would be Moderate/ Minor Adverse effects within the

local level Host Hullavington Rolling Lowland Landscape Character Area and corresponding Host Landscape Type-the Lowland Limestone (Forest Marble) Farmland Landscape Character Type.

Applicant D4 updated documents

[REP4-016] LEMP Maps Figure 3-4-5.1 to 3-4-5.2: Landscape and Ecology Mitigation Plan (4 of 4)

1.2.36 The Applicant notes SLDs position on this matter.

[REP4-044] Design Principles and Parameters (Rev 4) (Tracked)

1.2.37 The Applicant notes SLDs position on this matter.

[REP4-062] SoCG with Wiltshire Council (Rev 2) (Tracked)

Ref 3.4.4 ZTVs

1.2.38 The Applicant confirms that SLDs understanding on this matter is correct.

Ref 3.4.5 Landscape ZoI

1.2.39 The Applicant is continuing to discuss this matter with Wiltshire Council. However, the Applicant directs SLD to their findings within; **Limestone Lowlands Character Assessment [REP5-103]**; **Technical Note on Cumulative Sequential Visual Effects [REP1-123]**; and **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]**.

Ref 3.4.6 Assessment Methodology, Ref 3.4.7 Application of Assessment Methodology, Ref 3.4.8 Embedded Design Mitigation

1.2.40 Despite differences in professional opinion between the Applicant, WC and SLD, the Applicant maintains that the LVIA **[REP3-025]**, 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 the views and visibility.

1.2.41 It should be noted that GLVIA3 is not a prescriptive methodology for undertaking Landscape and Visual Impact Assessment (LVIA) but rather provides a framework of principles and good practice within which professional judgement is applied.

- 1.2.42 The Landscape Institute's Technical Guidance Note LITGN-2024-01 Published August 2024, Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third edition (GLVIA3) sets out that the purpose of LVIA is to communicate the landscape professional's judgement about changes to landscape and views, and that achieving that outcome is more fundamental to good LVIA than the detailed mechanics of a particular methodology. It also expressly says that "variation and debate are to be expected rather than discouraged." And that whilst "GLVIA3 provides a structured process for assessing effects on landscape and visual resources. The responsibility of the assessor is to tailor it to the place and project under consideration, supported by an explanation of the rationale behind the approach taken."

Ref 3.4.22 Protected / valued landscape status

- 1.2.43 The Applicant respectfully disagrees with SLD on this matter and would like to clarify that what SLD refer to here as 'Areas' (Sites A - E) have not been assessed or 'treated in this way' with the same level of landscape value. In accordance with the Landscape Institute Technical Guidance Note 02/21 (TGN 02/21), Assessing landscape value outside national designations', the Applicant has undertaken an assessment of the landscape value of the 5 different Lime Down Sites, and has identified Sites A, B and C as being of High Value. The Applicant has identified that the value of the landscape decreases from east to west with Sites D and E being identified as Medium Value.
- 1.2.44 The Applicant understands from SLDs comments that Ms Tinklers position to be that where land is identified as being within the setting of a National Landscape it should be considered to be high value. The Applicant does not agree with this position as landscape value is derived from many varying factors, and whilst being within the setting of a National Landscape may be an indicator to its value, must not be the only consideration. Conversely, where land is outside of the setting of a national landscape, it should not be considered to not being of high value. The intention of TGN 02/21 has been written for precisely this purpose, to provide information and guidance to landscape professionals (and others) who need to make judgments about the value of a landscape outside of National Landscape designations.

[REP4-064] SoCG with Natural England (Rev 3) (Tracked)

Ref 3.2.2 Methodology

- 1.2.45 Please see Applicant's response to this matter above.

Ref 3.2.4 Assessment Results - Cotswold National Landscape

- 1.2.46 Please see the Applicant's response to **Written Summary of Applicant's Oral Submissions and Responses at ISH2 [REP4-085]** above on this matter.

Ref 3.2.7 Cumulative Effects

- 1.2.47 The Applicant disagrees with SLD on this matter and directs to its findings contained within the: LVIA [REP3-025]; **Limestone Lowlands Character Assessment [REP5-103]**; **Technical Note on Cumulative Sequential Visual Effects [REP1-123]**; and **Technical Note on Intra Project Cumulative Visual Effects [REP1-122]**, which do not identify any adverse significant effects associated with the Scheme and any of the Cumulative Development Sites.

1.3 Section B Comments on Examiners Second Written Questions

Landscape and Visual (LV) - Cotswolds National Landscape

LV2.1 re Time Limited Enhancements, to the Applicant, Wiltshire Council, Natural England, CNLB

- 1.3.1 At decommissioning other than the buried cabling, all infrastructure would be removed with agricultural fields returned to landowner control. The reinforced landscape however would be retained as there is an expectation that at Year 60 that there would be an equivalent of current countryside policies in place to ensure the protection of hedgerows, woodland, trees etc.
- 1.3.2 As set out within the **Outline Landscape and Ecological Management Plan [REP6-037]**, management of those areas within the Scheme proposed for wildflower would be designed to reduce fertility. A period of establishment is allowed for with these areas, and the time to target condition for these areas within the BNG Metric is between 5 to 10 years. With appropriate seed mix selection and habitat management implemented, wildflower meadows have been created on many solar farms including on former arable sites, as demonstrated within the latest Solar Habitat report which includes a case study demonstrating this particular matter: <https://solarenergyuk.org/resource/solar-habitat-2026/>
- 1.3.3 The Applicant's position is that for the extent of the development, the enhancement measures would seek to further the purposes of the CNL. The measures identified by the Cotswold National Landscape Board (CNLB) as 'furthering the purposes' and as set out in the ExA's question

are dependent upon the continuation of the development. The Applicant cannot control what is done with these elements on decommissioning of the Scheme and return of the land to the original landowner. It would be open to the landowner to retain them.

- 1.3.4 The Applicant notes and welcomes agreement from SLD that a time-limited enhancement can be relied upon to seek to further the purpose of conserving and enhancing the natural beauty of the CNL under section 85 of the CRow Act. This position aligns with that of the Cotswold National Landscape Board. The Applicant notes that there is no specific requirement within the wording of the CRow Act or supporting DEFRA guidance for enhancements to be permanent, and that the Applicant has received confirmation from the CNLB in their document submitted into Examination **'Comments on any other submissions received at deadline 2' [REP3-154]** acknowledge that the Applicant has sought to further the purposes of the CNL:
- 1.3.5 "...the Applicant has sought to further its natural beauty through the proposed enhancement measures located in the setting of the CNL, including some of those outlined at Table 19 of ES Appendix 8-6 such as 60 hectares of wildflower meadow and 63 hectares of set aside for ground nesting birds. These would comprise enhancements to the CNL's setting above and beyond the current baseline condition on land which is visually connected to, and has a complementary landscape character to, the adjacent CNL."
- 1.3.6 With regard to the removal of enhancement measures at decommissioning, the Applicant's position is that rather than the removal of the enhancements being harmful to the setting of the CNL, the removal of the enhancements would constitute a return to the current baseline position. The Applicant welcomes agreement from SLD on this matter.