



11/12/2025

For the attention of: Nicola Thompson

**Green Hill Solar Farm Development Consent Order  
LIR Landscape and Visual Matters: Comments on Applicant Response  
Document Reference: EX2/GH8.1.14**

**NNC 8.24–8.25 – Assessment of Landscape Sensitivity**

The Council acknowledges the Applicant's explanation of how sensitivity has been derived. The Applicant has provided a structured assessment that considers both value and susceptibility, and the Council agrees that this aligns with recognised methodology. In general terms, the Council also agrees with the sensitivity ratings applied across much of the study area.

Notwithstanding this broad agreement, the Council maintains that certain sites exhibit characteristics that justify a higher degree of susceptibility than reflected in the ES. In particular, Site F displays more noticeable topographic variation than other parts of the scheme, creating a landscape that is more open to perceptual changes and appreciation of the countryside. Even where direct visibility is intermittent or filtered, the underlying landform means that solar development would sit within a more visually sensitive setting compared with flatter or more enclosed sites.

However, it is important to emphasise that this represents a matter of professional judgement on a limited number of sites. The Council agrees that the sensitivity assessment is otherwise predominantly sound and consistent, with differences confined to specific locations where local character and landform introduce differing susceptibility and in turn, sensitivity.

**NNC 8.34–8.35 – Residual Visual Effects and Viewpoint Clarification**

The Council appreciates the Applicant's confirmation of baseline information and accepts that an error was made in the LIR regarding VP31 and agrees with the justification set out in Applicants Response (Document Reference: EX2/GH8.1.14) for VP16 and VP32.

In respect of Easton Lane, the Council has carefully considered the Applicant's position but maintains that the level of visual change remains understated in some cases. From Easton Lane (TR080), where rising landform, open skylines and a sense of rural remoteness contribute to a more sensitive visual experience than reflected in the ES. While the Council recognises the Applicant's position, the magnitude of change in our judgement, is slightly greater than reported.

**NNC 8.36 – Landscape Fabric**

The Applicant is correct that new hedgerow, woodland and riparian planting would enhance certain physical elements of the landscape, and the Council wishes to emphasise that it is not opposed to these proposals. Strengthened field boundaries, riparian buffers and new habitat areas are recognised as positive contributions to the ecological and structural qualities of the setting.

The LVIA Methodology (GH6.3.8.1\_ES Appendix 8.1) defines landscape fabric as the tangible elements or features that make up the landscape, including landform, woodland, hedges, tree cover and vegetation. GLVIA3 paragraph 7.25 further explains that landscape effects arise from changes to individual elements or features of the landscape and from the introduction of new elements or

features. This is an important clarification because it confirms that all newly introduced features influence landscape fabric. In this case, the new hedgerows, woodland and habitats would contribute positively, while the solar arrays, fencing, access tracks, substations and associated infrastructure also constitute new elements that materially change the landscape fabric.

Although the additional planting would enhance certain components of the fabric, the Council's concern relates to the replacement of agricultural land use with utility-scale energy infrastructure. Land use is itself a tangible and central component of landscape fabric, contributing significantly to both the appearance and the functional character of the countryside. The introduction of extensive energy infrastructure represents a substantial and enduring alteration that cannot be balanced solely by reinforcing vegetative structure. Even in locations such as Site E, where public views are limited, the presence of new industrial elements across large land parcels results in a meaningful transition in landscape fabric and the character associated with it.

When applying the principles set out in GLVIA3 paragraph 7.25, the beneficial effects of the proposed planting must therefore be considered alongside the extensive introduction of engineered and functional elements. At the most generous interpretation, these contrasting influences could result in a neutral overall effect on landscape fabric. However, given the scale and nature of the new infrastructure relative to the planting proposals, the Council considers that the residual effect would remain slightly adverse.

#### NNC 8.38–8.39 – Landscape Character Effects

The Council notes the Applicant's reaffirmation of the ES conclusions and accepts that the term "blanket weighting" may not be the best term to describe the approach taken. However, the Council remains concerned that the concluding judgements for landscape character are essentially the same across all sites and at various scales.

The Council also notes the Applicant's statement that the development can be accommodated without undue adverse effects. This is not consistent with the Applicant's own findings in EN010170-000857-GH6.3.8.3\_A\_ES Appendix 8.3 (Revision A), where the LVIA Assessment Sheets clearly identify significant adverse effects on landscape character within the 1 km Study Area at Construction and at Year 1. The Applicant's assertion of "no undue adverse effects" therefore appears inconsistent with the significance levels reported in the ES.

The Council's position remains that landscape character change is not dependent on visibility. Whether the arrays can be seen from a given viewpoint is not the determinant of landscape character effects. Character change arises from the alteration of land use, the introduction of energy infrastructure and the changes to landscape fabric. These factors are relevant irrespective of visibility.

For these reasons, the Council continues to consider that effects on landscape character within the 1 km study area remain Moderate-Major Adverse at Year 1. The Applicant's response does not provide new evidence that would alter this judgement.

#### NNC 8.43 – Hedgerow Height and Enclosure

The Applicant confirms that changes to hedgerow height have been considered in the LVIA judgements. The Council accepts this but continues to emphasise that hedgerows grown to around 4–4.5 metres introduce a degree of enclosure that is unfamiliar in some of the landscape character areas. Although screening can reduce visual prominence, the resulting sense of a more enclosed, and compartmentalised landscape represents a character effect in its own right. This occurs regardless of whether the solar arrays are visible and therefore must be given weight as part of the overall assessment.

#### NNC 8.45–8.48 – Cumulative Site Effects

The Council has considered the Applicant's comments but remains concerned that the magnitude and duration of operational landscape effects continue to be understated. The Applicant places weight on the following 6 reasons for its judgements:

**1. Dispersed Nature of the Sites**

The Applicant states that dispersal prevents the Scheme from reading as a single cohesive development. The Council agrees this may be true visually, but cumulative landscape character effects are not contingent on visual connection. Across the Sywell Plateau, the sites occupy a substantial proportion of the same landscape character area. Their dispersed arrangement does not reduce influence; it merely extends the footprint of land-use change across a wider geographic area. The cumulative character influence therefore persists regardless of whether the sites are perceived together.

**2. Scheme Being 'Overlaid' and Reversible**

Although described as an "overlay," the Scheme replaces agricultural land use with energy infrastructure for 60 years. Land use is a tangible component of landscape fabric and strongly shapes character. Even if removed after decommissioning, for the duration of the Scheme this area will not function, appear or be managed as farmland. Reversibility in the distant future does not diminish the long-term character effects experienced during operation.

**3. Strong Framework of Vegetation**

Vegetation can soften visual effects, but it does not negate landscape character change. Tall, reinforced hedgerows and new woodland blocks may increase enclosure and alter existing rural qualities, and the infrastructure remains present behind them regardless of visibility. The ability to screen elements does not remove the fact that multiple parcels across the same character area shift from agriculture to solar generation, resulting in a sustained change to character.

**4. Benefits of Mitigation Planting at Year 15**

Mitigation planting will help reduce visual effects in the long term, but it does not reverse the underlying alteration in land use or the functional identity of the landscape. The Applicant acknowledges adverse character effects at Year 1, and these effects continue for several decades beyond that point. Screening improves appearance, but the character shift persists for as long as the infrastructure remains.

**5. Biodiversity Net Gain (BNG)**

BNG provides ecological benefits but does not mitigate landscape character change arising from large-scale energy infrastructure. Ecological enhancement and landscape character are related but separate planning considerations. Biodiversity improvements do not diminish the scale of land-use change or the perceptual shift from open agricultural countryside to a managed energy landscape.

**6. Legacy Landscape**

The concept of a legacy landscape may provide long-term ecological or structural benefits, but these would only be realised following decommissioning. For the entirety of the operational period, the character of the affected areas remains defined by energy infrastructure rather than farmland. A 60-year lifespan delays any legacy value and prolongs the period during which adverse landscape character effects are present.

For these reasons, the Council maintains that the operational effects on landscape character, particularly when considered cumulatively across sites, would be slightly more adverse than the Applicant has judged. This is a matter of degree rather than a fundamental difference, especially as the Applicant already identifies adverse landscape character effects within the 1 km, 2km and 5km study areas. The Council's view is that, given the extent of land-use change and the distribution of sites across areas, the cumulative influence on landscape character would be slightly greater than reported. Mitigation will help reduce impacts by Year 15; however, the underlying change in land use and the associated character effects continue for the duration of the Scheme and remain adverse.

**Comments on 60-year operations period.**

From a landscape perspective, the Council considers that a 40-year operational period would be materially preferable to the proposed 60-year duration. The Applicant acknowledges within the ES that significant adverse effects on landscape character will occur at Construction and persist at Year 1, and that these effects will only begin to moderate as mitigation establishes by approximately Year 15. The Applicant has also confirmed that adverse effects remain at Year 15, even if reduced in magnitude compared with the early operational phase.

On that basis, extending the scheme to 60 years prolongs the period during which the landscape is subject to adverse character effects. Under a 40-year scenario, such effects would remain present for approximately 25 years beyond Year 15. Under a 60-year scenario, the same adverse effects would persist for around 45 years beyond Year 15. The difference is therefore not marginal: the more extended duration would maintain a materially altered character for almost twice as long during the period after mitigation has matured. The length of time for which the countryside carries an energy-infrastructure character, rather than an agricultural or open rural one, is therefore significantly greater under a 60-year lifespan.

In addition, the Applicant places considerable emphasis on the concept of a “legacy landscape”, suggesting that the scheme will leave the landscape in an improved condition after decommissioning. If this legacy is to be realised, then an earlier end to the operational phase provides a clear benefit. A 40-year period would allow restoration, re-establishment of agricultural land use where appropriate, and the assimilation of any retained ecological or structural planting into a future landscape context at an earlier point. This would bring forward the timetable within which the stated benefits of long-term habitat creation, enhanced structure and improved landscape resilience can be experienced without the continued presence of energy infrastructure.

A 40-year period would also align more closely with common assumptions in past solar schemes, where a 30–40 year operational lifespan has been regarded as the standard temporary period for large solar developments. It would therefore better reflect established expectations for the reversibility of such infrastructure and support clearer planning certainty regarding when the underlying land use might return to a more traditional rural character.

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#### **Place Services provide landscape advice on behalf of North Northamptonshire Council**

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.