

Response to Wynne -Williams Review of the submitted Tydd Solar Farm LVA

1. INTRODUCTION

- 1.1 This document has been prepared as a response to the review undertaken by Louise Dolan, of Wynne- Williams Associates in March 2025 ('the review') on behalf of Fenland District Council, of the submitted Tydd Solar Farm Landscape and Visual Appraisal (LVA).
- 1.2 It is noted that the review in paragraph 2.1 acknowledges that the methodology used within the submitted LVA 'is broadly in accordance with the relevant guidance given in GLIVA3 and, under paragraph 2.4, the *'criteria for reaching judgements are generally clear for both landscape and visual effects'*.

2. LANDSCAPE CHARACTER

- 2.1 The review is content that in the absence of a District level landscape character assessment, the national/regional NCA 46 The Fens published assessment has been used in the LVA. The review is also happy, in paragraph 3.4 that the LVA's author has prepared their own assessment of character. In respect of the latter, the review states the author's own assessment of character *'is proportionate for the purposes of the LVA, we are in agreement with the descriptions from our observations in the field'*.
- 2.2 However, in paragraph 3.17 the review states that *'distinct and separate landscape receptors should be identified in line with GLIVA3'*. And, in paragraph 3.18, goes on to say that, *'a more detailed consideration of landscape receptors would have highlighted the considerable effects that will be felt on the site itself as a landscape receptor'*.
- 2.3 The GLIVA3 glossary defines Landscape receptors as *'defined aspect of the landscape resource that have the potential to be affected by the proposal'*. GLVIA3

does not give a list of landscape receptors to be assessed. Likewise, the review, other than public rights of way internal to the site, is not specific about what landscape receptors the LVA might have more fully assessed.

- 2.4 Notwithstanding the review's vagueness, The Landscape Institute's 'Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3)' – Technical Guidance Note LITGN-2024-01, published August 2024, states in paragraph 5(2) that '*Landscape features, elements and characteristics that could be subject to change must be clearly described in their own right and could be treated as receptors if appropriate*'. In this respect the review recognises, in paragraph 3.10, the fact that the submitted LVA has assessed the effect on landscape elements including '*topography, arable land, public rights of way, woodland and hedgerow and water features*'. As the submitted LVA explains the landscape elements and features are site specific ones and ones that characterise the site's landscape. Each element and feature is assessed separately as suggested in the review. As the review acknowledges in paragraph 3.11, '*for most elements the assessment is fine and in line with the methodology*'.
- 2.5 The submitted LVA in paragraph 7.16 acknowledges that 'there would be a notable change to the character of the site' with the proposed development in place. The current agricultural uses on the site would be removed and new solar energy generating and storage uses and structures would be introduced.
- 2.6 However, paragraph 7.16 goes on to explain that, '*the proposed development would also retain the site's existing landscape features of woodland copse, and drainage channels together with a flat topography. The retained landscape features will continue to contribute to both the character of the site and the wider landscape during the operational phase of the proposed development*'.
- 2.7 Section 6 of the submitted LVA assesses the effect of the proposed development on the site's existing landscape features and elements. This section of the LVA outlines

that, apart from the current arable nature of the fields which would alter, the proposed development would provide enhancements to the existing woodland and hedgerow resource together with the water features of the site through the respective implementation of new tree and hedgerow planting and the creation of reed beds.

The grassland beneath the proposed solar panels would also have the potential to be managed for ecology and increased biodiversity. The review does not dispute the findings or proposition in respect of the site's existing elements and features (see paragraph 2.4 above).

- 2.8 The review's author makes a judgement (at paragraph 3.19) that the effect on the character of the landscape, expressly within the site, would be '*major adverse*'. However, it is not clear whether this judgement is in respect of year 1 of the operational phase or regarded as a residual scale of effect for the duration of the proposed development's operational phase. Either way, the reviewer's judgement does not appear to take it account the undisputed enhancements to the landscape elements and features that characterise the site, which would accompany the proposed development. The submitted LVA judges the scale of effect on the character of the local landscape as a whole to be moderate adverse at year 1 of the operational phase and minor adverse at year 10 taking into account the specific enhancements to the site's woodland and tree resource.

3. VISUAL AMENITY

- 3.1 The review is especially concerned about the visual effects of the proposed development. In particular the review focuses on the effect of the proposed development on those public rights of way that pass through the site. The submitted LVA acknowledges in paragraph 3.40, that those public rights of way passing through the site '*afford views across large parts of the site*'.
- 3.2 As clearly stated, the representative views within the submitted LVA are not intended to be exhaustive. This is in accordance with best practice. GLIVA3 does not

prescribe the number of representative viewpoints that a particular scheme requires. Similarly it is not a requirement of an LVA to include a photomontage for every representative view. Those included in the submitted LVA were intended to supplement an understanding of the anticipated visual effects of the proposed development.

- 3.3 It is not clear why the review particularly highlights the absence of an LVA viewpoint from Harold's Bridge? The visual assessment in the LVA uses a similar representative view from Goredike Bank approximately 500 metres to the north of Harold's Bridge.
- 3.4 The review mentions that Viewpoint 5 in the LVA could have been assessed as a public right of way. Technically this observation is correct. However, the public right of way is a short one (approximately 260 metres in length) and leads to a dead end at a drainage ditch. The exact location of the viewpoint, from the public highway, was judged to be more representative of the likely visual receptors, i.e. people using the highway, experiencing the view.
- 3.5 In respect of view point 6, the review mentions that the viewpoint could also represent occupiers of residential property and as such would have a higher sensitivity than that of a public highway used in the LVA. Residential Visual Amenity Studies are not normally asked for other than as part of an EIS project. The Tydd Solar farm was screened as not to require an EIA. Notwithstanding this, the speculation in the context of this point was that the adjacent properties were predominantly single storey and apparently enclosed by tall fences. Though the sensitivity of the visual receptor i.e. occupiers of the residential property might have been higher, in this instance the magnitude of change experienced would have been lower, as the view of the proposals would have been greatly restricted. As such the scale of effect would have been lower than assessed.

- 3.6 The review also mentions that Viewpoints 1, 7 and 8 might also be considered as representing public rights of way rather than only as public highway. Were this to be the case, the sensitivity of each of the visual receptors would increase to high, as users of the public right of way network are deemed to have a greater sensitivity to change than users of the public highway. Taking the visual receptor as representing a user of the public right of way would mean that the scale of effect would correspondingly increase at year 1 of the operation phase. However, as per the submitted LVA the scale of effect would still decrease at year 10 of the operational phase for the reasons given in the submitted LVA.
- 3.7 It is important to note that where the review and the submitted LVA differ in the level of the scale of effect in respect of a particular viewpoint, this represents a difference of professional judgement. Not an inaccuracy of the submitted LVA.
- 3.8 The review is correct to say that viewpoints from the public rights of way were not included in the representative viewpoints. The review is also correct to state that the total length of right of way passing through or adjacent to the site is approximately 2 miles (3.5km).
- 3.9 However, being precise, only approximately 0.6 miles (1km) would actually pass through the proposed development. The remaining length of right of way would pass along the edge of the proposed development.
- 3.10 Views are typically experienced 'in the round' i.e. 360 degrees. For users of the public right of way on the edge of the proposed development, their visual amenity would still include views of approximately 180 degrees of 'undeveloped' landscape looking away from the site. There would still be a ready perception of an intensively farmed agricultural landscape that currently exists.
- 3.11 It is accepted that along the section of right of way 13/283/17 that passes along the existing access track that would bisect the proposed development, the high sensitivity of the users, combined with a high magnitude of change with the

proposals in place, would give rise to a major adverse scale of effect along much of the 1km length of route at year 1 of the operational phase.

- 3.12 However, the presence of the retained woodland block on the site would form some screening from some sections of the access track so that not all the proposed development would be seen. Similarly, the flat topography would mean that those solar panels closest to the right of way would effectively screen solar panel's further away. New areas of mitigation planting on site would further reduce the visual effect of the proposals for users of the public right of ways passing through and adjacent to the site boundary.
- 3.13 The level of mitigation, in the form of new tree and hedgerow planting, currently proposed and identified in the submitted LVA is the result of considered assessment, deliberation, and design as advocate in GLVIA3. Continuous and extensive lengths of hedgerow and large woodland blocks are not a conspicuous feature of the host landscape containing the site. The present mitigation measures propose new tree and hedgerow planting at key points internally and along the boundary of the site. The present proposed mitigation is considered to reflect and be sympathetic to the existing pattern of the site and wider local landscape.
- 3.14 The review in paragraph 3.27 advocates increasing the level of new hedgerow planting, specifically to the south and west [boundaries?] of the site. The review also alludes to increasing the level of tree/hedgerow planting internally to the site along the public right of way/access track. Were this approach supported by Fenland District Council, a suitably worded condition could be applied to any planning consent.