

Technical Memorandum 8 (AAH TM08)

Lincolnshire County Council, Meridian Solar: Deadline 1 document review

Introduction

AAH Consultants, on behalf of Lincolnshire County Council (LCC) have reviewed the Deadline 1 document responses. These include:

- Comments on Relevant Representations Report
- Local Impact reports (LIR) from local authorities
- Initial Statements of Common Ground (SoCG) – South Holland DC, Lincolnshire County Council
- Outline Landscape and Ecology Management Plan (Rev 1)
- Outline Construction Environmental Management Plan (Rev 1)

The Meridian Solar Farm (Reference: EN010169) Application documents that have been accessed and reviewed are available on the Planning Inspectorate Website at:

<https://national-infrastructure-consenting.planninginspectorate.gov.uk/projects/EN010169/documents>

AAH comments on the Deadline 1 documents are as follows:

Comments on Relevant Representations Report -REP1-074

South Holland District Council – comments related to Landscape and Visual issues are located between pages 17 – 39 (SHDC 012-037) and include the headings Landscape and Visual Matters, Landscape Character, Mitigation, Visual Effects, Grid Connection Route and overhead line infrastructure, Residential Visual Amenity, Cumulative Effects, Future Baseline, Seasonal Photography and visualisations, and Conclusions.

Regarding Landscape and Visual Matters and Landscape Character, the Applicant ‘maintains its view that while significant adverse landscape and visual effects will attribute some negative weight in the planning balance, the substantial benefits and urgent need for the Scheme outweigh these adverse effects’. This statement by the Applicant seems to imply that Landscape and Visual issues will not be a determining factor in this application and is therefore of lesser importance. The Applicant has a duty of care to ensure that adverse effects on the landscape and visual setting are minimised, and this statement seems to imply a weak commitment to achieving this.

Regarding mitigation, the Applicant ‘recognises that these effects cannot be fully mitigated’ and that ‘the extent and form of planting has been developed to provide targeted screening and landscape integration whilst avoiding extensive new vegetation patterns that would themselves adversely affect the characteristic openness of the Fenland landscape’. AAH agree a targeted approach is required but believe more could be done to enhance existing vegetation. For example, the complete omission of the Grid connection corridor from landscape mitigation is an oversight and wasted opportunity for enhancement.

Regarding visual effects, the Applicant dismisses concerns over VP3 and VP14 as ‘not representative of other PROW located with the study area’ or ‘located at a gap of existing roadside shrubs’ that will be closed by proposed mitigation planting. The Applicant does not agree that the scheme would be ‘dominant and extensive’ from several public and residential receptor locations. AAH agree that VP3 is different from other PROW as it is elevated and runs along a raised embankment (Barrier Bank / Wash Bank) adjacent to the River Welland. However, these man-made features are characteristic of this locality, and the PROW is well used as it is located between the settlements of Cowbit and Crowland. Changes to the landscape adjacent to this route will have an adverse impact on the amenity of those receptors on this route.

Regarding the Grid connection route, ‘all landscape and visual effects reported with respect to the Grid connection Route infrastructure are moderate adverse’. The Applicant has understood that only effects that ‘exceed moderate adverse’ (in EN-5) are considered significant and undergrounding is not required and this approach is consistent with national policy (p30 - RR). It is not clear why the Applicant has applied a higher threshold for significance in this instance when their own LVIA methodology (p21 – Meridian LVIA) shows clearly that moderate effects can be assessed as ‘significant’.

Regarding RVAA, the Applicant states that significant effects in an LVIA will not potentially lead to reaching the RVAA threshold. An RVAA is only required when it meets the TGN 2-19 criteria of ‘blocking only available views from a property or overwhelming views in all directions or unpleasantly encroaching or being inescapably dominant from the property’. This is inaccurate. P5 of TGN-05 states that ‘for properties in (relatively) close proximity to a development proposal, and which experiences a high magnitude of visual change, a RVAA may be appropriate, and may be required by the determining / competent authority’. Looking at P12 of TGN-5, the descriptions quoted by the Applicant, ‘overwhelming views’ etc. are given as examples of language that can be used – but they are not the determining factors - as presented.

Regarding cumulative effects, the Applicant states ‘it is the nature of large-scale infrastructure projects that adverse effects cannot always be avoided or fully mitigated. The status of the scheme as CNP (Critical National Priority) infrastructure means that residual impacts, including landscape and visual, should not outweigh the urgent need for the scheme in the planning balance.’

Regarding the future baseline, the Applicant considers that ‘the relevant developments were fully considered in the ES and that it provides an appropriate assessment of both the anticipated future baseline and the cumulative effects of the Scheme’.

Regarding Seasonal photography, additional winter views have been provided by the Applicant within the Additional Winter Photography Technical Note (Ref 8.8).

In conclusion the Applicant maintains ‘the significant adverse landscape and visual effects reported will attribute some negative weight in the planning balance, but the substantial benefits and urgent need for the scheme outweigh these adverse impacts.’

Summary: the Applicant acknowledges many of the general points raised in the RR by South Holland District Council but commits to no further changes or updates to their design approach or report work. The only additional information provided are the winter views in the Additional Winter Photography Technical Note (Ref 8.8). The Applicant is inaccurate regarding the potential need for RVAA and the LA has the right to request one if they deem it necessary. The significant impact of the Grid Connection infrastructure on the landscape and visual setting seems to have been

understated and it is concerning that no landscape mitigation is proposed for this route apparently under the pretext of protecting Fenland character.

Lincolnshire County Council – comments related to Landscape and Visual issues are located between pages 124 – 136 (LCC 065-083) and include the headings Landscape Effects, Visual Effects, Mitigation and Enhancement Measures, Residential Visual Amenity Assessment (RVAA), Decommissioning, Cumulative Effects, Outline LEMP and Conclusion.

Regarding Landscape Effects, the Applicant considers that these effects ‘have been appropriately assessed’ and ‘should be considered within the wider context of the benefits of the scheme as set out with the assessment of planning balanced described within Section 6 of the Planning Statement (APP-260).’

Regarding Visual Effects, Mitigation, Enhancement measures, Decommissioning, and Cumulative effects the Applicant has ‘no further comments to make’.

Regarding the RVAA, the Applicant uses the same argument given to SHDC that significant visual effects identified in the LVIA do not automatically justify an RVAA. The Applicant’s decision not to provide an RVAA was a ‘reasoned professional judgement’ based on guidance, the design evolution of the scheme and on the LVIA. Regarding ‘design evolution’ the strategy of providing offsets is cited as being sufficient to avoid ‘overbearing and intrusive design’ impacting on residential receptors. In view of the Applicant’s response to SHDC on RVAA (above), AAH would question whether this was the right decision. We would argue that many residential properties are in ‘close proximity’ to the proposed development (even with setbacks) and that the impact on private views should be assessed using the RVAA process.

Regarding the Outline LEMP, the Applicant describes in detail their proposed maintenance regime asserting that it is ‘proportionate and robust’ and ‘will fulfil its intended function by Year 15 and over the lifetime of the project’. The request for a 15-year establishment period is rejected.

In Conclusion, the Applicant reiterates that there is no landscape design for the Grid Connection route for the reasons explained in ES Chapter 12: Landscape and Visual (APP-063) i.e. mitigation planting will not reduce the significance of the proposed infrastructure and would be out of keeping with the open landscape in this location.

Summary: the Applicant commits to no further changes or updates to their design approach or report work in response to the general points raised in the RR by LCC. ‘No further comment’ and ‘LCC has accurately summarised Applicant assessment’ are the standard responses to most of the issues raised.

Issues raised by public - In addition, p651- 657 covers comments raised by the public on issues related to Landscape and Visual Issues. These issues include concerns with pylons destroying countryside views, concerns with overhead line visual impact and request for undergrounding instead, concerns with solar panels destroying countryside views, concerns with the scheme destroying countryside views and landscape character, concerns with industrialisation of the rural landscape and cumulative impact alongside other major energy schemes, concerns about habitat management, and finally, concern that the Grimsby to Walpole is not considered in the cumulative assessment.

Regarding pylons and over headlines, the Applicant states that their assessment did not find any 'major adverse effects on residential amenity during any phase of the development' and that they are not undergrounded because the proposals do not pass through designated land and all landscape and visual effects are assessed as 'moderate adverse'.

Regarding visual effects of Solar panels, The Applicant recognises that 'significant visual effects would remain at Y15, following establishment of mitigation planting, from locations where there are direct views into the Site'. However, the Applicant highlights they propose to do 'advance planting' in some locations and have applied 'good design' covering the 'layout, height and orientation of the PV panels' to minimise visual intrusion while maintaining technical viability.

Regarding destroying countryside views, The Applicant relies on the landscape design in the OLEMP which includes 'screening with bands of native scattered trees and shrubs throughout the Solar Development Area.'

Regarding cumulative effects, the Applicant's response on p655 is incomplete (paragraph ending in a comma).

Habitat Management Areas are outside the scope of Landscape and Visual, and this concern should be reviewed by the project Ecologist.

Regarding Grimsby to Walpole not being considered, the Applicant points out that this project is considered within ES Chapter 12: Landscape and Visual.

Summary: the Applicant commits to no further changes or updates to their design approach or report work in response to the general points raised by the public and refers them to ES Chapter 12 and other completed assessment work. There is an error on p655 where the applicant's response is not complete.

Comments on Local Impact Reports – REP1-106

Comments related to Landscape and Visual issues are located on p30-34. Included in the LIR is a summary of relevant National and Local planning policy, that the Applicant should comply with, and a comprehensive summary of the AAH review of the Meridian Solar proposal under the headings: Methodology and assessment, Landscape baseline and assessment, Visual assessment, Design and mitigation, Cumulative assessment, Figures and supporting information. This summary is concluded with a recap of the key points and concerns, which include:

- Concern that there shouldn't be a minimal approach to mitigation in all cases as there is some established vegetation in some locations. VP3 and Whaplode Drove are identified as being suitable for more planting.
- Concern that the importance of PROW on South Holland Main drain has been overlooked, with no setbacks, and long-distance routes like the McMillian Way are not keyed in Figure 12-3.
- Concern that the impact of the solar arrays on landscape character has generally been understated with loss of 'agricultural land use' and 'openness' not considered with sufficient emphasis.

- Concern that the visual assessment seems to be understating the impact of the substations with more explanation on their visual impact required.

At this stage (DL1), the Applicant has yet to respond to these issues. AAH have identified specific locations and local issues in the hope the Applicant can use these comments to modify and strengthen their design proposals and assessment reporting. However, the Applicant's responses to the RR seem to dismiss Landscape and Visual concerns as unlikely to be important in the context of the 'planning balance' and the Critical National Policy (CNP) status of the project which is concerning. The Applicant has made no commitment to update or modify their LVIA or design mitigation in response to the RR feedback. It is hoped feedback in the LIR will be taken more seriously.

Comments on Statements of Common Ground – REP1 -081 & 082

South Holland District Council - Landscape and Visual issues are covered from p24 with most issues 'Under Discussion' and only the need for an RVAA described as 'Not agreed'. The topics listed as 'Under Discussion' include Future baseline, Visualisations – cumulative project models, Impacts on landscape, Visual Effects, Grid connection route and OHL infrastructure, Cumulative effects, Mitigation, Advanced Planting and Overhead Line Solution.

Lincolnshire County Council - Landscape and Visual issues are covered from p42 with two issues 'Agreed' including LVIA Methodology and LVIA Assessment. All other issues are 'Under Discussion' including RVAA (the need for), Outline LEMP and Landscape Masterplan.

Outline Landscape and Ecology Management Plan (Rev 1) – REP1-071

Reviewed – no further comment at this stage

Outline Construction Environmental Management Plan (Rev 1) – REP1 -061

Reviewed – no further comment at this stage

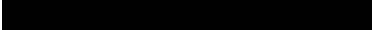
In conclusion, AAH believe the following Landscape and Visual matters remain at DL1 and should be carried through into SOCG discussions and the Examination.

- Concern about under the reporting of the significance of the impact of OHL/Pylons, Solar arrays and substations.
- The need for RVAA. AAH believe that RVAA should be requested.
- Extent of landscape mitigation. AAH believe that more justification is required to omit the Grid Connection Corridor from the landscape mitigation process.
- The need for more targeted landscape mitigation adjacent to, and to link, existing landscape features
- PROW – some of these routes will be adversely affected (see VP3 and VP14). The Applicant is asked to review their approach to mitigation on these sensitive routes to minimise impacts on them.

- The need to ensure their offset criteria apply to all PROW routes including South Holland Main Drain.
- All recommendations in the LIR (including those highlighted above) should be properly reviewed and considered by the Applicant with clarifications given if no action is taken.


AAH Landscape

05th October 2026


www.aahconsultants.co.uk