# Green Hill Solar Development

Application by Green Hill Solar Farm Ltd. for an Order granting Development Consent for a proposed solar development on land between Northampton and Wellingborough

PINS Ref: EN010170

# Summary

of

## Landscape and Related Matters Statement

for

## Deadline 1 Written Representations

November 2025

by

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for

Stop Green Hill Solar

# Summary


S1 I am a Chartered Landscape Architect instructed by a group of residents called Stop Green Hill Solar to advise on landscape and visual matters relating to the Application, and act for the group during the Examination.

S2 I specialise in landscape, environmental and colour assessment and planning in the UK and abroad, and have done so for over 40 years. Since 2021 I have been involved with numerous renewable energy and electricity generation / transmission / storage proposals (wind / solar / pylons / BESS), some of which are Nationally Significant Infrastructure Projects, working with local planning authorities, parish councils, and community groups at all stages of the planning / Development Consent Order process. I am therefore very familiar with the issues associated with the proposed Scheme.

S3 I reviewed the Application documents and other material, and carried out an in-depth desktop assessment of landscape, visual and associated effects. I then visited the sites and surrounding areas to undertake on-the-ground survey and assessment, analysed the findings, drew conclusions, and compared them to the Applicant's.

S4 I was also greatly assisted by local residents who are very familiar with these landscapes, and have incorporated the material which has been or will be submitted during the Examination into my studies. Some of the material provides important details and illustrations of the sites' contextual landscapes, and the features, resources and qualities which are most highly-valued.

S5 The full account of my assessment and review, and analysis of the findings, is set out in my report and the associated appendices.

S6 A summary of the findings, and my conclusions, are set out below.

S.7 The LVIA predicts that during construction and the first 15 years of operation, the proposed development would give rise to **significant adverse effects on landscape character and visual amenity**.

S.8 I **agree** with this conclusion, although my assessment found that levels of adverse landscape and visual effects would be **higher** than assumed in the LVIA.

S.9 However, I do **not** agree with the LVIA's conclusion that after 15 years of operation, apart from at three viewpoints, not only would adverse effects on character and views no longer be 'significant', but also, effects on character would be **significant beneficial**.

S.10 My review and assessment concluded that a) after 15 years of operation, effects on many landscape and visual receptors would **remain** significant adverse, and b) there would be **no landscape (nor visual) benefits**.

S.11 The reasons for the differences in judgements are partly due to different interpretations / applications of the published guidance, mainly GLVIA3. In my opinion, there are certain errors in the Applicant's LVIA's method and process, and flawed assumptions have been made.

S.12 For example in some cases, landscape and visual receptor sensitivity levels were underestimated, partly due to lack of granular baseline survey and analysis.

S.13 In particular, many of the notable localised variations in character which occur across the study area were not identified, and thus were not factored into judgements about landscape / visual value and susceptibility.

S.14 Such variations occur due to the distribution of the numerous highly-valued natural and cultural / heritage assets which are present throughout the study area. Whilst some were noted in the LVIA, their contributions to landscape and visual value were not properly considered. The assets display different characteristics and have varying degrees of influence and association, resulting

in each village and its contextual landscape having its own local distinctiveness and sense of place, often with subtle but important variations in levels of value, for reasons which, at first glance, may not be obvious.

S.15 Visual receptor sensitivity levels were underestimated mainly because the LVIA's criteria for visual susceptibility were incorrect.

S.16 Also, and very importantly, the LVIA did not consider the landscape as a **resource,** especially the complex natural, cultural, social and visual functions and services which the sites and their contextual landscapes perform / provide. Most if not all of the resources / functions / services contribute to landscape and visual value in some way.

S.17 This is a **major omission** (and a departure from the guidance), as many of the existing functions / services in the local and wider area are critical to both environmental and human health, including making important contributions to all aspects of 'landscape'. All could be adversely affected by the proposed development.

S.18 For example, the landscapes make highly important contributions to the settings of numerous significant heritage assets, and the assets contribute to the high levels of landscape and visual value. This was not considered in the LVIA, and of course affects judgements about overall effects.

S.19 The landscapes support a wide variety of wildlife habitats, many of which are designated. The section of the River Nene which bisects the Scheme is of international and national importance, being an SPA, Ramsar site, and SSSI. The LVIA did not consider the implications of changes to these habitats, which could result in adverse effects on character and views.

S.20 The landscapes are also a highly-valued recreational resource: in particular, the LVIA did not consider the adverse effects on the social / recreational amenity of people using the network of lightly-trafficked rural lanes and PRoWs enjoyed by residents and visitors alike – several popular long-distance trails run through the study area and through the sites, and many people visit the small, historic villages interspersed along the way. Walkers, cyclists, and equestrians are well-catered for.

S.21 In addition, the LVIA did not identify nor factor in the cause and nature of many of the impacts and effects arising from the Scheme which could adversely affect landscape and views, for example glint and glare (note that there are significant problems with the Applicant's GGA method).

S.22 Furthermore, the LVIA did not differentiate between direct and indirect landscape effects.

S.23 The LVIA predicts that by Year 15, the proposed screen planting would have established and matured. As a result, it concludes that levels of **all** adverse landscape effects, and the vast majority of adverse visual effects, would reduce to the point where they would no longer be 'significant', remaining at the same levels for the duration of the operation.

S.24 I do **not** agree with this conclusion, for reasons which include the following:

a) The LVIA places a great deal of reliance on both existing and proposed vegetation to screen views and thus reduce high levels of landscape and visual effects.

b) However, not all adverse effects on landscape character can be mitigated by screening (ie experiential effects, eg on tranquillity).

c) Also, not all of the identified views could or would be screened by the proposed planting (for example, at elevated locations, and along the PRoWs which cross some of the sites).

d) It is possible that by Year 15, the proposed hedge planting could have established successfully, although that cannot be guaranteed. However, even with the inclusion of (locally-uncharacteristic) fast-growing species, the new woodland planting is highly unlikely to have become an effective screen by then. In other similar cases, decision-makers have

concluded that the proposed planting would not become effective until at least Year 25 of operation (assuming successful establishment and good after-care).

e) Where visual screening would **not** be achieved as assumed, magnitudes of effect at Year 15 would be **higher** than predicted, resulting in **underestimations** of levels of overall adverse landscape and visual effects.

f) It **cannot** be assumed that views would remain screened for another 45 years, whether by proposed or existing vegetation. The Applicant may have control over the former, but none over the latter, which consists of planting which could be reduced / removed / lost at any point in time. Note that whilst ash trees are very common in the study area, and currently help screen views of the proposed development sites, there is now widespread ash dieback. Also, many hedges which the LVIA assumes would screen views for the duration of the operation (60+ years) contain / comprise elm, but Dutch elm disease is rife. The worst-case vegetation-free scenario should be adopted from the outset, and the Scheme sited and designed accordingly.

g) Note that the LVIA does **not** report the worst-case visual scenario of effects at winter Year 15, it reports effects in the summer of that year when trees would be in full leaf.

h) The LVIA states that to achieve effective screening, hedges within the Applicant's control would have to be grown up to and managed at c. 4.5m tall. However, in parts of the study area, tall hedges are uncharacteristic, so in themselves, **the proposed mitigation measures would give rise to adverse landscape effects**.

i) Also, **the proposed screen planting would give rise to adverse visual effects**. In many cases, the proposed 4.5m tall hedges would screen views across characteristically open landscapes. Where the views are across the developed sites, the LVIA assumes this would reduce levels of adverse visual effects, whereas the result is the total loss of view regardless of whether the view includes the sites or not, and thus a significant adverse visual effect.

S.25 The LVIA concludes that from Year 15 onwards, the scheme would deliver **significant landscape character benefits**, due to the proposed screen planting.

S.26 Notwithstanding the LVIA's questionable assumption that the proposed planting would a) establish successfully, and b) remain in place for the rest of the Scheme's life, the main reason why this judgement is flawed is because in LVIA, measures which are proposed to mitigate landscape and / or visual effects, such as screening vegetation, **cannot** be double-counted as landscape / visual enhancements (GLVIA3 para. 3.39).

S.27 At best, the effect would be Neutral, but at worst it would be **significant adverse**, due to the planting being uncharacteristic and / or resulting in the total loss of a view.

S.28 However, in my opinion, the most serious flaw in the LVIA's assessment of effects, which is a complete departure from GLVIA3, is that the significant landscape benefits which the LVIA has **erroneously** identified **only** relate to what it calls the sites' 'landscape **fabric**' – a term which is not used in GLVIA3 but which the LVIA defines as landscape elements, such as hedges and trees. As the LVIA **does not consider effects on the overall character of the sites**, it cannot draw conclusions about whether effects on overall character would be beneficial or adverse.

S.29 GLVIA3 clearly explains that LVIAs should firstly establish the site's overall character, derived from a combination of factors of which landscape elements are just a part. Then, it should consider effects on the elements, and go on to assess effects on the overall character which has been identified. The LVIA has **omitted** this second critical step.

S.30 Furthermore, the assessment must differentiate between **direct** and **indirect** effects on landscape character.

S.31 **Direct** effects on character mainly occur on-site. Direct adverse effects arise from physical impacts which normally cannot be mitigated (for example, the change from greenfield to brownfield land). Therefore, in this case, **direct effects on the overall landscape character of all the sites would be significant adverse**.

S.32 Evidently, the level of the direct adverse effect would be very high due to the **intense and extensive industrialisation of these very rural landscapes**, which display visible and buried time-depth, with numerous significant historic landscape features; contain and support many designated and highly sensitive wildlife habitats; possess a wide range of positive aesthetic and perceptual qualities, including tranquillity and remoteness; act as a highly-valued resource for residents and visitors (and hence contribute to health, wellbeing and quality of life, **and** the local rural economy); and perform / provide many other complex natural, cultural, social and visual functions and services.

S.33 Also note that there would be significant adverse effects on soils and water quality, again, with adverse implications for character and visual amenity. Both would be adversely affected by pollutants, and soils would suffer what could potentially be irreversible damage. The presence of BESS adjacent to the River Nene's highly sensitive aquatic and riparian habitats is a **major concern** given the catastrophic environmental effects likely to occur during a thermal runaway event, although evidently, elsewhere, soils and watercourses / water bodies would be adversely affected.

S.34 In addition, here, a very large proportion of the land within the Order Limits is **BMV land**, and the rest is highly productive.

S.35 Furthermore, it is highly unlikely that the land could or would be restored to its current condition and use, as the Applicant proposes (the LVIA states that '*agricultural fields would be returned to agriculture with **all** structural landscape mitigation retained*'). The soils' ALC grades would almost certainly be far lower than they are now.

S.36 Note that the proposed DNO substation complex, high-security fencing, gated access and cables would remain post-decommissioning.

S.37 Construction, interim, and decommissioning works can and do result in long-term / permanent adverse effects on soils (and adverse effects on water quality / drainage – the two are closely interrelated).

S.38 The Applicant has not considered how the proposed wildflower meadow / pasture would be successfully established on the sites, given that they require low-fertility soils and the receiving soils are highly fertile.

S.39 The Applicant appears to assume that 'resting' arable soils for long periods is beneficial for soil health and quality: this is true from an ecological perspective, but not from an agricultural one, where the intention is to revert to highly-productive arable use, as is the case here. The reality is that after just a few years of 'resting', soil fertility declines significantly, and after long periods, is extremely difficult to restore.

S.40 The Applicant also claims that continued agricultural use could continue by grazing sheep within the solar array areas; however, in reality, grazing sheep within solar arrays areas is neither feasible, practical nor viable, and is even unwise.

S.41 The above landscape related matters (ie effects on soils and water quality, BESS risks, loss of BMV land, restoration, sheep-grazing etc) are explained in more detail in the appendices to this report.

S.42 **Indirect** effects on character usually occur off-site, and indirect adverse effects can sometimes be mitigated. Importantly, levels of indirect effects on character tend to reduce gradually with distance, with the highest levels occurring closest to the site. The LVIA's judgements do not recognise this, predicting that levels of effects on the overall character of the landscapes lying

between the sites and up to 1km from their boundaries would be exactly the same, which of course, they would not (this is mainly due to the LVIA having categorised **all** the landscapes within 5km of the sites' boundaries as having the same levels of value and susceptibility to change, despite the notable localised variations).

S.43 **Indirect effects on the overall character of the landscapes closest to the sites would be significant adverse for the duration of the operation**.

S.44 Note that the **residential amenity** of a large number of people would be adversely affected.

S.45 Evidently, combined, the significant adverse landscape and visual effects that would occur / be experienced within each of the proposed sites' zone of interinfluence and / or intervisibility would **significantly adversely affect an extremely large area, and large numbers of people**.

S.46 The proposed development would heavily industrialise a swathe of good quality, rural, open countryside **c. 23km long and up to c. 7km wide**, and the industrialising influence would extend for many kilometres beyond the Order Limits.

S.47 Solar development homogenises and sterilises rural agricultural landscapes, resulting in the loss of natural seasonal changes and rhythms which are an integral part of how these landscapes have been experienced for hundreds of years. They are **not** homogenous, they display considerable **diversity and complexity**.

S.48 During ISH1, the Applicant's landscape expert explained that a landscape-led approach had been adopted throughout the early stages of the Scheme to ensure that adverse impacts, and effects on landscape and views in particular, were minimised. However, in my opinion it is unlikely that apart from the identification of features such as nationally-designated areas / sites / features, effects on landscape character and visual amenity featured in the site selection process at all.

S.49 The reason for the 'scattering / dispersal' of the sites across such a vast area appears not to be a conscious design intention, but the result of the most important criteria for site selection being i) a suitable point of connection to the Grid, and ii) large landholdings held by willing landowners. This does **not** constitute a landscape-led approach (nor, for that matter, a minimisation of BMV land-take approach) to site selection.

S.50 Another important, related point to bear in mind is that due to northern latitude and associated climate / variable weather, in the UK, solar is **extremely inefficient** – current estimates are just over 10%, so **disproportionately large amounts of land are required to achieve a profitable output**.

S.51 The question is, could the Scheme be constructed on a smaller area of land whilst still producing the same output, which could potentially reduce levels of landscape, visual and other harm? I note that the ExA has also queried the Applicant's overplanting ratio in ExQ1 Q5.0.1.

S.52 In summary, in my opinion, the levels of the majority of the significant adverse landscape and visual effects arising from the proposed development would be higher than the LVIA predicts, and the majority of the effects would remain **significant adverse from start to finish**.