

Aldington: East Stour Solar Farm

SEI Chapter 11 Landscape and Visual Impact - Written Statement and Appendices (January 2024)

Introduction

In December 2022 Land Management Services Ltd (LMS) prepared a report for Ashford Borough Council on the Landscape and Visual Impact Assessment (LVIA) submitted as part of the planning application by EDF for the East Stour Solar Farm. The report was informed by a desk top review of the Environmental Statement (principally Chapter 11), three meetings with ABC planning case officers and a site visit undertaken on 17th November 2022. The report was not a comprehensive LVIA review but was prepared as an initial note to highlight what were considered to be key concerns relating to ES Chapter 11 addressing Landscape and Visual Impact.

In January 2024 EDF submitted Supplementary Environmental Information (SEI) including a Written Statement and updated Figures and Visualisations, and a response to the comments made by LMS in December 2022.

This further report by LMS offers comments on the January 2024 SEI and has been informed by a desk top review of the SEI documents.

LVIA Methodology

The LMS December 2022 report concluded that the LVIA methodology set out in the April 2022 ES Appendix 11.2 was *inadequate and lacks any definitions or criteria used to inform judgements on landscape and visual sensitivity, value, susceptibility to change, magnitude of change and assessment of effects* and that *the lack of methodology makes it very difficult for ABC as decision maker to understand how the respective conclusions have been reached and whether they provide a reasonable assessment of the anticipated impacts and effects of the scheme.*

The January 2024 SEI includes a revised Methodology (Appendix 11.1 LVIA/CLVIA Method of Assessment). This report considers that the updated Methodology offers a more comprehensive and detailed explanation which is more consistent with best practice guidance, principally that set out in GLVIA3 and Technical Guidance notes issued by the Landscape Institute.

Appendix 11.1 describes the guidance used to prepare the Methodology, the nature of sources which inform the LVIA/CLVIA and identification of receptors, describes the process for evaluating the value, susceptibility and sensitivity of receptors and includes matrices to clarify how judgements have been reached. Similarly, there is a clear explanation and matrices to describe the process of evaluating effects of the proposals, including an explanation and matrices for assessment of the magnitude of change and overall assessment of landscape and visual effects.

Further detail on the approach to CLVIA is included in the SEI Chapter 11 Written Statement.

The SEI includes a rebuttal to the comments made in the LMS December report. Comments on the rebuttal and other points are set out below.

LVIA Layout and Approach

While the inclusion of a more detailed Methodology is helpful in understanding the overall approach and the basis for judgements and conclusions, many of the concerns from our initial review of the LVIA Chapter in December 2022 with regard to the layout remain, which in our view makes the assessment process difficult to follow.

Site Layout and Design

The LMS report of December 2022 found that *there is little or no evidence in the ES Chapter as to how the LVIA has informed the current locations, proposed layout of the solar panels and any mitigation.*

Section 1 of the SEI Chapter 11 includes a discussion of Solar Farm Design Progression. This section responds to questions posed during a meeting with ABC in June 2023. The SEI sets out the background to the selection of the application site and the considerations given to the suitability of the initial available landholding. The identified constraints on areas of the landholding are set out and include landscape and visual factors and an explanation of how these influenced the final layout. The SEI also references residential views and comments and how these were addressed to achieve the final layout. The SEI does therefore offer a greater level of understanding of how landscape and visual factors informed the final layout. It is important, however, to note that the January 2024 SEI does not appear to propose any change to the quantum and extents of solar panels from the April 2022 EIA and therefore many of the concerns from our December 2022 review and comments raised by others (ABC Recreation Services and Church Lane Group) would remain.

Section 2 of SEI Chapter 11 discusses the Mitigation Rationale. The SEI includes a revised and annotated Figure 11.9 Rev A Mitigation Plan, which includes additional native hedgerow planting or existing hedgerow enhancement at selected locations, and a series of cross sections representing the landscape proposals associated with Public Rights of Way within the application site. The locations are shown on Figure 11.14 Cross Section Locations. These additional plans are helpful in understanding the anticipated impacts and effects of the proposals on the PRoWs and the experience for PRoW users.

Landscape Character Assessment

The LMS December 2022 report commented that *the chapter does seek to distinguish between landscape and visual matters but these are frequently confused or combined in the document and concluded also that illustrative material and plans are also inadequate, in particular with regard to site topography, key landscape features and analysis (woodlands, hedges, etc) and clear identification of the locations of properties described in the LVIA.*

The SEI responds that the use of viewpoint locations *to assess effects of the proposals on landscape character provides an additional layer of information and robustness to the assessment* (para 11.34). While it is acknowledged that a visual representation of landscape may be helpful in illustrating landscape features or qualities within a landscape character context, assessment of landscape effects would normally consider visibility of the receptors

as only one of a number of factors. As stated in the previous LMS report, the LVIA, while quoting extensively from published Landscape Character Assessments, *provides only limited analysis of the degree to which the land affected by the proposals reflects the key characteristics of the various landscape character areas within the published assessments. There is very limited description of the landscape characteristics of the Site.* The SEI provides limited further supporting baseline assessment information in this context and in the absence of a detailed analysis of the baseline conditions and representativeness of the site itself in a landscape character context it remains difficult to understanding the assessment of effects.

While the more detailed Methodology supplied in Appendix 11.1 is helpful in setting out the parameters for assessment, the LVIA Chapter as submitted in the original planning application is not fully consistent with the Methodology. Of particular note is the consideration of “Landscape fabric”, defined in the Methodology as the “landscape features and elements on the site”. As mentioned above, there appears to be no real baseline assessment of landscape elements (or of landscape qualities) reflected by the site itself which would inform an assessment of sensitivity. The assessment of effects on landscape fabric (Chapter 11, para 11.28) appears to be limited to a short paragraph which is considered to be too generalised and insufficient as an analysis of effects on the landscape features and qualities of the site itself.

The SEI provides no further illustrative material with regard to *site topography, key landscape features and analysis (woodlands, hedges, etc) and clear identification of the locations of properties described in the LVIA.* The concerns expressed in the LMS report therefore remain.

Visual Assessment

The LMS December 2022 report commented that the *inclusion of only 12 representative viewpoints (of which 4 are longer distance views from the AONB) is inadequate for an impact assessment of this scale.* It was considered also that single viewpoints from key receptors such as PRoW AE457 and Church Lane, were insufficient to be representative of the impact of the scheme on these receptors. The LMS report also commented on the absence of viewpoints from a number of locations to the north, south, east and west which the ZTV suggests may have views of the site, and inadequate coverage of potential views from visual receptors including local PRoW, roads and properties. It is noted here also that the LVIA still does not include any viewpoints from PRoW AE459, although the route would traverse the proposed area of solar panels east of Church Lane which is currently open farmland. The inclusion of illustrative cross sections along PRoW AE459 is helpful in this respect, but does not inform an assessment as to the anticipated visual impacts and effects to footpath users, which we consider should be included. LMS also commented on the absence of winter photography, which would normally be used to depict “worst case scenario” in a visual context while trees are not in leaf.

Assessment of visual effects would also benefit from review within the context of the Methodology in SEI Appendix 11.1. For example, on the basis of the visualisation for Viewpoint 2 (as shown in Appendix 11.2 of the submitted LVIA), magnitude of change is assessed as “None”, with consequent “no effects on visual amenity”. However, the view would change substantially from the existing view of open farmland to one of relatively young

woodland. While this may be considered to be beneficial in comparison with the predicted change to the view at completion, it nevertheless represents a substantial change to the baseline view, and the magnitude cannot be assessed as “None”. As an additional comment, it is also considered that the Year 10 visual representation suggests a greater level of development and maturity of the mitigation planting than would actually be the case, especially in winter.

The SEI offers a further viewpoint (viewpoint 13) at the request of the Kent Downs AONB and identifies an additional series of viewpoints (A-E) to support the CLVIA. The SEI offers no additional LVIA viewpoints representing key receptors as identified above, and the limited number of LVIA representative viewpoints therefore remains a concern.

The SEI relies on comments within the narrative to give due consideration to winter views. It is unfortunate that winter views have not been provided as there has been ample time to prepare winter views since the initial comments were made in December 2022. The lack of evidence in the form of winter photography, which might be expected for a proposal of this scale and nature, is unhelpful and makes it difficult for ABC to understand visual effects of the proposals in a winter context.

LMS commented on apparent inconsistencies between the photomontages and assessment of effects, specifically that *in some cases Major/Moderate or significant adverse effects are identified even after 10 years eg Viewpoint 3, whilst in others the assessment concludes that effects will reduce by Year 10, which are not backed up by the photomontages which show very limited change to the view eg Viewpoints 6 and 7*. The SEI response gives the reasons for the assessment of effects on Viewpoint 7 and suggests, broadly speaking, that effects are assessed on a continuum and are a question of professional judgement. While this is understood, it would be helpful to have further detail on assessment of residual effects where the photomontages do not appear to support a long term diminution compared with effects at completion.

The SEI includes enhanced mitigation proposals at Figure 11.9. There is, however, no indication in the SEI that this would reduce the anticipated impacts and effects described in the April 2022 EIA.

Cumulative Impacts

The LMS 2022 report sought a more comprehensive assessment of cumulative impacts, especially within the context of the nearby Stone Street¹ solar scheme to the west.

The SEI includes a CLVIA covering the Stone Street scheme and other solar schemes which were not formal applications at the time of the submission of the East Stour Solar Farm application and the proposed Otterpool Park Garden Town. The Written Statement includes additional details of the assessment methodology appropriate to CLVIA to supplement Appendix 11.1. The CLVIA is supported by five new viewpoints and by Figures 11.25 and 11.26 which illustrate the CZTVs of the scheme in conjunction with the other identified schemes.

¹ Incorrectly referenced as East Stour in the LMS December 2022 report

The CLVIA acknowledges that viewpoints A-E were taken during summer months and do not reflect winter views in terms of screening from vegetation in the local landscape. Again, it would be helpful to include winter photography and an assessment of visual effects based on winter conditions.

As with the LVIA, assessment of cumulative effects on landscape receptors uses viewpoints for purposes of assessment, which is considered to combine visual and landscape effects to some degree and lacks clarity in terms of effects on landscape receptors. For example, Table 11.2 does acknowledge Major/Moderate Adverse effects on local landscape character areas associated with Viewpoint 7, but the assessment narrative focuses largely on the anticipated combined visibility of the identified development schemes. The discussion of cumulative effects on identified landscape receptors does however offer a more detailed analysis drawing on identified baseline characteristics of eg local landscape character areas.

Conclusions

The provision of a more detailed Methodology is in accordance with industry guidance and normal best practice. The discussion of Design Progression in Section 1 is helpful in understanding the landscape and visual factors influencing choice of site location and layout. The additional Figures (cross sections) are useful in understanding the proposals in relation to impacts on ProWs (but see below regarding lack of representative views). The CLVIA offers a helpful and detailed assessment of landscape and visual effects in conjunction with other identified development schemes.

However, principal areas of concern which remain include:

- the assessment process as set out in the LVIA Chapter remains difficult to follow;
- the evidence base remains inadequate, in particular the lack of representative views and identification of visual receptors (in particular PROWs);
- the SEI provides no further illustrative material with regard to site topography, key landscape features and analysis (woodlands, hedges, etc) and clear identification of the locations of properties described in the LVIA.
- there remains a very limited description of the landscape characteristics of the Site and detailed analysis of the site baseline conditions and representativeness in a landscape character context;
- LVIA assessment does not clearly distinguish between landscape resource and visual amenity.

Overall the SEI, while addressing some of the points raised in the LMS December 2022 report, does not answer previously expressed concerns with regard to the evidence base, layout of the LVIA Chapter and distinctions between landscape resource and visual amenity, and, in our opinion, it therefore remains difficult for ABC to rely on the findings and conclusions of the LVIA in providing a reasonable and representative assessment of the anticipated impacts and effects of the proposals.

Land Management Services Ltd
23rd February 2024