On behalf of the Hatton Action Group (THAG)

Appeal by Hatton Solar Farm Limited under Section 78 of the Town and Country Planning Act, 1990 in relation to

Land adjacent to Sotby Wood, Sturton Road, Hatton

Appeal Ref: APP/D2510/W/25/3363157

LPA Ref: s/079/0178/22

Proof of Evidence on Landscape and Visual Matters

by Peter Radmall, MA, B.Phil, CMLI

August 2025

Contents

Executive Summary

My name is Peter Radmall. I am an independent landscape and environmental planning consultant, and am representing the Hatton Action Group (THAG). THAG are acting as a Rule 6 Party to represent the local communities and Parish Councils opposing the proposed Hatton Solar Farm.

This Proof of Evidence provides a critique of the Appellant's Landscape and Visual Impact Assessment (LVIA) prepared by James Blake Associates (JBA), December 2021, as a basis for providing my own assessment. In doing so, I have reviewed the LVIA methodology, conclusions and supporting visual material, focusing on areas of agreement/disagreement, and any omissions. The latter have included a series of supplementary viewpoints not covered by the Appellant's evidence.

The site lies within East Lindsey Landscape Character Area (LCA) E1: Wragby to Horsington Vale Woodland and Farmland, near the boundary with LCA G3: Hainton to Toynton All Saints Wold Farmland. This boundary lies within a transitional zone between the Central Lincolnshire Vale and the Lincolnshire Wolds, which creates a diverse agricultural landscape with interspersed woodland, shallow valleys, open skylines and historical farmsteads, notably Grade II listed Corner Farm.

Local amenity is enhanced by a combination of openness, uninterrupted views, tranquillity, and the absence of intrusive features, except for a gas compressor station that is located 1km to the west of the site and is of modest scale.

On the basis of the Landscape Institute's Technical Guidance Note 02/21, I have assessed the site and its setting, and find it to have 'Medium to High' landscape value, with high scores for landscape condition, recreational amenity and function. Its recreational value is enhanced by a network of public rights of way (PRoWs), permissive paths, bridleways and green lanes.

While not nationally designated, the site lies within c3km of the Lincolnshire Wolds National Landscape (formerly AONB) and very close to a locally designated Area

of Great Landscape Value (AGLV). These designations reinforce its sensitivity and underline its role as part of a locally valued landscape under NPPF 187(a).

The Appellant's LVIA has been based on 24 representative viewpoints, which I broadly accept to be relevant. However, I have identified further sensitive viewpoints relating to residential properties and PRoWs locations that I consider should have been included in the LVIA. Key visual receptors will include residents, walkers, horse-riders and drivers, most of whom are of high sensitivity and whose visual amenity depends on the availability of open, rural views.

As part of my review, I have used the services of Mike Spence (MSenvision) to carry out a technical critique of the visual material supporting the LVIA. He has identified a number of concerns, including

- The absence of visualisations, photomontages or wireframes to illustrate the impacts.
- Photography that is not wholly compliant with Landscape Institute guidance (TGN 06/19).
- A Zone of Theoretical Visibility (ZTV) that omits explicit reference to 3m-high panels.
- The absence of verifiable evidence supporting the mitigation assumed to be achieved by planting.

The solar farm would cover most of the site with 3m-high panels, arranged in rows within existing field boundaries, and enclosed by security fencing, CCTV and new hedgerows. A substation with a 15m mast would add to its sources of visual intrusion.

The scheme would permanently remove arable cultivation from the areas occupied by the solar farm, thereby eroding openness, interrupting views and introducing uncharacteristic energy infrastructure into an overwhelmingly agricultural landscape. The mitigation planting proposed by the Appellant, whilst potentially providing some limited benefit in terms of biodiversity, would actually serve to further reduce openness and obstruct key views over time.

When assessing the landscape effects, I demonstrate how the Appellants LVIA underestimates:

- The sensitivity of receptors, particularly arable land-use within LCA E1.
- The importance of perceptual attributes such as openness, wildness and tranquillity.
- The magnitude of the Year 1 (Y1) and Year 15 (Y15) effects.

My evidence concludes that the sensitivity of the site is Medium–High (not Medium) and that the Y1 effects on its character would be Major (not Moderate). I also conclude that the effects on LCA E1 and LCA G3 are rated higher than in the LVIA. The proposed mitigation planting of hedgerows of 3-4m in height would not substantially reduce these effects, and in some cases would worsen the harmful loss of openness.

In relation to visual effects on the 24 LVIA viewpoints:

- At Y1, I agree with the predicted effects on 15 of the viewpoints, but disagree with 9 – mostly due to the LVIA's underestimation of impacts, often by an order of magnitude.
- By Y15, I agree with the predicted effects on 6 viewpoints, and have highlighted how the LVIA overstates the degree of mitigation achieved for the remainder.

I have also identified several additional viewpoints that would experience potentially significant effects, effectively doubling the LVIA's tally of significant residual effects. These supplementary views highlight impacts from:

- Properties within/near the AGLV.
- Well-used PRoWs, permissive paths and bridleways.
- Residential properties immediately to the north of the site.

During the course my fieldwork, it became clear that views to and from Corner Farm – an historic listed building and recognisable landmark within the landscape - are particularly sensitive.

At Y1, I predict significant adverse effects for 8 of the supplementary viewpoints, of which all but one would remain significant at Y15. These include locations where the development would dominate close-range views and interrupt valued visual connections between communities.

My evidence concludes that:

- The site forms part of a locally-valued agricultural landscape, the setting of which includes the Lincolnshire Wolds and AGLV.
- The LVIA fails to address key receptors, omits critical viewpoints and lacks the visual evidence necessary to verify its findings.
- The development would cause material harm to landscape character, openness and visual amenity, particularly for the high-sensitivity receptors within its setting.
- Mitigation planting would not remove physical or spatial harm and would in places exacerbate the loss of openness.
- In view of the likely permanence of a consented change-of-use (despite the nominal 40-year consent), the landscape harm should be regarded as long-term.

In light of this, if landscape and visual impacts were the only planning consideration at this appeal, I would contend that the level of harm demonstrated would justify its dismissal.

1. Introduction

Witness Background

1.1 My name is Peter Radmall. I am an independent landscape and environmental planning consultant, trading as Peter Radmall Associates. I am instructed to prepare this proof of evidence [CD8.19] on behalf of the Hatton Action Group (THAG), who are acting as a Rule 6 (R6) Party in the forthcoming public inquiry. I have an MA, Geography from the University of Oxford (1976) and a B.Phil. in Landscape Design from the University of Newcastle-upon-Tyne (1978).

1.2 I have c45years post-qualification experience, mainly in a consulting capacity in landscape/environmental planning/EIA, with some teaching (University of Sydney, 1986-88). I have been a sole practictioner since 1995, involved in major EIAs (e.g. HS2), LVIAs and planning appeals (e.g. West Cumbria coal mine).

1.3 My consulting work has included renewable energy projects such as wind turbines and solar farms, including the Cutler's Green Solar Farm in Essex and the Fern Brook Solar Farm in Dorset. I have worked previously in Lincolnshire, including gas/ethanol facilities on Humberside and minerals.

1.4 I have been assisted in preparing this evidence by Mike Spence of MSenvision, who has reviewed the visual material supporting the LVIA. His background and details are provided in **Appendix A**.

Scope of my Evidence

1.5 This evidence addresses the landscape/visual impact of the proposed Hatton Solar Farm (Appeal Ref: APP/D2510/W/25/3363157), based on a critique of the relevant Planning Submission documents. My starting-point has been the Landscape and Visual Impact Assessment (LVIA) prepared by James Blake Associates (JBA), December 2021 [CD 2.13].

1.6 I have carried out my own fieldwork (in July 2025) within the site and surrounding area, guided by the viewpoints (VPs) identified in the LVIA. The LVIA has provided the framework for my own assessment, within which I have commented on whether I agree with its methodology and conclusions.

1.7 As referred to above, this work has included a technical review by MSenvision of the visual material - Zone of Theoretical Visibility (ZTV) and photography – supporting the LVIA, which is attached as **Appendix A**.

1.8 I have taken the decision not to produce my own standalone LVIA, primarily because this would involve substantial duplication of the appellant's material. I have instead reviewed the LVIA and highlighted points of deficiency or dispute, including where I agree/disagree with aspects of its analysis, methodology and conclusions.

1.9 This has included the identification of supplementary views that I consider to have been omitted from the LVIA, together with a number of concerns about the assumptions on which the JBA assessment is based.

1.10 I shall be making reference in this POE to the following documents:

- National Planning Policy Framework (NPPF, December 2024 [CD7.5];
- Guidelines for Landscape and Visual Impact Assessment (GLVIA3), Landscape Institute/IEMA, 3rd edition, 2013 [CD6.12];
- Landscape Institute Technical Guidance Note (TGN) 02/21: Assessing landscape value outside national designations [CD6.7];
- Landscape and Visual Impact Assessment (LVIA), James Blake Associates, December 2021 [CD2.13];
- East Lindsey Local Plan, July 2018 [CD5.7];

- East Lindsey District landscape character assessment (LCA), ECUS Ltd, 2011 [CD6.1-7];

- National character area profiles for NCA 43 and 44, Natural England, online [CD6.8];

- Lincolnshire Wolds AONB Management Plan, 2018-2023 [CD6.9];

- Landscape Institute Technical Guidance Note (TGN) 06/19: Visual Representation of Development Proposals, September 2019 [CD6.10];

- Proposed Site Layout Plan 02 [CD1.24]; and

- Glint and Glare Assessment/Addendum [CD2.9/2.29].

2. The Site and its Landscape Context

Published Character

2.1 LVIA Figure 6 shows the site as located within National Character Area (NCA) 44: Central Lincolnshire Vale, but close to its boundary with NCA43: Lincolnshire Wolds. In practice, the distinction between the two NCAs in this location comprises a zone of transition, in which there is some intermingling of characteristics, rather than by an abrupt change of character on the ground.

2.2 This transition is more accurately portrayed by the distinction between the district-wide Landscape Character Areas (LCAs, ref East Lindsey LCA, CD6.1-7]. LVIA Figure 6 confirms that the site is located within LCA E1: Wragby to Horsington Vale Woodland and Farmland, but close to its boundary with LCA G3: Hainton to Toynton All Saints Wold Farmland.

Influences on Local Character

2.3 The relationship between the NCA and LCA boundaries shows how they broadly reinforce each other, whilst being reflected differently on the ground in terms of the transition between three key characteristics:

- Topography, whereby the low-lying vale gives way to the elevated wolds;
- Farmland, traditionally mixed, but mostly arable - the prevailing land cover across the wolds and to a degree also within the vale; and
- Woodland, a secondary, but locally prominent land cover within LCA E1 (e.g. Sotby Wood, which adjoins the site to the north-west).

2.4 The relationship between these characteristics can be appreciated as you move around the area, across a sequence of shallow valleys and flat- topped ridges, where open farmland contrasts with woodlands and hedged fields, and wooded with open skylines, including occasional glimpses towards

Lincoln Cathedral (a "key characteristic" of LCA E1, as defined in the East Lindsey LCA [CD6.2].

2.5 This experience suggests that the local landscape is more visually complex than might at first be appreciated – for example, if the site were located more centrally within the NCAs or LCAs. This complexity is underpinned by the continuity provided by a farmed landscape derived in large part from the enclosure pattern and its relationship to surrounding farmsteads (e.g. Grade II listed Corner Farm) and the scattered hamlets of Hatton, Sotby and Great Sturton.

2.6 As a result of the predominance of farmland as a land-cover, the principal perceptual experience of the landscape – both by local residents and by those using public rights-of-way (PRoWs) – is of a varied, but generally high degree of openness. This allows a strong degree of visual access to the landscape, reinforcing local identity and underpinning its amenity value.

2.7 The other principal influence on local character and amenity is the relative absence of intrusive features. These are confined to the Hatton Gas Compressor Station and its associated substation, which are located c1km to the south-west of the appeal site, which the gas pipeline also passes through. Whilst the taller structures associated with this infrastructure are intermittently visible above hedgerow height, they are relatively modest and of insufficient scale to be a determinant of landscape character.

3. Indicators of Landscape Value

Background

3.1 The LVIA derives the sensitivity of landscape receptors from their value and susceptibility, as set out in LVIA Table 2. This is consistent with good practice as per GLVIA3 [CD11.13]. It is notable that the LVIA considers the value of all landscape receptors to be Medium, except for LCA G3 (in which the site is not located), which it considers to be of High value.

3.2 The LVIA does not explicitly consider whether the site may be located within a valued landscape, as per NPPF 187(a). However, as highlighted in their Statement of Case (SoC) [CD8.7] Section 5.2, the R6 Party concerns are based in large part on the perception that the value of the landscape contributes significantly to their amenity as residents and users of local PRoWs.

3.3 I have also become aware of this during the course of my own fieldwork, and have therefore undertaken my own assessment of this value in accordance with the Landscape Institute (LI) guidance – TGN02/21: Assessing landscape value outside national designations [CD6.7].

TGN02/21 Assessment

3.4 Table 1 of TGN02/21 sets out "A range of factors that can be considered when identifying landscape value." These are summarised in **Table 3.1** below.

Table 3.1: Summary of TGN02/21 Landscape Value Factors

Factor	Definition
1. Natural Heritage	Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape
2. Cultural Heritage	Landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape
3. Landscape Condition	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure

4.	Associations	Landscape which is connected with notable people, events and the arts
5.	Distinctiveness	Landscape that has a strong sense of identity
6.	Recreational	Landscape offering recreational opportunities where experience of landscape is important
7.	Perceptual (Scenic)	Landscape that appeals to the senses, primarily the visual sense
8.	Perceptual (Wildness and Tranquillity)	Landscape with a strong perceptual value, notably wildness, tranquillity and/or dark skies
9.	Functional	Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape

3.5 The landscape I have considered for the purposes of this exercise comprises the appeal site and such surrounding land as may be regarded as its setting, (i.e. potentially inter-visible with the site/development, including approaching sections of PRoWs or roads).

3.6 I have scored each of the factors on a low/medium/high scale, with a brief explanation as follows:

1. Natural Heritage: Medium/possibly Medium to High – This is essentially a managed agricultural landscape, but with pockets of enhanced habitat value (e.g. Sotby Meadow, Sotby Wood, established hedgerows, minor watercourses and a pond within the site);

2. Cultural Heritage: Medium to High – A landscape of historic enclosure pattern and remnant estate woodlands, punctuated by historic farmsteads such as Corner Farm. This is located in a locally prominent position, sufficient for it to recur as a landmark in the supplementary views (**Appendix C**). The site/surroundings also form part of the setting of the nearby communities of Hatton, Sotby and Great Sturton;

3. Landscape Condition: High – The landscape has a well-managed appearance, with few/no obvious examples of deterioration;

4. Associations: None/Low – None have been identified;

5. Distinctiveness: Medium – The landscape identifiably forms part of the transitional Lincolnshire landscape of wolds/vale, as highlighted in the descriptive text within the East Lindsey LCA [CD6.1-7];

6. Recreational: High – A landscape with a coherent and well-used network of PRoWs, permissive paths, bridleway, green lanes and roads. These routes include permissive paths within the site itself, public access land within the adjoining Sotby Wood, a public bridleway along the eastern edge of the site, and views from the Lindsey Trail (national trail). It is understood that, in the absence of specific facilities in Hatton, Great Sturton and Sotby, these routes represent the only recreational amenity for local residents.

7. Perceptual (Scenic): Medium to High – A landscape that provides a strong perceptual experience as you pass through/walk within it at different times of the year, reinforcing the visual and social links between the communities of Hatton, Sotby and Sturton;

8. Perceptual (Wildness and Tranquillity): Medium to High – Whilst wildness is reduced by the managed character of the landscape, levels of tranquillity are high;

9. Functional: High – A multi-functional landscape that includes food/timber production, recreational and residential amenity (including equestrian and holiday lets), ecological services and flood mitigation.

3.7 This analysis suggest that the site/surrounding area scores as follows: None/Low = 1 factor, Medium = 1 factor, Medium/Medium-High = 1 factor, Medium/High = 3 factors, and High = 3 factors. I therefore consider the landscape to fall most consistently into the Medium to High category of value.

3.8 Whilst the landscape may not fall within a majority of High value factors, it is clearly of above-average value, which I consider to be sufficient for it to be regarded as a Valued Landscape (VL) at a local level. I would note that the introduction to NPPF187(a) refers to the need for planning decisions to "*…contribute to and enhance the natural and local environment*" [my emphasis]. This natural and local perspective is precisely that in which landscape value should therefore be considered for NPPF purposes.

Designated Landscape

3.9 As shown on LVIA Figure 5: Designations Plan, the appeal site is located c3km from the Lincolnshire Wolds National Landscape (NL, formerly AONB), the closest part of which lies to the north-east, beyond High Street/B1225.

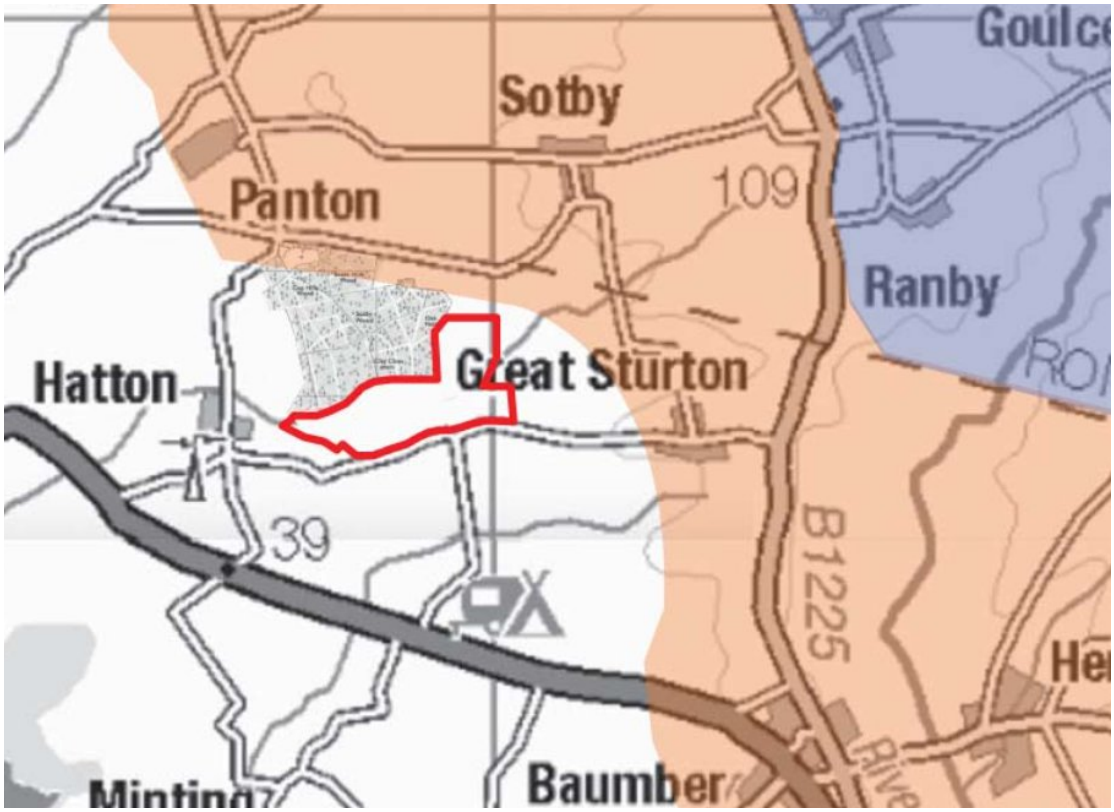
3.10 This part of the NL boundary corresponds to a north/south ridge of locally elevated terrain, beyond which the land descends into the River Bain valley. The "wolds" characteristics extend westwards to some degree beyond this boundary to form the transition between LCAs G1 and E1 (and between NCAs 43/44), as described in Section 2.

3.11 In addition to the (then) AONB, Figure 4 of the East Lindsey LCA shows an adjoining Area of Great Landscape Value (AGLV). An extract from this map is reproduced as **Figure 3.1** below, on which the AONB is shown in mauve and the AGLV in orange, and to which the appeal site has been added.

3.12 Because of the difference in scale between the OS base (to which the red line relates) and the smaller-scale map on which the AGLV is defined, care needs to be used in comparing their respective positions. Whilst the site appears not to fall within the AGLV, the proximity of the latter clearly indicates an increase in landscape value immediately to the north and east of the site, and within the potential visual influence of the development. Even allowing for my cautionary point above, the properties within Sotby that would experience close-range views of the solar farm (Greenacres, Moor Farm etc) are almost certainly located within the AGLV.

3.13 The LVIA makes limited reference to the AGLV, even though the AGLV is explicitly referred to in the LCA description of character area E1 as follows: "*The fabric of this agricultural landscape is based on a patchwork of fields and woodland interwoven with mature hedgerows with hedgerow trees and scattered rural settlements and farmsteads. Parts of the eastern edge of the area are designated as an Area of Great Landscape Value*" [My emphasis, LCA p44 [CD6.2].

Figure 3.1: Relationship to NL and AGLV



3.14 LVIA Figure 9 suggests that the visual influence of the development does not extend as far as the boundary of the NL. Even allowing for the criticisms of the ZTV made in **Section 5**, my own fieldwork indicates that this is likely to be correct.

3.15 The setting of NLs/AONBs is a material consideration in assessing impacts on their character from external developments (ref NPPF189). Such settings are rarely defined on the ground, since they depend on the scale of development and the aspects of setting that are of relevance on a case-by-case basis.

3.16 The presence of the AGLV, however, indicates that the immediate vicinity of the site has previously been found to be of enhanced ("great") landscape value. My understanding is that it continues to be defined as such within the district-wide LCA [CD6.1-7] and East Lindsey Local Plan [CD5.7]. The ZTV shown in LVIA Figure 9 confirms that the development would potentially be visible from locations within this area, which has been confirmed during the course of my fieldwork.

3.17 The "Outstanding Qualities" of the Lincolnshire Wolds AONB are described in the Management Plan [CD6.9]. Para 2.3 of the Management Plan states that "*the high scenic quality of the Wolds depends almost entirely upon the area's use for agriculture*." Whilst the site is not within the AONB, this relationship between land cover, openness and scenic quality extends beyond its boundaries into the fringes of the adjoining vale landscape. It therefore applies equally to the scenic quality of the local area, including the appeal site.

Conclusion re Landscape Value

3.18 My analysis of the site/surrounding area against the TGN02/21 guidance suggests that the local landscape can be considered to be of generally Medium to High value, with the highest values recorded in relation to the landscape's condition, function and recreational amenity. As a result, I consider the area to be worthy of consideration as a locally valued landscape for NPPF purposes.

3.19 This value is reflected generally in the proximity of the National Landscape and the persistence of valued characteristics across the transition from the wolds into the vale. Specifically, it is also reflected in the designation of the fringes of the vale as an AGLV, which includes land immediately to the north and east of the site. This designation is understood to remain a material consideration in the Local Plan.

4. Visual Context

Introduction

4.1 The visual assessment is addressed in LVIA Section 6. Comments on the technical basis for the ZTV and photography are presented in **Appendix A** and are summarised in **Section 5** of this POE.

4.2 The assessment has been based on 24 representative viewpoints, which are shown on LVIA Figure 9. Whilst I am broadly satisfied with the range and number of the LVIA viewpoints, I have during the course of my fieldwork had my attention drawn to several supplementary viewpoints which I consider should also have been addressed – these are set out in **Section 8** and corresponding photos are attached as **Appendix C**.

Receptors

4.3 The LVIA identifies the visual receptors as comprising local residents and users of PRoWs, nearby lanes and the permissive paths within the site. It should be noted that residents, walkers on PRoWs/permissive paths and horse-riders on the bridleway should generally be regarded as receptors of high sensitivity, due to the important contribution that the availability and character of views makes to their amenity.

4.4 It can be assumed that in many cases these receptors are likely to be the same people, including drivers on local roads. I have taken these sensitivities into account when forming my own judgments about the potential impact on the views. It should be noted, however, that the LVIA (despite stating this as an objective in LVIA 1.1.3) has generally ignored residential receptors when assessing their views. This has in part prompted the identification of the supplementary viewpoints in **Appendix C**.

4.5 One of my main criticisms of the LVIA is its absence of visualisations, as a basis for both its conclusions and for the assumptions it has made about the mitigation achieved by the proposed landscaping. As a result, the R6 Party have themselves instructed a visualisation consultant to prepare modelled visualisations to show the potential impact of the development on a small sample of views. These are attached as **Appendix B**.

4.6 I was not involved in this instruction, and am therefore unable to vouch for the reliability of these images, the basis for which is explained in the Appendix.

Influences on Visual Amenity

4.7 Viewing opportunities in/around the site are generally restricted to a sequence of mainly short/medium-range views. There are few longer-distance vistas, where open or wooded skylines assist orientation, and even fewer where built features such as the Gas Compressor Station can be said to be intrusive. Landmarks are confined to recognizable features such as Sotby Wood and Corner Farm – and even a distant view towards Lincoln Cathedral (in clear weather) from elevated ground.

4.8 Views are overwhelmingly rural in character, reflecting the dominance of arable farming as a land-use. The importance of this as an "outstanding quality" of the NL has already been highlighted, and applies equally to the scenic quality of the surrounding area, including the site. Arable farming contributes to this quality through seasonal change, and by maintaining openness within the context of the established pattern of hedgerows, tree-belts and woodlands.

5. Technical Critique of LVIA Visual Material

5.1 The technical critique of the visual material (ZTV and photography) in the LVIA is attached as **Appendix A**. The key points arising from it may be summarized as follows:

- The absence of visualizations/wirelines/montages;
- The lack of an evidential basis for the LVIA conclusions, or on which others may form their own conclusions;
- Consequential doubts about the degree of mitigation that would be achieved by the proposed landscaping;
- The lack of evidence of 3D modelling as a basis for the ZTV;
- The somewhat basic nature of the equipment used (although the photography itself has been carried out in excellent conditions);
- Failure to comply with the TGN06/19 presentational guidance – for example, the images are too small; and
- A lack of evidence on which to verify the accuracy of the photography, e.g. to confirm whether it captures the full extent of the site/development.

5.2 LVIA 2.2.2 states the following: "*In accordance with the guidelines and best practice, LVIA uses a combination of quantitative and qualitative information including informed and reasoned professional judgement. The assessment of the scale of landscape and visual effects follows a systematic and consistent step-by-step process so that rational and transparent conclusions can be drawn.*"

5.3 Whilst the process has indeed been "systematic and consistent", the deficiencies in the visual material, and especially the absence of visualisations, does not provide a reliable evidence base on which the

appropriateness of the "reasoned professional judgement" that follows can be verified.

5.4 The concerns raised in relation to the visual material are such that the LVIA has not complied fully with the guidance set out in TGN06/19: Visual Representation of Development Proposals [CD6.10], which has notably not been included in the LVIA's citing of good practice guidance.

6. The Development and its Sources of Impact

6.1 The proposed development is described in LVIA Section 3. Rather than repeat this, I should like to highlight those aspects that are of particular relevance to its landscape/visual impact, as summarised below.

6.2 Site coverage: The Proposed Layout Plan 02 [CD1.24] is reproduced below as **Figure 6.1**. It is noted that the LVIA does not report the proportion of the site that would be covered by panels. However, as the plan demonstrates, this would be significant, with open ground confined to access routes, offsets from site boundaries and the pipeline easement.

6.3 The panels would be laid out in a series of parallel rows so as to minimise overshadowing. The rows would be contained within existing field boundaries and surrounded by security fencing, CCTV cameras and (in selected locations) additional hedgerow planting

Figure 6.1: Proposed Site Layout

6.4 Panel Height: LVIA 2.1 states that the top edge of the panels would be no higher than 3m above existing ground level). By way of comparison, this is broadly equivalent to the height of a residential storey, and is well above normal eye-level (1.65m).

6.5 The height and density of the panels will be sufficient to obstruct ground-level views across the fields, depending on orientation and topography. Whilst some hedgerows in the area already appear to achieve this height, many do not (typically being @ 1.5m).

6.6 This helps to sustain an overall perception of openness, from which the surrounding land-use pattern and landscape character can be appreciated. Openness also maintains the visual relationship between historic buildings and their setting (e.g. in relation to Corner Farm, which adjoins the site), and between individual dwellings and the communities of Hatton, Sotby and Great Sturton.

6.7 The panels will be identifiable as new examples of generic renewable energy infrastructure, of which there are currently none in the local area. They are therefore by definition an uncharacteristic feature, and are clearly unrelated to its traditionally agricultural character. In addition, the proposed substation would include a 15m high communications mast, which would also be visible well above hedgerow height.

6.8 The erosion of agricultural character would be compounded by the loss of arable cultivation within the site, the ground cover of which would be converted to grassland and wildflower meadow. The removal of arable land would reinforce the reduction in openness resulting from introduction of the panels and new/heightened hedgerows. This would in turn result in a cumulative loss of rurality, which has been identified as a key influence on scenic quality in relation to the AONB.

6.9 Once established, the combination of gapped up/new hedgerow/tree planting, especially along the northern/south-western boundaries of the site, would also contribute to the loss of openness and views. LVIA 3.5.1 states that new hedgerows would be managed at min 1.5/1.8m in height.

This is likely to be greater than many existing hedgerows, and since no maximum height is given could well be substantially more.

6.10 The LVIA states at 3.3.5 that there would be no effects from glint/glare. This is a robust assertion, that I am not convinced accurately reports the findings of the Glint and Glare Assessment/Addendum [CD2.9/2.29], which highlights the sensitivity of horse-riders as receptors and relies on the provision of mitigation. This concern has been raised in the R6 Planning POE and a Planning Condition has been proposed [CD8.20, Section 5.10 and Appendix B Section 3].

6.11 In the absence of visualizations supporting the LVIA, these concerns are difficult to refute. On the contrary, the modelled views commissioned by the R6 Party (**Appendix B**) confirm the harmful impact of the panels with regard to their height/density and their relationship to the existing hedgerow pattern and views.

6.12 I wish finally to comment on the likely duration of the effects: LVIA 3.4.1 states that the application applies to an operational period of 40 years, after which the solar farm would be decommissioned. 40 years effectively amount to 1-2 generations, and are longer than the 10-25 years that GLVIA3 5.51 defines as "long-term". For many receptors, the landscape/visual effects would be perceptible within a "whole-life" perspective.

6.13 In my view, considering the trajectory of climate change and of the policy response required to mitigate it, there is a high probability that the effects will effectively become permanent. If this appeal is allowed, and the cost regime for solar energy remains favourable, this development has the potential to become an "established site" as per NPPF163(c). It is therefore likely to be viewed favourably for subsequent renewal or life-extension of its permitted use as renewable energy infrastructure.

7. Landscape Receptors, Sensitivity and Effects

7.1 The LVIA sets out the landscape receptors, their sensitivity and the predicted effects in Table 2, on which I comment below. The landscape receptors can be summarised as follows:

- Site Features: Topography, land-use and on-site vegetation;
- Landscape Character, including
  - Site Character;
  - Character of LCA E1;
  - Character of LCA G3; and
  - Settlement Character of Great Sturton.

7.2 The LVIA considers the identified Site Features to be of Low sensitivity, derived from Medium value and Low susceptibility. I consider this to understate their sensitivity, which should be Low to Medium. In addition, I consider land-use to be of High (not Low) susceptibility, since the proposed change of use requires the current arable use to be removed, resulting in Medium to High sensitivity.

7.3 I would in addition note that the LVIA excludes explicit consideration of perceptual attributes such as openness, wildness and tranquillity, which make a positive contribution to the site and its perception. Of these, openness is probably the most important, due to its relationship to inter-visibility, identity and sense of community, and its influence on recreational and residential amenity. This is demonstrated by several of the supplementary views in **Appendix C**.

7.4 The LVIA considers Site Character to be of Medium sensitivity. In consideration of the higher sensitivity of land-use and the perceptual attributes above, I would disagree with the LVIA and assess this to be Medium to High.

7.5 The LVIA considers LCA E1 (the "host" LCA) to be of Medium sensitivity. In consideration of the implicit susceptibility of its arable land-use, and the

enhanced value suggested by the presence of the AGLV, I would assess this to be of Medium to High sensitivity (i.e. the same as the site).

7.6 The LVIA considers LCA G3 to be of High sensitivity, noting the presence of the AONB and AGLV. I agree with this assessment.

7.7 The LVIA considers the Settlement Character of Great Sturton to be of Medium sensitivity. I have two comments to make in relation to this. Firstly, I question whether this should correctly be regarded as of Medium to High sensitivity, in view of the presence of listed buildings and the contribution of an open farmland setting to the character of this intrinsically rural settlement.

7.8 Secondly, I question whether settlement character as a landscape receptor should extend to include the neighbouring settlements of Hatton to the west of the site and Sotby to the north. LVIA Figure 9 shows the visual influence of the development as extending towards the former, but not the latter. However, the sensitivity of these scattered settlements is increased by the degree to which inter-visibility between them is sustained by the intervening arable farmland, including the appeal site, and by the views gained from the lanes and PRoWs that connect them.

Summary of Landscape Effects

7.9 **Table 7.1** below provides a summary of the landscape sensitivity and effects from the LVIA, with coloured shading to show where I agree (green) or disagree (orange) – these effects relate to the operational phase only.

Table 7.1: Comparison of Operational Landscape Effects

Receptor	LVIA sensitivity	PR comment	LVIA Y1 impact + effect	PR comment	LVIA Y15 impact +effect	PR comment
Site Features						
Topography	Low	Disagree: Low to Medium	Negligible = Negligible	Disagree: Negligible to Minor	Negligible = Negligible	Disagree: Negligible to Minor
Landuse	Low	Disagree; Medium to	Medium = Minor	Disagree: Medium =	Low = Negligible	Disagree: Medium +

		High		Moderate		Moderate
Vegetation	Low	Disagree: Low to Medium	Negligible = Negligible	Disagree: Negligible to Minor	Low +ve = Negligible	Disagree: Negligible to Minor
Perceptual Attributes (nit explicitly considered in LVIA)						
Openness	N/A	Medium		Moderate to Major		Major
Wildness	N/A	Low		Moderate		Moderate
Tranquillity	N/A	Medium		Moderate		Moderate
Site Character	Medium	Disagree: Medium to High	Medium = Moderate	Disagree: Medium to High = Major	Low = Minor	Disagree: Moderate to Major
LCA E1	Medium	Disagree: Medium to High	Negligible = Negligible	Disagree: Low = Moderate	Negligible = Negligible	Disagree: Low = Moderate
LCA G3	High	Agree	None = None	Disagree: Low = Moderate*	None = None	Disagree: Low = Moderate
Gt Sturton settlement character	Medium	Disagree: Medium to High	Negligible = Negligible	Disagree: Low = Moderate	Negligible = Negligible	Disagree: Low = Moderate
Note that these effects also apply to the settlements of Hatton and Sotby, as discussed in the text						

*Indirect effect, since the site lies outside G3 – but visual impacts suggest a potential for harm

7.10 As can be seen, I agree with one of the LVIA's categorisations of landscape sensitivity: in relation to LCA G3. I consider the LVIA to have under-stated the sensitivity of all other receptors, particularly arable land-use. I also highlight the LVIA's explicit failure to consider perceptual attributes, notably in relation to openness, which will be especially susceptible to harm from the type of development proposed.

7.11 Reflecting this, I consider the LVIA to have under-stated the predicted effects at Y1, which I assess to be Major for site character (compared to LVIA Moderate) and Moderate for both LVAs (compared to LVIA Negligible and None respectively). I also disagree with the LVIA as to the degree of mitigation that would be achieved by the proposed landscaping, since this would not by Y15 reduce the physical or spatial impact of the panels. On the contrary, it would reinforce their harmful visual impact on openness as additional hedgerow planting becomes established.

7.12 In summary, the proposed development would displace the existing arable use and historic landscape character of the site, as described in the East Lindsey LCA. This use/character would be replaced with solar energy

infrastructure that is highly uncharacteristic of the area, and amounts to a significant increase in its developed character. This impact would also directly affect the setting of listed Corner Farm, and would result in a material loss of openness. This loss of openness would be reinforced as mitigation planting matures, giving rise to harmful impacts on views and visual amenity, as discussed in the following section.

8. Viewpoints, Visual Receptors and Visual Effects

8.1 I consider the range of viewpoints identified in the LVIA to be broadly representative of the locations from which the visual impacts of the development are likely to be experienced. Following my own fieldwork, I summarise in **Table 8.1** below the assessment of visual effects from the LVIA, and comment on where I agree (green shading) or disagree (orange shading) with their conclusions.

8.2 In carrying out this exercise, and mindful of the concerns raised by the R6 Party in their SoC, I have identified a number of supplementary viewpoints which I consider could have usefully been included in the LVIA. A photographic record of these is provided at **Appendix C**, and a summary of the predicted effects on them is set out in **Table 8.2**.

Table 8.1: Comparative Effects on LVIA Viewpoints

LVIA VP	LVIA Impact + Significance Y1	PR Comment + Explanation	LVIA Impact + Significance Y15	PR Comment + Explanation
1	High = Major	Agree – panels would be seen end-on at close range, blocking the view across the field	Same as Y1	Agree – although screening by panels would be replaced by screening hedgerow
2	High = Major	Agree – open view across field would be blocked by panels	Low = Moderate	Disagree: Medium to High = Moderate to Major – panels would continue to fill open view across field
3	Low = Minor	Disagree: Medium = Moderate to Major – panels would infill open views across field + probably form skyline	Negligible = Negligible	Disagree: Minor to Moderate – roadside hedgerow likely to provide screening, but would also foreshorten view
4	Medium = Moderate	Disagree: Medium to High = Moderate to Major – panels would infill open field +	Low = Minor	Disagree: Medium = Moderate – grown-out hedgerow would largely block

		potentially form skyline		view
5	Medium = Moderate	Disagree: Medium to High = Moderate to Major – panels would infill open field and potentially form skyline	Low = Minor	Disagree: Medium = Moderate hedgerow would be gapped-up and grown-out, blocking view across field
6	Low = Minor	Disagree: Medium = Moderate – panels would partially infill fields + potentially create a skyline feature	Negligible = Negligible	Disagree: Low to Medium = Minor to Moderate – hedgerows allowed to grow-out and largely block view
7	Low = Minor	Disagree: Medium = Moderate – panels would be visible in middle-ground	Negligible = Negligible	Disagree: Low = Minor: New hedgerow would provide screening
8	Negligible = Negligible	Disagree: Medium = Moderate – panels visible in middle distance beyond gappy hedgerow	Negligible = Negligible	Disagree: Low = Minor - New hedgerow would create foreshortened view
9	Low = Moderate	Agree – panels visible in middle distance in front of Sotby Wood	Negligible = Minor	Disagree: Negligible to Low = Minor to Moderate: New hedgerow would foreshorten view
10	Medium = Moderate	Agree: Proposed substation introduced into field in front of existing	Low = Minor	Disagree: Medium = Moderate – Landscape plan shows no planting around substation
11	Medium = Major	Agree: Proposed substation visible in front of existing	Low = Moderate	Disagree: Low to Medium = Moderate to Major – Landscape plan shows no planting around substation
12	Negligible = Negligible	Agree	Negligible = Negligible	Agree
13	Low = Minor	Agree	Negligible = Negligible	Disagree: Low = Minor: New

				hedgerow screens N edge of panels
14	None = None	Disagree: Low = Minor – Receptors include residential views	None - None	Disagree: Low = Minor (same as Y1)
15	Low = Minor	Disagree: Low to Medium = Moderate – Receptors include residential views	Negligible = Negligible	Disagree: Low = Minor
16	None = None	Disagree: Low = Minor (assumes potential visibility in winter)	None = None	Disagree: Low = Minor (hedgerow planting of limited effect at this distance)
17	None = None	Agree	None = None	Agree
18	None = None	Agree	None = None	Agree
19	Low = Minor	Agree – but note potential for residential receptors	Negligible = Negligible	Disagree: Negligible to Low = Minor – hedgerow planting of limited effect at this distance
20	Low = Minor	Agree	Negligible = Negligible	Disagree: Negligible to Low = Minor – hedgerow planting of limited effect at this distance
21	Low = Minor	Agree	Negligible = Negligible	Disagree: Negligible to Low = Minor
22	Low = Minor	Agree	Negligible = Negligible	Disagree: Negligible to Low = Minor
23	None = None	Agree	None	Agree
24	None = None	Agree	None	Agree

8.3 In terms of the Y1 effects, I agree with the LVIA in relation to 15 of the viewpoints, but disagree in relation to the remaining 9.

8.4 In all of these 9 cases, I consider the LVIA to have materially understated the predicted effects, by at least half an order of magnitude (e.g. minor to moderate rather than minor) and often by a whole order of magnitude (e.g. moderate rather than minor).

8.5 Of these 9 views, I consider the majority (7) to give rise to potentially significant (i.e. moderate or above) effects as defined at LVIA 6.5.4. Whilst the LVIA considers the Y1 effects to be potentially significant for 7 viewpoints. my review suggests that the effects at a further 5 viewpoints could be significant. This amounts to a material increase in the proportion of potentially significant effects.

8.6 I believe that the difference between us results from two areas of divergence. The first relates to the combined impact of the panels and related features (e.g. fencing, CCTV, access tracks) at Year 1 on the fields themselves, which would lose both their arable character and openness, allowing energy infrastructure to become the dominant feature.

8.7 The second relates to the sensitivity of the views/receptors, which should predominantly be assumed to be high, even where views are gained from nearby lanes. Receptors comprise a combination of recreational walkers, horse-riders and local residents, who should all be assumed to be potentially highly sensitive to visual change.

8.8 At Y15, I agree with the LVIA effects for six of the views. I consider the JBA assessment to have otherwise materially over-estimated the degree of mitigation provided by the proposed planting, and to have thereby under-estimated the severity of the residual effects.

8.9 This is particularly the case in relation to viewpoints looking to/from Corner Farm, in terms of both its historical significance and its prominence as a local landmark, as shown in particular by the supplementary views (**Appendix C**). This point is highlighted in the R6 Party POE on Heritage [CD8.18].

<u>Commentary on the Predicted Effects</u>

8.10 The visual assessment tables in the LVIA repeat several sentences in order to justify its judgments. I quote these below, with my comments added.

- "*The key landscape elements of the surroundings, such as the vegetated field boundaries and treebelts, remain intact*." Whilst this is correct, the key landscape element of the open fields themselves would be infilled by the panels, which would also screen much of the surrounding vegetation.

- "*Over time, strategic landscape mitigation will screen the proposals from this view*". Whilst this may be correct to varying degrees, the resulting loss of the view itself will also be harmful, where this currently contributes to openness and amenity.

- "…*the dark muted and matte colours of [the panels] would help [them] to blend in with the dark muted colours of the wooded landscape it sits within*". The landscape is only partially wooded, and materially so only where the development is seen in the context of Sotby Wood. The panels are "dark muted and matte" only when their back or underside is prominent, and their appearance will vary significantly according to weather (and especially sunlight) conditions. Seasonality will also be an influence, with the dark tones of the panels especially prominent when the crops in the surrounding fields are turning golden approaching harvest.

8.11 The LVIA considers that only three of the 24 views (VPs 1, 2 and 11) would experience residually significant effects [LVIA Table 3]. My review suggests that the residual effects on VPs 4, 5 and 10 should also be considered to be potentially significant, i.e. double the number of viewpoints considered to experience significant effects in the LVIA.

<u>Supplementary Viewpoints</u>

8.12 The supplementary viewpoints identified during the course of fieldwork are shown on the plan and photos in **Appendix C**. The justification for these views, as set out in the R6 Party SoC [CD8.7], is that the LVIA fails to take account of all potential receptors, particularly residential properties. These are not referred to at all in LVIA pages 28-51, except in so far as local residents may also be road users or users of footpaths/bridleways.

8.13 This may result in part from the statements at LVIA 1.2.1 and 5.5.41 that "*the northern boundary [of the site] is entirely screened by Sotby Woods*". However, this is incorrect, since four properties immediately to the north of the site (Greenacres, Moor Farm, Swallow Barn and Owl Cottage) would potentially experience views towards the solar farm.

8.14 The supplementary views have been identified in order to highlight the potential for impacts on residential amenity, the AGLV and the recreational amenity of views from PRoWs and bridleways, so as to augment the analysis in the LVIA.

8.15 The viewpoints are described in **Table 8.2** below, which for each view explains their relevance and comments on the potential Y1 and Y15 effects, so as to be consistent with the LVIA.

Table 8.2: Analysis of Supplementary Viewpoints

VP/Location	Y1 Impact + Effect	Y15 Impact + Effect
A – Views from Sotby (potentially within AGLV) to Great Sturton and Corner Farm	Solar farm would occupy further half of large open field, introducing built development/land cover, with the panels facing away from1 the viewer. This is considered to amount to a Moderate effect on the standard view, becoming Major at close-range/zoomed version.	An establishing hedgerow along the visible edge of the solar farm is likely to provide a substantial degree of screening of the nearest panels. However, the panels are likely to remain at least partially visible beyond, introducing a partially developed skyline. This is considered to amount to a Minor effect on A1, becoming Moderate on A2.
B1 + B2 – Views from road and PRoW at	The solar farm would be seen as a change of land cover within the furthest field, amounting to a Minor effect on	There is likely to be little visible change to this view, unless planting is used to fill gaps in the intervening tree-line.

Sotby (within/close to AGLV)	the standard view and a Moderate effect on the zoomed version.	The effect is likely to remain Minor/potentially Negligible on the standard view.
C – Views from Sycamore Farm, Sotby	The solar farm would be seen as a change of land cover within the furthest field, amounting to a Minor effect on the standard view and a Moderate effect on the zoomed version.	There is likely to be little visible change to this view, unless the intervening hedgerow is allowed to grow-out. The effect is considered to remain Minor/potentially becoming Negligible.
D – Views from PRoW (Lindsey Trail)	The solar farm would be seen from Sycamore Farm (GII listed + within AGLV) as a change of land cover within the furthest field and the immediate setting of Corner Farm. This would amount to a Minor effect on the standard view, and a Moderate effect on the zoomed version	There is likely to be little visible change to this view, unless the hedgerows forming the N/E boundaries of the site are gapped-up and allowed to grow out. The effect is considered to remain Minor, potentially becoming Negligible.
E – View from Great Sturton, potentially within AGLV	The solar farm would be seen as a change of land cover across the field in front of Yew Trees. The effect is considered to be Minor to Moderate, with a perceptible increase in developed character.	There is unlikely to be a material change from Y1, such that the effect would remain Minor to Moderate.
F1-3 – Views (in different directions) for residents and road users	The panels would occupy the fore/middle-ground, obstructing the distant views towards Sotby (F1-2) and Hatton (F3), in which the panels would introduce a change to land cover. The effect is considered to be Major, with the panels dominating and obstructing the view.	With gapping-up and growing-out of the existing hedgerow, planting is likely to obstruct the view of the nearest panels to varying degrees. The effect is likely to become at least Moderate, assuming substantial screening of the panels, but also obstruction of the view.
G1 – Views from permissive path across site	The framed view beyond the bridge would be occupied by a rear view of the panels, largely obstructing the view towards Corner Farm. The effect is considered to be Moderate to Major.	The view is likely to remain largely unchanged, and the effect Moderate to Major.
G2	The solar farm will occupy the arable field, seen front-on potentially forming the skyline. The effect is considered to be Major.	If a hedgerow is proposed between the permissive path and the panels, the effect could be reduced to Moderate, but still adverse due to loss of the view. If not, the effect is likely to remain Major.
G3	The view would be dominated by the back of the panels, seen probably seen as a skyline feature, reducing the visibility	If a hedgerow is proposed between the permissive path and the panels, the effect could be reduced to Moderate, but

	of Corner Farm, The effect is considered to be Major.	still adverse due to loss of the view. If not, the effect would remain Major.
G4	The panels would occupy most of the arable field, seen end-on and potentially as a skyline feature. The effect is considered to be Major.	If a hedgerow is proposed between the permissive path and the panels, the effect could be reduced to Moderate, but still adverse due to loss of the view. If not, the effect would remain Major.
H – View from permissive path S of Sotby Wood	The panels would occupy most of the arable field, seen end-on and partially from the rear, probably as a skyline feature. The effect is considered to be Major.	If a hedgerow is proposed between the permissive path and the panels, the effect could be reduced to Moderate, but still adverse due to loss of the view. If not, the effect would remain Major.
I 1 + 2 – Views from PRoW and rear of properties (e.g. Yew Trees)	The front/sides of the panels would be seen as a new land cover within the distant field, with their sou. The effect is considered to be Minor to Moderate.	As the hedgerow along the edge of the panels becomes established, the closest rows are likely to be screened. The effect is likely to become Minor, potentially Negligible.

8.16 These views will show the solar farm over a range of distances, from distant to close-range, with consequential variations in its impact. At Y1, the effects are predicted to be significant for 10 views: VPs A, F1-3, G1-G4 and H. By Y15, it is considered that the effects could remain significant for 8 views: VPs F1-3, G1-G4 and H, depending on the degree of screening/obstruction achieved by the new hedgerows.

8.17 This analysis has highlighted the potential for significantly adverse effects to be associated with more than half of these supplementary views. The views highlight the sensitivity of the various sections of PRoW and permissive path around the site, the presence of residential properties, and the recurrence of Corner Farm as a local landmark.

9. Summary and Conclusion

9.1 This proof of evidence, presented on behalf of the R6 Party, has reviewed the LVIA as a basis for highlighting areas of concern and agreement/disagreement between us. In order to minimise repetition, I have not carried out my own standalone assessment, and have instead structured my comments on the receptors and effects reported in the LVIA.

Landscape Context

9.2 There is little dispute between us in relation to the published character areas. The site is located within district-wide character area E1: Wragby to Horsington Vale Woodland and Farmland and national character area (NCA) 44 Central Lincolnshire Vale. It is relatively close to the boundary with character area G1: Hainton to Toyton All Saints Wolds Farmland and NCA43: Lincolnshire Wolds, which runs to the north-east of the site.

9.3 This boundary is perceived on the ground as a zone of transition, in which the characteristics of vale/wold and woodland/farmland tend to intermingle. This creates a locally more diverse landscape, which has been recognised by its partial inclusion within an Area of Great Landscape Value (AGLV).

9.4 Whilst differences in scale make it difficult to pinpoint the boundaries of the AGLV, the site probably lies outside, but very close to it. As a result, it is likely that a number of receptors, including residential properties and users of PRoWs, may lie within the AGLV. The presence of the AGLV reflects a general increase in landscape value towards the Lincolnshire Wolds AONB/NL, the boundary of which is located c3km north-east of the site.

9.5 This increase in value supports an increase in sensitivity, which has not in my view been acknowledged in the LVIA. Whilst I agree with the LVIA's categorisation of high sensitivity for LCA G1, I consider that LCA E1 should be regarded as being of medium to high (rather than medium) sensitivity.

9.6 I also consider that the sensitivity of arable land-use should be regarded as medium to high (rather than the medium stated in the LVIA), due to its

susceptibility to change under the proposed development, and its contribution to scenic quality, as recognised in relation to the AONB.

Visual Context

9.7 The site/development are potentially visible from a range of short- to medium-range views in the local area. The LVIA has identified 24 assessment views. Whilst I consider these to be reasonable and broadly representative, a number of supplementary views have been identified, in order to reflect concerns raised by the R6 Party, as shown in **Appendix C**.

9.8 Viewing opportunities are generally confined to surrounding lanes, PRoWs/permissive paths within/adjacent to the site, together with nearby residential properties.

Technical Critique of LVIA

9.9 I have commissioned a technical review of the visual material supporting the LVIA, which is reported in **Appendix A**. Overall, the material is not considered to provide a reliable evidential basis for the LVIA, requiring a greater reliance on judgment than is desirable.

9.10 This relates especially to the absence of verified photography and visualisations, in the context of which the R6 Party have prepared their own 3D images to show the likely impact of the development, as presented in **Appendix B**. Whilst I cannot necessarily vouch for their technical accuracy, I consider these images to be helpful.

Landscape Effects

9.11 I agree with one of the LVIA's categorisation of landscape sensitivity: in relation to LCA G3. I consider the LVIA to have under-stated the sensitivity of other landscape receptors, particularly land-use. The LVIA has also failed to explicitly consider perceptual attributes, notably in relation to openness, which is especially susceptible to harm from the type of development proposed.

9.12 As a result, I consider the LVIA to have under-stated the predicted effects at Y1, which I assess to be Major for site character (compared to LVIA Moderate) and Moderate for both LCAs (compared to LVIA Negligible and None respectively). I also disagree with the LVIA as to the degree of mitigation that would be achieved by the proposed landscaping, since this would have no effect on the physical or spatial impact of the panels, and would reinforce their harmful visual impact on openness.

Visual Effects

9.13 In terms of the Y1 effects, I agree with the LVIA in relation to 15 of the viewpoints, but disagree on the remaining nine. I consider the LVIA to have understated the predicted effects generally by between half to a whole order of magnitude for these nine views.

9.14 As a result, I consider the majority to give rise to potentially significant (i.e. moderate or above) effects as defined at LVIA 6.5.4. Whilst the LVIA considers the Y1 effects to be potentially significant for 7 viewpoints, my review suggests that the effects at a further 5 viewpoints could also be significant.

9.15 At Y15, I agree with the LVIA conclusions for six of the views. For the remainder, I consider the LVIA to have materially over-estimated the degree of mitigation achieved by the proposed planting, and to have thereby under-estimated the severity of the residual effects.

Conclusion

9.16 Whilst the LVIA broadly complies with the (GLVIA3) guidance, technical concerns combine with questions over matters of judgment and interpretation to undermine its reliability as a basis for assessing the landscape/visual effects. I can best illustrate this by responding to some of the statements in LVIA Section 8.5 as follows:

9.17 LVIA 8.5.1: *It should be acknowledged that any development will give rise to change in the landscape of the area and the views of receptors*. This

sounds very much like the familiar "inevitability" argument. Such changes only become inevitable if they are found to be acceptable, which is the purpose of this inquiry.

9.18 "*The degree of change will influence the judgement on acceptability and will need to be balanced with the overall benefits delivered by the scheme*". This is a matter for the planning balance, and should not be affecting the judgment of landscape witnesses.

9.19 LVIA 8.5.2*: "Although there will be localised visual and landscape effects, the proposed development will not dominate the view and will be a small component within a wider landscape."* Whilst it is agreed that the effects would be relatively localised, they would be recurrently experienced within the local area. It should also be noted that they will include generic sources of harm such as the loss of arable land-use and openness, and the introduction of built development onto greenfield land. Localised does not mean insignificant.

9.20 *"Strategic landscape infrastructure, retained mature hedgerows and enhancement of existing vegetation will help to visually integrate the development into the surrounding landscape*." In other words, the landscape infrastructure would help to screen the intrusive and uncharacteristic appearance of the development. At the same time, this landscaping would itself be a source of harm by reducing openness and visual amenity.

9.21 LVIA 9.5.3: "*The proposal responds to the local context in terms of character and visual sensitivities*." It is not clear that a meaningful response has been achieved, e.g. in relation to offsets from PRoWs or within the setting of Corner Farm. The appearance and extent of the proposal are intrinsically harmful to the character and visual sensitivities of this locally valued agricultural landscape.

9.22 "*The nature of the solar PV panels, ease of removal at end of useful life and the minimal impact to landscape character and visual amenity,*

lend this Site to the proposed use." The nature of solar panels, notably their scale and appearance, is intrinsically unsympathetic within a predominantly arable landscape with proximity to recreational and residential receptors. As I have argued in this proof, there is a potential for this use, if allowed, to be life-extended or modified through subsequent applications. And as I have also demonstrated in this evidence, the landscape and visual effects cannot be described as "minimal".

9.23 LVIA 1.1.6 refers to the three objectives that JBA have sought to address in the design and assessment process as follows:

a. Aspects which make an essential contribution to landscape character are maintained and managed;

b. The development and associated change can be accommodated within the existing landscape and visual context; and

c. Improvements and enhancements can be made where uncharacteristic features detract from the character and visual amenity of the area.

9.24 I would comment on these as follows:

a. Whilst field boundaries have been maintained, and would be managed to provide enhanced biodiversity and increased screening, the arable use and openness of the fields themselves – which is critical to both landscape character and visual amenity – would be lost.

b. The solar farm can of course be accommodated spatially within the site. But that is not what is meant – the definition should be "accommodated without detrimental and fundamental landscape/visual impact." That clearly would not be the case.

c. The solar farm qualifies as an uncharacteristic feature that detracts from the character and visual amenity of the area. The "improvements and enhancements" may well benefit biodiversity, and would help to screen the detrimental appearance of the solar farm. But the latter purpose

would reinforce the loss of openness and views, and does not qualify as a net benefit.

9.25 In view of the concerns I have highlighted with the LVIA, and its under-reporting of the potentially significant effects, I consider it to provide an unreliable basis for the determination of this appeal. If landscape and visual matters were the only consideration, I believe my evidence to demonstrate a level of harm sufficient for the appeal to be dismissed.

APPENDIX A

MSenvision Technical Review of LVIA Visual Material

Hatton Solar Farm

Technical Review Undertaken by Michael Spence BA(Hons), MLD, CMLI, REIA, FRGS

for Peter Radmall Associates

Introduction

Mike Spence is founder of MSEnvision Ltd, an independent company providing confidence in ZTV, photography and visualisation work. Mike is a Chartered Landscape Architect, Registered EIA Practitioner and Fellow of the Royal Geographical Society, with over 35 years professional experience. Mike was one of the technical authors behind the Landscape Institute's TGN06/19 and worked for SNH (now NatureScot) on their windfarm visualisation guidance in 2015, and most recently in 2023. He worked closely with the LI between 2013 and 2019 providing training and technical guidance. Since 2019, Mike has been a member of IEMA's Technical Steering Committee, the LI Technical Committee and produced a Technical Guidance Note on ZTVs for the LI. He was also the lead technical author for the Landscape Institute's Technical Competency areas, for Digital Technologies and Photography/Visualisations.

Mike and his team at MSEnvision have produced photography, surveying, GIS support and 3D modelling for many projects since 2000. In recent years the team has worked on many NSIP solar farm projects across the UK.

Mike has also given evidence at many Public Inquiries and Planning Appeal.

His background includes working alongside SNH(NatureScot), National Trust, Historic Royal Palaces, Friends of the Earth, Historic England, English Heritage, the Environment Agency, many local authorities, and many developers. He works internationally and is a highly respected technical authority on technical photography and visualisations.

Documents Reviewed

Hattons Solar Farm, LVIA December 2021 by James Blake Associates

Appendix C Visibility Assessment Methodology – NEO Environmental

ZTVs

Figure 9 presents the JBA ZTV.

It appears that JBA have followed poor practice with the calculation of ZTVs.

In para's 2.4.4 to 2.4.12 JBA explain their approach to the calculation of theoretical visibility. However these paragraphs appear to explain a ZTV for 8metre tall buildings. Not a 3metre high solar farm. It is difficult to work out whether JBA have simply failed to correctly explain their ZTV approach or why they have used 8 metres.

In para 2.3.7 JBA explain that they have used DTM data to calculate a bare earth ZTV. There is no bare earth ZTV present in the LVIA.

JBA do not explain how many target points have been used for the calculation.

JBA do not present a bare earth ZTV, which is normally presented to understand what the visual envelope of the development will be.

JBA simply present a 'screened' ZTV. But they fail to explain the heights used in their screened ZTV calculations.

The result is a ZTV which is too simple, and potentially inaccurate, to form the basis of a comprehensive and thorough LVIA for 3m high solar panels.

Photography and Visualisations

The camera equipment used by JBA is 'entry level' equipment . The camera used is the Nikon D3100, which is a cropped frame sensor camera. It is unclear which lens has been used.

The panoramas suggest all viewpoint panoramas have been taken 'hand-held'. As a result the panoramas images are likely to have a large amount of distortion within them and will not match the view from the viewpoint location.

A simple review of the camera locations suggests that the locations of the cameras haven't been accurately surveyed. Viewpoint 7 appears to be within 4-6 metres of the coordinates given. The ground level given in appears to be somewhat incorrect. According to the LIDAR

DTM at this location, the ground level is 36.56mAOD. However, the height given on the image is 38mAOD.

This illustrate that the camera locations used for the photography have not been surveyed. As a result, there will therefore be inaccuracies built into both the 3D modelling and the visualisations.

It is standard practice to include some level of visualisation when presenting landscape and visual impact assessment.

However, no visualisations could be found in the report. Just simple panoramas for Viewpoints 1 to 24.

When presenting photography there are some relevant standards contained in LI TGN06/19. The panorama must be presented in a standard technique, which is a 90 degree image on an A1 wide sheet.

JBA have presented all their panoramas on an A3 sheet.

The presented images are far too small to be able to communicate any important features within the image.

JBA present a horizontal indication of where the site is within the view but fail to identify the precise vertical location.

Viewpoint 1 is a 180 degree view, presented on an A3 sheet. This size fails to meet any guidance requirement. And considered far too small to be representative of the actual view.

Some viewpoints are obviously from a single viewpoint location, but JBA have split them into 2. For example viewpoints 4 and 5.

Some viewpoints fail to capture the full site extents. For example viewpoint 3, 6, 13, 22 and 24.

Some viewpoints show the incorrect site extents. For example Viewpoint 14.

Viewpoints 15 and 16 have been taken into the sun and as a result is far too overexposed. This viewpoint should be re-taken in the morning so the sun doesn't affect the view towards the site. JBA have failed to identify the site in Viewpoint 16 possibly because the image is so poor.

Viewpoint 17 is presented as a single frame image, lacking context. The site extents have not been identified in the view.

Viewpoin18 fails to identify the site extents.

Viewpoints 19, 20 and 21 are presented too small that there is little detail of the site in the image.

It is clear that JBA have not prepared a 3D model of the proposed solar farm and it is unclear whether JBA actually understand precisely where the solar farm lies in many of their views, as presented.

It is standard practice to:

1. Identify the site extents
2. Construct a 3D model
3. Produce wirelines to show how the view will change after development
4. Produce photomontages to illustrate the likely impact

None of the above have been carried out effectively by JBA. This is considered an important omission in their work.

Technical Methodology by JBA

Paragraphs 2.4.4 to 2.4.15 explain JBA's approach to their ZTV calculation and their photography.

Visibility Assessment NEO Environmental

This report appears to present evidence of the impact of the development on what are referred to as 'residential receptors'. The report includes 14 'residential receptors'. Although there is no Viewpoint 12.

However, none of the receptrors appear to be residential.

All viewpoints are actually from either bridleways, public rights of way or tracks. These are not 'residential' receptors.

The is no photograph presented for Viewpoints 1, 2, 10 and 11.

There is no receptor 12.

Receptors 13 and 14 have just one photograph. It is unclear which of the Viewpoints this is relevant to.

There is no explanation of what these images actually explain. Yellow and green colours have been used across the site, which has been removed and replaced with white.

The Neo Environmental 'Visibility Assessment' is not explained anywhere and it is difficult to understand precisely the reason for including this alongside the LVIA.

The document, as it currently stands, provides no helpful information to add to the LVIA.

Summary and Recommendations

Paragraphs 2.4.4 to 2.4.15 cover JBA's Technical Methodology. No visualisations or photomontages have been prepared.

The Technical Methodology specifies that the ZTV is calculated for 8m tall buildings. It doesn't mention 3metre tall solar panels. The ZTVs are therefore confusing.

The camera equipment appears to be basic. However, the photography has been captured in excellent conditions.

JBA demonstrate poor understanding in terms of presentation size. None of the viewpoint images are presented at a size that conforms with LI TGN06/19.Theyare simply far too small. A fundamental requirement of LI TGN 06/19 is that the full development is presented. Whilst many of the viewpoints may capture the full extents of the development this isn't correctly labelled. It is unclear whether JBA have been sufficiently accurate in their labelling to have confidence in the location of the solar farm, particularly in some of the more distant viewpoints.

The LVIA as presented, contain no visual representations. There is no inherent accuracy in the photography. There is no evidence of any 3D modelling. It is extremely unusual to review an LVIA with no visualisations at all. In fact, this is the first LVIA that I have reviewed that fails to include them.

In summary, in my opinion, there are too many issues with the ZTV, the photography, lack of 3D modelling and no visualisations to be able to consider the LVIA reliable in understanding the impacts of the proposed development on the viewpoints and landscape. Nothing has been presented to be able to understand how the assessment has been undertaken. This therefore cannot be assumed to provide a sound basis for assessment purposes.

It is recommended that a ZTV is prepared correctly to understand the limits of likely visibility, followed by a review of viewpoint locations. The photography should be fully

recaptured using the correct equipment on a levelled tripod. A complete solar farm 3D model is constructed with all elements present. Wirelines should be produced to demonstrate visibility of all elements from each viewpoint. And the full extent of view of the development from each viewpoint should be presented, to include both winter and summer views.

MSpence 17 July 2025

APPENDIX B
3D Visualisations

APPENDIX B - 3D VISUALISATONS

1. Background

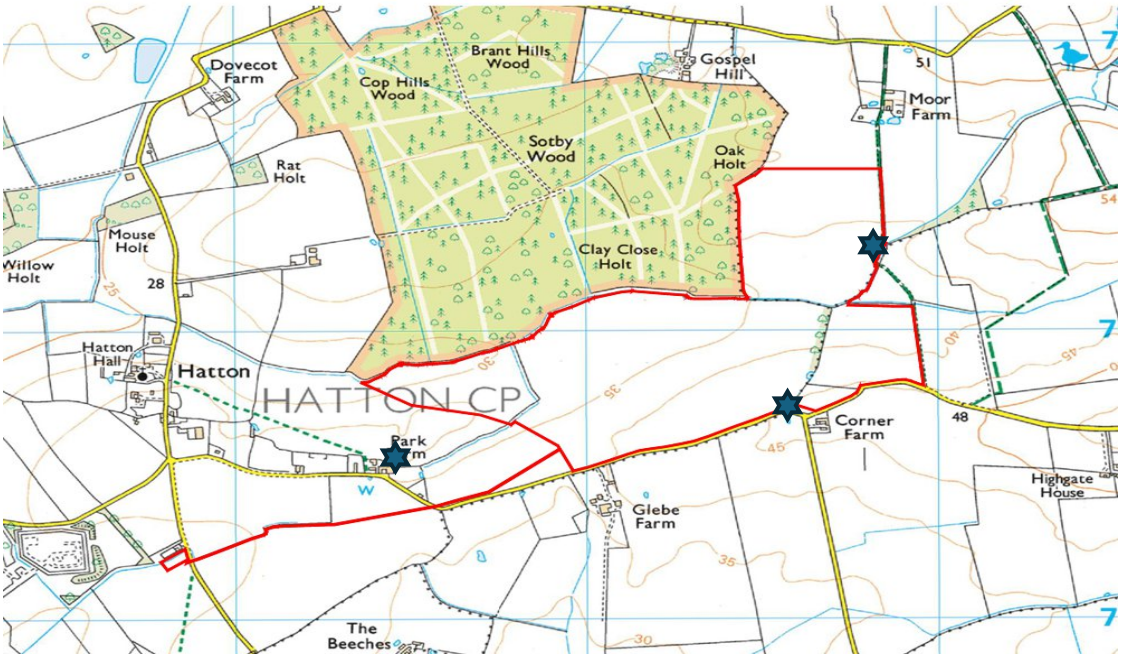
a. In the absence of any 3D Visualisations being provided within the Appellant planning documents that clearly and appropriately demonstrate the visual impact of the solar panels and associated infrastructure on the current rural landscape, the Hatton Action Group (THAG) commissioned an architectural modelling company, Modunite, to carry out 3D visualisations of the proposal.

b. Modunite specialises in producing high-quality CGI visualisations tailored for developers, architects, and builders seeking 3D representations of their projects and developments. Established in 2021, the company has cultivated a client base, serving over 600 clients across the UK.

c. This work was commissioned in June (at the time of writing the R6 Statement of Case) and was carried out independently of the work carried out by Peter Radmall Associates .

2. Basis

a. The background views that forms the basis for the subsequent modelling utilise site photographs which taken at the approximate viewpoints shown on the site location map below. These photographs were taken with an i-phone camera held at eye-level (~1.65m)



b. These views were chosen as they provide a representative selection of views which will be experienced by residential properties, roadway users and PRoW from different points around the site.

c. In order to ensure the more accurate representation of the subsequent overlays, the Appellants Planning submission documents were used by Modunite to inform the design of the panels, infrastructure etc. These documents provided all necessary details required to ensure the most accurate representation possible given the information available to the Hatton Action Group at that time (e.g. panel heights, orientation, security fence type, height etc)

- CD1.1 Site Location Plan - 23rd February 2022
- CD1.2 Existing Site Layout Plan - 12th July 2021
- CD1.3 Mounting Structure Details - 11th March 2022
- CD1.4 Fence and CCTV Layout Plan - 21st January 2022
- CD1.17 Proposed Concept Plan - 9th July 2021

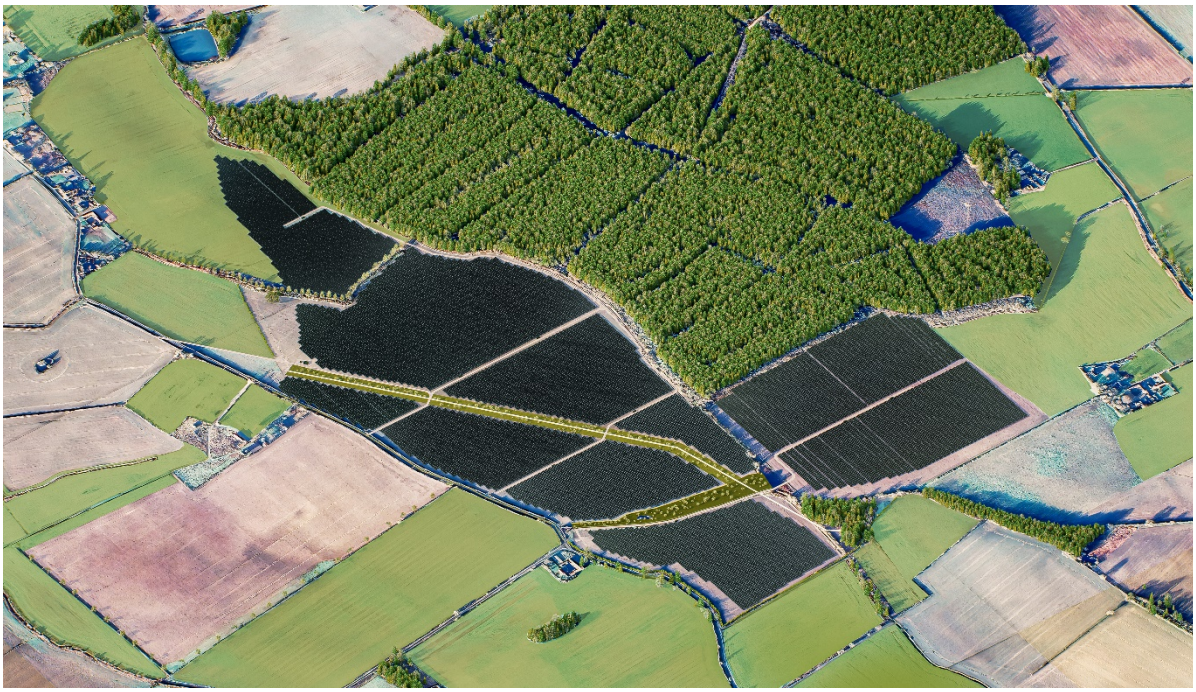
d. In addition to these three eye-level viewpoints, an aerial view of the site has also been produced to illustrate the scale of the development in comparison to the existing landmarks (e.g. Sotby Wood) and proximity to the local villages.

3. Visualisations

3.1 Aerial view of site and surrounding area

Before

After



3.2 Viewpoint from ProW to the East of the Site, facing south

Before

After

3.3 Viewpoint from South boundary, looking north-east and showing impact on Corner Farm setting

Before

After

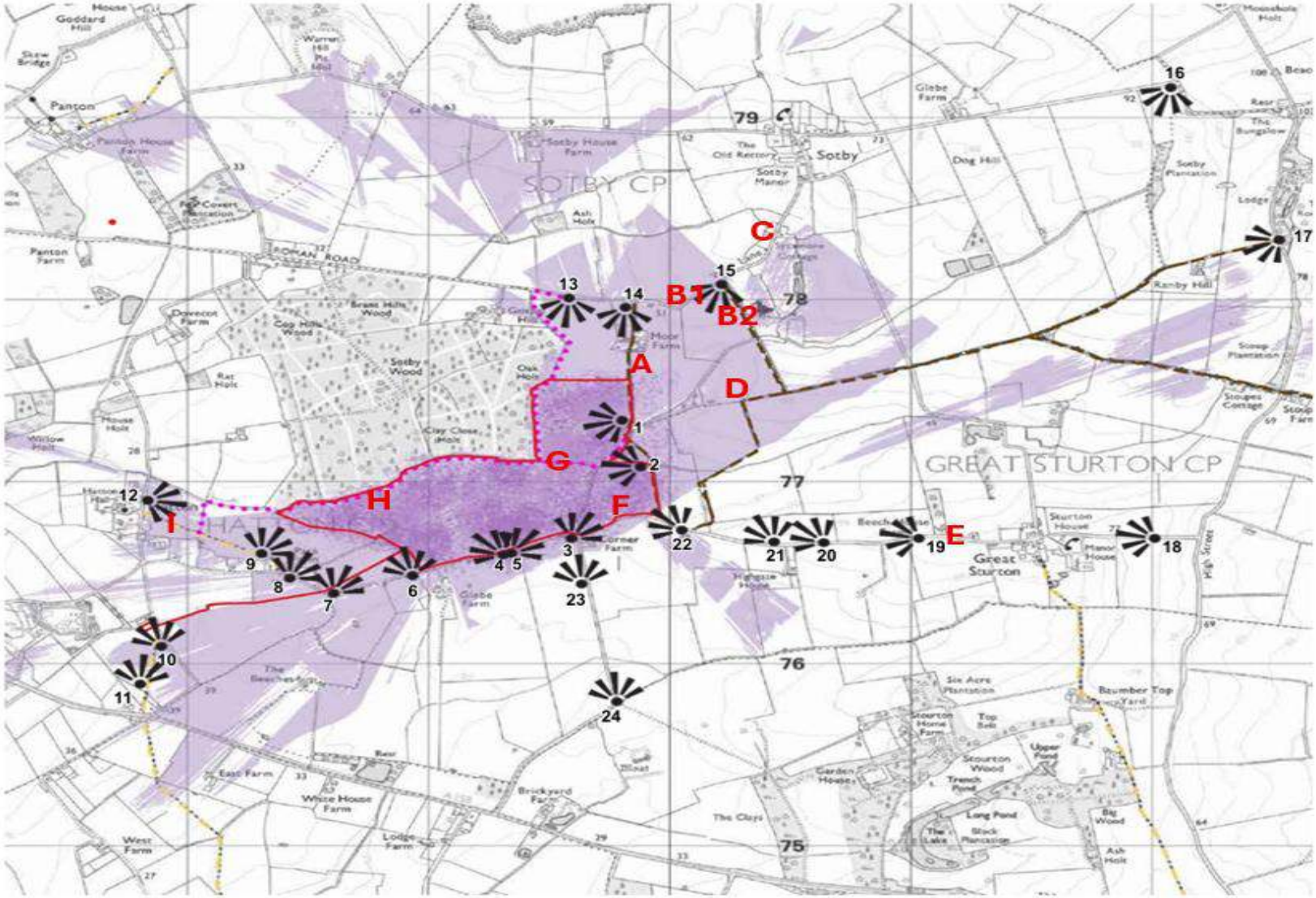
3.4 Viewpoint from West boundary, looking north-east and illustrating views from rear of properties (Old Barn)

Before

After

APPENDIX C
Supplementary Viewpoints

Appendix C: Supplementary Viewpoints



A. From end of Moor Lane, looking south towards Corner Farm on horizon. For reference, the hay-bale stack seen in the distance to the right of Corner Farm is circa 4 – 4.5m high

A1. Standard View :

A2: Zoomed View (Corner Farm highlighted):

B1 From Wass Lane (Sotby) view south through hedgerow (with Moor Farm, Swallow Barn and Owl Cottage visible to right within trees). Development site highlighted

B2: From PRoW (Sotby Meadows) view south-west towards Great Sturton(square shows Corner Farm, circle shows Glebe Farm, arrow shows development site (full width of that field) : Standard View

C1 From Wass Lane at Sycamore Farm, Sotby (Grade II listed), looking across garden (Square indicates proposed Solar farm land):

Standard View

C2: Zoomed View:

D. From Lindsey Trail (PRoW) at end of Green Lane (Rectangle indicates Corner Farm. Development site is the whole of the far (yellow) field in front of Corner Farm towards the bush in the foreground:

Standard View:

D2: Zoomed View (showing Corner Farm):

E. View from Great Sturton looking towards Hatton (Circle indicates Yew Trees, Hatton - the proposed development is the field included within the circle):

E1. Standard View:

E2. Zoomed view showing Yew Trees and the land for the proposed Solar Farm development:

F1 From Sturton Road (Great Sturton) close to Corner Farm, looking North across site (in foreground and stretching to the horizon) towards Sotby (Sotby Wood) (Proposed site exit):

F2. Zoomed View (Red circle is the Permissive footpath bridge. Red square is Greenacres (Sotby) (which is Viewpoint A)

F3. Zoomed View (Looking West towards Hatton from Proposed Exit)- Red square Yew Trees (Hatton):

G1. From Footbridge on Permissive Path, looking South towards Corner Farm (highlighted with red box)

Standard View – open countryside.

G2. Looking North from the Permissive footpath bridge towards Wass Lane (Sotby wood on the left)
Standard View – open countryside

G3. Open view across field, having stepped over footbridge, looking South towards Corner Farm

G4. From the permissive footpath with Sotby Wood behind, looking due West along permissive path towards Hatton (Square-Glebe farm, Triangle Sibthorpe & Circle-Old Barn)

H1. South of Sotby Wood with the woods on the left and looking south-east across the development site towards Corner Farm (red square)
Standard View

H2. Zoomed view

I: From PRoW in Hatton (Kissing gate) with Yew Trees behind, looking towards Corner Farm (Proposed development is Red box)

I2. Zoomed view:

All pictures taken from a Samsung S21 FE 5G (August 2025)