

EN010170 Green Hill Solar

# SGHS Landscape Note for Deadline 6, 24<sup>th</sup> March 2026

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This note deals with landscape and visual matters. It was prepared by Carly Tinkler CMLI on behalf of Stop Green Hill Solar (SGHS), for submission at Deadline 6. It combines SGHS's ISH5 oral submission on landscape and glint and glare, and the group's response to ExQ 3.7.1.

The first part of the note (*Landscape and Visual Effects (Part 1)*), and the last (*Glint and Glare*), were read out at ISH5, for Agenda Item 3.2 The middle section (*Landscape and Visual Effects (Part 2)*) is included as it summarises the main reasons why the matters outlined are not agreed.

## Landscape and Visual Effects (Part 1)

This note summarises my **current** position, which is slightly different from my position as set out in my **Deadline 5** response. It also responds to **ExQ 3.7.1**.

At **Deadline 5**, SGHS submitted comments [**REP5-121**] on the Applicant's **Deadline 4** submission *Applicant Responses to Stop Green Hill Solar* [**REP4-021**]. The note explained my position on landscape and visual effects, and set out residual matters agreed and not agreed. At that point, the matters remained as per my WR landscape report and appendices (**REP1-195** and **REP1-193** respectively), and summarised in later responses.

For reasons explained in my report and elsewhere, in summary, my position on the following matters at **Deadline 6** is unchanged:-

1. I **agree** that for many receptors, **visual effects** would remain significant adverse for the duration of the operation. However, in my opinion, in several cases, **levels of effects would be higher than assumed** in the Applicant's LVIA.
2. I also **agree** that between Years 1 and 15, **indirect effects on the character of the landscapes within 1km of the site's boundaries** would be **significant adverse**. However, in my opinion, **levels of effects on the landscapes closest to the sites would be higher than assumed**.
3. I **do not agree** that at Year 15 and beyond, the **indirect adverse effects on the character of the landscapes within 1km of the sites' boundaries, and closest to the sites**, would reduce to the point where they no longer breach the significance threshold, remaining **significant adverse until the end of the project**.
4. I do **not agree** that at Year 15 and beyond, there would be **significant beneficial effects on the sites' landscape 'fabric'** (or 'elements'), and I do **not agree** that when the project was decommissioned, there would be 'long-term legacy landscape benefits'.

Another matter which remained unresolved at **Deadline 5** was that the Applicant's LVIA **did not assess direct effects on the overall character of the sites**, only on the sites' landscape 'fabric'. 'Fabric' is one of many aspects of overall landscape character, which include a variety of key characteristics, qualities, and natural, cultural, aesthetic and perceptual factors.

My own assessment concluded that **direct effects on the overall character of the sites would be significant adverse for the duration of the operation, and could not be mitigated**.

However, the Applicant's **Deadline 5** submission now confirms that **there would indeed be direct significant adverse effects on the character of the sites for the duration of the operation.**

The comment is in **REP5-088 Applicant's Comments on Further Commentary to ExA Second Written Questions**, on page 14 of the PDF, at item **2.2 Stop Green Hill Solar**, Ref: **SGHS-09**, Question **ExQ 2.13.2 Mitigation planting.**

It states, '*The LVIA... acknowledges that there would be **an immediate change to the character of the Sites themselves... and that this would result in Significant Adverse Effects***', and '*It is fully acknowledged that **the character of the Site itself... would be Significantly Adversely affected***'.

I **agree** with this conclusion, but it was **not made clear in the LVIA** (see Part 2 below).

During **ISH5**, the Applicant's landscape expert said he agreed with the above.

There are other aspects of the Applicant's LVIA with which I still do not agree, but those of most relevance are as set out above.

The following section was not read aloud at ISH5 but is included for ease of reference as it is a summary of the main reasons why the above matters are not agreed, in response to ExQ 3.7.1.

## Landscape and Visual Effects (Part 2)

At Deadline 5, my position remained as set out in my landscape report [**REP1-195**], and the appendices to my report [**REP1-193**], and summarised variously in **REP1-195** (landscape report summary); **REP3-101** (SGHS's Deadline 3 Summary of Oral Submissions to ISH-2); **REP4-044** (SGHS's Deadline 4 submission); and **REP5-121** (SGHS's responses to the Applicant's Deadline 4 submission).

In a nutshell, I **agreed, and still agree**, that **for many receptors, visual effects would remain significant adverse for the duration of the operation**, and that in some cases, mitigation is not possible. However, in my opinion, in many cases, **levels of effects would be higher than assumed** because the LVIA does not factor in a) the high levels of adverse effects resulting from the total loss of a good view; b) the proposed screening measures being uncharacteristic; and c) it being highly unlikely that existing (and proposed) vegetation would continue to screen views for the duration of the operation.

I **also agreed, and still agree**, that between Years 1 and 15, the **indirect effects on the character of the landscapes within 1km of the site's boundaries** would be **significant adverse**. However, in my opinion, **levels of effects would be higher than assumed and would fall not below the significance threshold**, partly because the LVIA underestimates levels of landscape receptor sensitivity.

I **do not agree** that at Year 15 and beyond, the **indirect adverse effects on the character of the landscapes within the Local Study Area** would reduce to the point where they no longer breach the significance threshold, mainly because the LVIA does not factor in a) non-visual effects on character, and b) the adverse effects arising from the proposed screen planting that would result in loss of characteristic openness.

I do **not agree** that by Year 15 and beyond, there would be a **significant beneficial effect on the sites' landscape 'fabric'** – which in LVIA is most commonly called 'landscape elements', ie trees, hedges, roads and so on. That is because the LVIA erroneously assumes that proposed landscape / visual mitigation measures such as planting hedges and trees to screen views can be double counted as landscape / visual enhancements. In fact, at best, the effect would be Neutral, at worst significant adverse, the latter due to a) the planting being uncharacteristic (tall hedges), and b) the loss of characteristic openness.

For the same reasons, I do **not agree** that when the project was decommissioned, there would be 'long-term legacy landscape benefits.

This section explains in more detail the issue of the Applicant's LVIA not having assessed direct effects on the overall character of the sites, only on the sites' landscape 'fabric', and the recent change (at Deadline 5) in the Applicant's position outlined above.

Firstly, in the Applicant's LVIA [APP-045], paragraph 8.9.26 states that '*The character of the Sites themselves and their immediate surroundings would be adversely affected*', but does not state the level of effect, nor whether the level would be significant.

See [APP-081] Appendix 8.3: LVIA Assessment Sheets, page 611 of the PDF which is Table *Green Hill: Assessment of Cumulative Site Effects*. The list on this page is 1) landscape 'fabric', 2) local study area, 3) wider study area, and 4) outer study area. The **landscape character of the sites themselves is not mentioned**.

Note that regarding 2) local study area, LVIA para. 8.4.20 is clear that the '*Local 1km Study Area... is the 1km area extending as a radius **from the outer boundary of the Sites***', ie it does **not** include the sites.

Turn to [APP-081] Appendix 8.3: LVIA Assessment Sheets, page 629 of the PDF, where the heading is *Individual Site Assessments*. The next page is *Landscape Fabric*. The following pages deal with effects on the sites' landscape fabric, but **not** their overall character. Note that 'fabric' – aka elements – is only **one aspect of character**.

Now go to PDF p. 668, and the heading *Landscape Character - The 1km Study Area (The Local Study Area) (Individual Sites)*. Note the heading includes 'individual sites', but this section only describes the character of the sites, and reports effects on the landscapes within *the 1km area extending as a radius from the outer boundary of the Sites*, not effects on the overall character of the sites themselves.

**Either** the levels of effects which are reported are **direct adverse effects on the character of the sites**, or, they are **indirect effects on the character of the landscapes within 1km of the sites**. They **cannot apply to both**.

In fact, in the assessment sheets, the LVIA does acknowledge **significant** indirect adverse effects on landscapes within 1km of the sites between Year 1 and Year 15. Evidently, levels of **direct effects on the character of the sites would be even higher** and could not be mitigated.

As mentioned previously, there are other aspects of the Applicant's LVIA's method and interpretation of the guidance with which I still do not agree, or do not understand. For example, why all the landscapes within the 5km study area are categorised as being of Medium sensitivity when there are obvious **notable localised variations**. This has implications for judgements about levels of effects

The fact that there is agreement between the Applicant's and Councils' landscape experts about the LVIA method and approach (as emphasised by the Applicant in responses) does not alter my position on those matters. Also, the Councils are still expressing concerns about certain aspects of the LVIA (for example cumulative effects; mitigation effects; visual effects; and not factoring in local landscape designations and omitting the localised variations). Indeed, regardless of the reasons why, the Councils appear to **agree** that levels of adverse landscape and visual effects have been underestimated.

Should the Examining Inspectors consider it necessary, the Landscape Institute could be asked to clarify technical points of disagreement relating to LVIA / GLVIA3: they cannot comment on project-specific matters, but the inquiry can be 'anonymised'.

## Glint and Glare

My position on this matter is set out in SGHS's Deadline 4 submission [REP4-044], SGHS Comments on [REP3-074] Applicant's Responses to ExQ2, at **Q2.13.10 Effect on local roads** (for WNC)

*In paragraph 4.167 - 4.169 of the LIR, reference is made to local roads having been omitted from the glint and glare assessments. The applicant has submitted a further Glint and Glare Technical Note [REP2-054],*

*does this document address these omissions or do you consider further local roads should be included in the assessments?*

This question is directed to WNC, but SGHS would like to draw the Examining Inspectors' attention to **REP3-101** (SGHS's *Summary of Oral Submissions to ISH-2*), paras. 54 – 66, which summarise the reasons (as explained in REP1-193 *Appendices to SGHS's Landscape and Related Matters Statement*, Appendix CT-I *Glint and Glare*) why the Applicant's recent assessment of glint and glare effects on local roads has concluded that receptors would only experience Low levels of effects, and why generally, in SGHS's opinion, the Applicant's Glint and Glare Assessment (GGA) [**APP-052**] is flawed.

Regarding local roads specifically, the first paragraph of REP2-054 Section 2.1 *Road Infrastructure – Local Roads* states that '*Based on industry guidance, technical modelling is not recommended for local roads, where traffic densities are likely to be relatively low*'.

Firstly, the 'industry guidance' is precisely that – there is no independent GGA guidance.

Secondly, the qualifying note to the above sentence in terms of traffic densities being relatively low (which is also a criterion for assessing effects on the safety PRow users, as opposed to amenity which is not assessed) is that 'therefore, a glint / glare event would not result in large numbers of casualties / fatalities, unlike an air, rail, or major road accident'.

In SGHS's opinion, even one casualty / fatality should be of great concern, especially if the risks were identified but not mitigated.

I understand that an opposition group has appointed an expert to review the informal guidance which the Applicant's glint and glare consultants have relied on, this person having produced much of the data used by the firm which produced the guidance. If this becomes available before the close of this Examination, it could be made available.

During ISH5, the Applicant's glint and glare expert did not have any comments on the above.