

Tydd Solar Farm

Landscape Statement of Case of Ruth Knight

October 2025

Landscape and Visual Matters
on behalf of Pathfinder Clean Energy

Fenland District Council Ref. F/YR24/0457/F

South Holland District Council Ref. H19-0329-24



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Role	Who	Date
Author	Ruth Knight	23/09/25
Reviewer	Mary Fisher	23/09/25
Finalised	Ruth Knight	24/10/25

1 Introduction

- 1.1.1 This statement has been prepared by Ruth Knight, a Technical Director of Abseline LLP landscape planning consultants. I hold a Bachelor of Arts Honours Degree in Landscape Design and Town Planning, a Diploma in Landscape Architecture and a Master of Arts Degree in Planning Policy and Practice. I am a Chartered Member of the Landscape Institute and have over 24 years of experience as a landscape architect.
- 1.1.2 I have undertaken LVIA's for a variety of forms of development, including hospitals, renewable energy developments, housing, business parks/industrial estates and football stadia. My work also involves site appraisals; landscape, townscape, seascape and visual assessment; consultation; environmental impact assessments (EIAs); landscape and urban design; the implementation of landscape schemes; and advising on management and maintenance schemes. Recent key projects have included the LVIA's and landscape design for Associated Developments for Sizewell C Power Station, including providing written responses to Examining Authority questions and supporting at hearing session, preparing written statements on landscape, visual and Green Belt matters for a residential scheme in Cambridgeshire and preparing proofs of evidence for a hospital development in Jersey and residential developments in Essex.
- 1.1.3 I have experience of assessment for solar farms at scales varying from the 5MW Fiskerton Solar Farm in West Lindsey to a DCO NSIP project in Buckinghamshire.
- 1.1.4 I have appeared in order to give expert witness evidence on landscape and visual matters at a public inquiry for a proposed hospital, and attended DCO and appeal Hearings, in addition to preparing evidence for written representations appeals.

1.2 Appointment

- 1.2.1 I am instructed to present evidence to this Appeal on behalf of Pathfinder Clean Energy UKDev Ltd (the Appellant) in respect of landscape and visual matters. My first involvement with the Proposed Development was in August 2025, when I was approached to review the case and act as expert witness in relation to landscape and visual matters.
- 1.2.2 I believe that the facts stated in this evidence are true and that the opinions expressed are correct. This evidence and the accompanying report have been prepared and are given in accordance with the guidance of my professional institution, the Landscape Institute.
- 1.2.3 In preparing my evidence I have had the benefit of seeing draft Statements of Case prepared by the other witnesses acting for the Appellant.

2 Context and Scope of Evidence

2.1 Context of the Appeal

- 2.1.1 The background and context to this appeal are set out in the main Statements of Case (one covering a Section 78 appeal in relation to the area of the appeal site within Fenland District Council (FDC) and a separate one covering the area in South Holland District Council (SHDC)).

2.2 Reasons for Refusal

- 2.2.1 The reasons stated in the decision by FDC to refuse the application (Application Ref. F/YR24/0457/F) include:
"2. The proposed development would result in a large alien feature within the Countryside. The proposed development would have a significant adverse impact on the intrinsic character and beauty of the countryside in this location and the wider area, contrary to policies LP14 and LP16 of the Fenland Local Plan 2014 and paragraphs 166(a) and 187(b) of the National Planning Policy Framework. Whilst the benefits of renewable energy and the contribution that the proposed development would make towards addressing climate change are noted, it is not considered that these outweigh the significant harm to the character and appearance of the area." [my underlining]
- 2.2.2 The second reason for refusal by FDC and the reason for refusal by SHDC (Application Ref. H19-0329-24) relate to Best and Most Versatile Agricultural Land, which are addressed in evidence provided by Tony Kernon. The underlining above draws out the landscape and visual aspects of the reason for refusal which relate to the effects on landscape character.
- 2.2.3 The remainder of this proof is structured as follows:
- Section 3 summarises the landscape and visual effects identified within the landscape and visual appraisal (LVA) submitted with the planning applications and my consideration of the proposals;
 - Section 4 sets out my conclusions.

2.3 Committee and Delegated Reports

Fenland District Council

- 2.3.1 The FDC Committee Report in relation to the Proposed Development recommended approval. It is undated but was uploaded to FDC's Public Access portal on 6 May 2025. A subsequent update was uploaded on 13 May 2025, in advance of the FDC Planning Committee date of 14 May 2025, which acknowledged that SHDC had refused application H19-0329-24 but did not update anything in the original report in relation to landscape and visual matters. Much of the text in the Committee Report is baseline description or reporting of the LVIA findings. Key points pertinent to this case noted in relation to landscape and visual matters are considered below.
- 2.3.2 In the Executive Summary at paragraphs 1.3-1.4, the Committee Report states:
*"The proposed development would not result in any significant harm in respect of residential amenity, ...
 The proposed development would result in harm to the character and appearance of the area and BMV land being taken out of arable production. It is considered that these factors attract moderate weight against the application in the overall planning balance."*
- 2.3.3 Section 10 of the FDC Committee Report provides the assessment of the Proposed Development against planning policy. It states at paragraph 10.35 that:
"The LVA provides a robust rationale for how the landscape and visual impacts have been mitigated through site selection, layout and design."
- 2.3.4 At paragraph 10.42, the FDC Committee Report references an independent review of the Applicants' LVA, referring to broad accordance with relevant guidance, but discrepancies and omissions in relation to

landscape and visual impacts and locations and extent of proposed soft landscaping. I provide comment on the LVA Review below.

2.3.5 At paragraph 10.43, the FDC Committee Report states:

“Due to the existing landscape value and flat topography of the site and surrounding area, and the provision of soft landscaping to aid assimilation of the proposed development into the surrounding area, it is considered that the proposed development would not have any significant landscape effects on the surrounding area. However, due the magnitude of change of the existing flat, open appearance of site and its high prominence from nearby public vantage points, the proposed development would cause harm to the open character and appearance of the countryside, contrary to policy LP16 of the Fenland Local Plan 2014.”

2.3.6 Paragraphs 10.44 to 10.51 of the FDC Committee Report relate to residential amenity. These focus on noise and disturbance, predominantly during construction, and potential for glint and glare impacts. Residential visual amenity was not identified as a main potential residential amenity impact. This section of the FDC Committee Report concludes:

“It is therefore considered that the proposed development would not have any significant adverse impacts on the residential amenity of neighbouring properties, in accordance with policy LP16 of the Local Plan.”

LVA Review by Wynne-Williams Associates

2.3.7 FDC commissioned an independent review of the LVA by Wynne-Williams Associates (the Wynne-Williams review), dated March 2025. A response to the Wynne-Williams review was submitted to FDC, dated May 2025. The main points of agreement with the LVA made in the Wynne-Williams review can be summarised as follows:

- The LVA methodology is broadly in accordance with the relevant guidance, GLVIA3 (the Guidelines for Landscape and Visual Impact Assessment, 3rd Edition).
- Criteria for reaching judgements are generally clear for both landscape and visual effects.
- The report assesses the necessary study area extent.
- The LVA includes relevant references from the National Character Area Profile.
- The LVA notes the lack of District-level Landscape Character Assessment, and for this reason the author carries out their own assessment of character. This is a brief review which is proportionate for the purposes of the LVA, and the Wynne-Williams review is in agreement with the descriptions.
- The geographical extent of the proposed solar farm would have only a limited effect on character at this scale.
- The commentary on predicted landscape effects in the wider landscape are not disputed. Key changes are noted about landscape features within narrative text.

2.3.8 I consider the following points raised in the Wynne-Williams review in greater detail in Section 3 below:

- The effects on landscape character are judged by a single summation of value and sensitivity of the local landscape. This differs from best practice guidance in GLVIA, where individual landscape receptors should be identified and effects assessed for each of receptor.
- The effects on visual amenity are judged by reference to 8 viewpoints. The Wynne-Williams review believes this assessment omits some important visual receptors which are therefore not identified within the LVA.
- In relation to effects on landscape elements and features, the Wynne-Williams review states that: *“under Public Rights of Ways it is not clear whether it is only considering the physical footpath itself, or also its amenity.”*
- A judgement of medium value is given (in relation to landscape character). It would be beneficial for this section to have some narrative text summarising where the site gains its value and therefore an understanding of what may harm landscape value of the site.

- The LVA does not separate out receptors and instead makes these judgements based on the local landscape generally. The Wynne-Williams review considers that a more detailed consideration of landscape receptors would have highlighted the considerable effects that will be felt to the site itself as a landscape receptor. The Wynne-Williams review considers that major adverse character effects would be felt to this receptor.
- The Wynne-Williams review states:
"In the section summary (7.31) the report states "Any perceived changes in the character and appearance of the local landscape would be limited". Given the extent of PRow within the site, we do not agree with this statement as there is ample opportunity to perceive a dramatic change in character at close range."
- Although residents at home and those using the PRow are identified in the baseline, neither of these high sensitivity receptors are considered in the visual assessment.
- Viewpoints within the site are not considered, despite there being approximately 2 miles of PRow within the site boundary.
- There are views from the PRow at Harolds Bridge in the wider landscape that are not considered in the visual assessment.
- In relation to mitigation planting, the Wynne-Williams review states:
"Mitigation planting is welcomed; however this is not to all site boundaries leaving views to the solar farm from the west and the south particularly open. Perhaps this is intentional so as not to introduce too many hedges into the landscape as a new permanent element, when the solar farm itself is not permanent. Whatever the reasoning it is not clear within the narrative text, and we consider that more screening of the solar farm from the south and west would be welcome. Visualisations at years 1 and 10 are given for some of the viewpoints but not all. The rationale behind this is not explained in the report."
- The Wynne-Williams review considers that the effectiveness of mitigation planting may be overstated, as there is no boundary planting proposed to much of the site boundary.
- The Wynne-Williams review considers that the distance that solar panels are offset from the Site boundary and the locations of proposed hedgerow planting is not clear.

South Holland District Council

- 2.3.9 The SHDC application was determined via a delegated decision. The delegated officer report sets out the main considerations in relation to the determination of the application. Electronic pages 16-17 of the SHDC delegated officer report consider 'Landscape character and visual impact'. Much of the text quotes policy or the LVA. Key points pertinent to this case noted in relation to landscape and visual matters are considered below.
- 2.3.10 The first full paragraph on electronic page 17 of the SHDC delegated officer report acknowledges that the distance covered by the Zone of Theoretical Visibility (ZTV) is appropriate for the scale of the Proposed Development and the topography.
- 2.3.11 The last four paragraphs of this section set out concerns that officer report identifies in relation to landscape and visual matters, as follows:
"Given the scale of this proposal, naturally there would be a fundamental change to the visual amenity of the area. The cumulative landscape impacts then would change the fabric of the existing landscape character, the solar farm would heavily industrialise the landscape fabric, due to its scale. Those using the PRow would also have their visual amenity impeded. Though a strategy to retain the through-way would still retain its accessibility. The fencing would also have an effect along with the planting, and whilst hedging is being used the abundance of the planting, as well as the heights that the screening is required would be out of keeping with the existing Fenland landscape. It is unlikely that once decommissioning stage occurs that the landscape will

be truly returned to its existing condition, some evidence of the development is likely to remain, the landscaping will remain engineered and abundant and in so this development will have a lasting effect upon this part of the open countryside, resulting in an incongruous development within this rural setting.

In these terms the proposal is considered not to accord with SELLP Policy 31b or NPPF paragraph 187. This is not to suggest that the landscaping scheme is inappropriate, the impact simply reflects the natural conflict between open countryside and major essential infrastructure development, located in an open landscape. Any permission would be subject to condition requiring the landscaping scheme to be completed at the first planting season so the residual stage is reached in the quickest possible timeframe."

- 2.3.12 Similar to the FDC Committee Report, the SHDC delegated officer report includes a section on residential amenity. These focus on noise and disturbance, predominantly during construction, construction parking and keeping the road network clear, and potential for glint and glare impacts. Residential visual amenity was not identified as a main potential residential amenity impact. This section of the SHDC delegated officer report concludes:

"In terms of residential amenity, the proposal is considered to be mitigated to an acceptable level, when weighed against climate change benefits and so accord with NPPF Paragraph 135 as well as SELLP Policies 2 and 3 and Planning Practice Guidance on glint and glare".

- 2.3.13 The Planning Balance section of the SHDC delegated officer report concludes:

"The impact upon the landscape character and the amenity of nearby residents are likely to result in the proposal being partly contrary to policies 2, 3 and 31 of the South East Lincolnshire Local Plan.

Notwithstanding the impacts upon amenity and Character landscape, the UK governments as well as the combined South & East Lincolnshire Council Partnership targets to reach net zero by 2050 are material matter. It is likely that this urgency would weigh in favour of the proposed development, when considering the impact upon the landscape".

2.4 Consultation Responses

Fenland District Council

- 2.4.1 Having undertaken a review of consultation responses in relation to the FDC planning application, the following relate to landscape and visual matters.

Tydd St Giles Parish Council

- 2.4.2 An initial response from Tydd St Giles Parish Council, dated 28 June 2024, indicated a number of points of objection. These included:

"The Elloe Bank bridleway forms a key section of an important rural equestrian network to the west of the Parish. ...what measures will be included to ensure that it retains its rural appearance in perpetuity after the completion of the development?"

- 2.4.3 This refers to the Public Bridleway (Path Number 13: Tydd St Giles), which runs north to south through the centre of the Site, along Elloe Bank. The Applicant provided a response to the Tydd St Giles Parish Council objection, dated 13 November 2024. It included the following response on PRoW:

"... measures to protect the users of the Bridleway include provision of a 4m minimum width for the path as well as a minimum 4m buffer between the bridleway and the deer fence that separates the path from the solar fields as requested by the definitive map team. Further, strategic planting of additional hedges, trees, and underbrush habitat will prevent long-range views of the site while maintaining the rural Fenland character of the area."

- 2.4.4 A subsequent response from Tydd St Giles Parish Council, dated 16 December 2024, acknowledges the response from the Applicant and withdraws the original objection.

British Horse Society

- 2.4.5 The British Horse Society (BHS) provided an initial response in relation to the FDC planning application, dated 10 June 2024. It stated:

"I can find no information within the documents to explain how the amenity and enjoyment of these PROWs are to be protected and maintained other than a statement along the lines of 'the PROW's will be available once the construction work is completed'. There are also some vague references about application for TRO's to close the PROWs. That is simply not acceptable. Access to PROWs must be available at all times and their amenity for all users must be protected.

On the basis of this lack of information, I OBJECT to this planning application until satisfactory and detailed data has been received."

- 2.4.6 A further, more detailed response to the FDC planning application was submitted, dated 28 August 2024. The landscape and visual points raised in this response include:

- How long before the screening grows sufficiently to be useful?
- BHS advice on bridleways being fenced that haven't previously been fenced indicates that a 'used width' of 4m should be provided.

- 2.4.7 The Applicant provided a response to the BHS objection, dated 16 September 2025. It included the following responses:

- In order to create immediate visual mitigation, mature tree, hedge, and understorey planting will be included in the areas of new planting and will be part of the development from the outset.
- A bridleway width of 4m and additional buffer of 4m on either side of the bridleway will be adhered to through the length of the bridleway. This buffer meets the Lincolnshire and Cambridgeshire requirements for this type of public right of way and is considered acceptable by the definitive map team as well.

- 2.4.8 A further response from the BHS, dated 9 October 2024, indicates that they do not consider that the response from the Applicant responds to their request to improve the PRoW network as per the Rights of Way Improvement Plan, but makes no further comment in relation to visual mitigation.

Other Parties

- 2.4.9 The FDC Committee Report summarises the representations received from local residents and/or interested parties. This quotes 36 representations, with the main objections of relevance to landscape and visual matters being:

- Inappropriate location.
- Inappropriate scale.
- Impacts on character, appearance and tranquillity of the countryside / landscape.
- Recreational impacts (of which only visual effects for users of the PRoW would be relevant in landscape and visual terms).
- Outlook impacts / loss of views.

South Holland District Council

- 2.4.10 Having reviewed the consultation responses made available to the Applicant and the summaries provided in the SHDC delegated officer report, the following issues were raised that relate to landscape and visual matters.

Sutton St James Parish Council

- 2.4.11 Sutton St James Parish Council object on the following reasons relevant to landscape and visual matters:
- Public Footpaths and bridleways of which only visual effects for users of the PRoW would be relevant in landscape and visual terms).

- Visual Impact.

Tydd St Giles Parish Council

- 2.4.12 The submission made by Tydd St Giles Parish Council replicates that provided in relation to the FDC application, as discussed above.

Other Representations

- 2.4.13 The SHDC delegated officer report sets out objections received by ward members, with those relevant to landscape and visual matters as follows:
- Planting / Screening & Landscape Impact - Although there are multiple references to screening around the site with tree planting & shrub understory, it doesn't elaborate on the maturity of the trees and shrubs. It implies that the planting would not be substantial as the applicant responded to feedback from a resident that *"the planting, when mature, would effectively screen the site"*.
 - Huge impact on the appearance of Fenland's characteristic open farmland.
- 2.4.14 The SHDC delegated officer report also summarises the representations received from local residents, with the main objections of relevance to landscape and visual matters being:
- Impingement for walkers and cyclists (of which only visual effects for users of the PRow would be relevant in landscape and visual terms).
 - Impact on bridleways and horses (of which only visual effects for users of the bridleways would be relevant in landscape and visual terms).
 - Character & Landscape Impacts.

2.5 Relevant Planning Policy

- 2.5.1 Relevant planning policies in relation to landscape and visual effects are set out for context in the submitted LVA.
- 2.5.2 In relation to the application of planning policy to the landscape and visual evidence I provide, planning evidence is separately provided as part of this appeal by Robert Shaw.

3 Landscape and Visual Effects

3.1 Introduction

- 3.1.1 A full appraisal of landscape and visual effects (the LVA) was submitted with the planning applications. This LVA was prepared by Briarwood Landscape Architecture in October 2022. It was supported by the following figures:
- Site Location Plan at Appendix 1;
 - Landscape Features Plan at Appendix 4;
 - A plan of Designations at Appendix 5;
 - A Screened Zone of Theoretical Visibility at Appendix 7;
 - The Proposed Site Layout at Appendix 9; and
 - The Mitigation and Enhancement Plan at Appendix 10.
- 3.1.2 Context Views were also provided at Appendix 3 to the LVA, which includes photographs of views within the Site, and Representative Viewpoints, which includes photomontage visualisations from a selection of the viewpoints, at Appendix 8 to the LVA.
- 3.1.3 I have prepared additional figures to aid with understanding the effects of the Proposed Development, which are presented at Annex A to this Landscape Statement of Case:
- Figure 1: Viewpoint Locations
 - Figure 2: Site Context and Layout
 - Figure 3: Visual Effects Before Mitigation
 - Figure 4: Visual Effects After Mitigation
- 3.1.4 An initial 5km study area from the site was used for the LVA. The main focus of the assessment was a radius of 2km from the site as it was considered that beyond this distance, even with good visibility, the proposed development would not be readily perceptible. I undertook a site visit to the primary areas of visibility within 2km of the Site, including visiting the Site itself and the assessment viewpoints, as well as additional locations mentioned in the Wynne-Williams review, in August 2025. I agree that a 2km study area is sufficient to identify the main notable effects of the Proposed Development, which was also agreed in the Wynne-Williams review.
- 3.1.5 The methodology used for the assessment is set out within Section 2 and Appendix 2 of the LVA. The LVA was undertaken in accordance with Guidelines for Landscape and Visual Impact Assessment, Version 3 (LI & IEMA, 2013).
- 3.1.6 Having fully reviewed the LVA, I am broadly in agreement with the judgements made in the LVA in relation to the scale of both landscape and visual effects. However, as I set out below, in some cases I disagree with the approach to assessing sensitivity and the resulting level of effects reported in the submitted LVA.

3.2 The Proposed Development and Mitigation Measures

- 3.2.1 The Proposed Development allows for fixed mounted panels (up to a maximum 4 metres in height) to be arrayed across the site; arranged broadly east-west, with the majority of panels facing south. The gaps between panels and rows would be grassed.
- 3.2.2 The layout of the Proposed Development and the proposed mitigation measures are shown at Appendices 9 and 10 to the LVA. These have been reproduced on an aerial photograph base at Annex A, Figure 2 to this Landscape Statement of Case to illustrate how the proposed planting areas relate to existing vegetation around the Site.
- 3.2.3 Paragraph 4.6 of the LVA sets out the mitigation measures incorporated into the development stages of the Proposed Development, including locating the Proposed Development away from visual receptors (meaning

residential properties); reflecting the underlying landscape pattern; locating buildings and structures to largely minimise visual effects; and offsetting the proposed solar panels from the site boundaries.

- 3.2.4 Paragraphs 4.7-4.12 of the LVA sets out additional landscape mitigation measures. These identify a number of factors, but do not specifically set out the reasons for the locations of proposed mitigation planting. This is addressed in the response to the Wynne-Williams review as follows:

“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.”

- 3.2.5 I agree that the proposed mitigation planting comprising reedbeds and linear tree belts along field boundaries, with blocks around buildings and structures broadly reflects the intermittent nature of vegetation within the fens broadly and in the vicinity of the Site more specifically.
- 3.2.6 As set out within section 4 of the Landscape and Ecological Management Plan (LEMP) submitted with the planning application, new hedgerow and tree plants will typically be planted as 1+1 transplants at 80-100cm in height. To provide an element of maturity to the planting, the LEMP indicates that a proportion of the trees within the proposed woodland copses would be planted as standards (250-300cm height), select standards (300-350cm) and heavy standards (300-350cm height).

3.3 Landscape Character Baseline and Effects

Landscape Elements and Features

- 3.3.1 Effects on Landscape Elements and Features are set out in section 6 of the LVA. These features are illustrated at Appendix 4 to the LVA. The assessment of effects on Landscape Elements and Features considers the following factors:
- Topography - reporting minor changes to the site’s landform during the construction period, restricted to temporary measures associated with the erection of the solar panels and associated structures/buildings and the construction of the proposed access track. Such changes would be localised and returned to the existing conditions immediately at the end of the construction works. There would be no further changes to the topography during the operational phase.
 - Arable land – reporting the replacement of arable land with grassland beneath and around the solar panels and arrays, for the duration of the operational phase of the Proposed Development.
 - Public Rights of Way – reporting the intent to retain the existing routes across the site.
 - Woodland and hedgerow resource – reporting that the only existing copse on the site would be retained as an integral part of the proposed solar farm development, with the proposed solar panels and infrastructure set back from the woodland edge to help ensure its long-term viability. Additional new planting is proposed within the Site as shown at Appendices 9 and 10 to the LVA.
 - Water Features – reporting that the drainage channels would be retained on their existing alignments as an integral component of the proposed development and protected as necessary during the construction phase as part of an agreed Construction Management Plan for the Proposed Development.
- 3.3.2 I agree with the description of changes to these elements and features as set out in the LVA. For the avoidance of doubt, my view is that the consideration of PRoW within this section of the assessment should solely relate to the physical effects of the Proposed Development on the PRoW network and that effects on users of the PRoW should be considered under Visual Effects.

Landscape Character

- 3.3.3 As set out in section 2 above, effects on landscape character is one of the reasons for refusal given by Fenland District Council.
- 3.3.4 Effects on Landscape Character are set out at section 7 of the LVA. The Site does not contain nor is it covered by any statutory or non-statutory landscape designations. As explained in Section 3 of the LVA, the Site is located within National Character Areas (NCA) 46 The Fens. At the local level, neither FDC nor SHDC have specific published landscape character assessments. The LVA identifies that SHDC has a Strategic Landscape Capacity Study¹, which has particular reference to wind turbine development. In addition, FDC has Wind Turbine Development Policy Guidance², which formed part of the evidence base for the adopted Local Plan. Both of these documents identify landscape character types (LCT) or areas (LCA) across the Districts. The plans illustrating the LCTs and LCAs in the two Districts are reproduced at Annex B to this Landscape Statement of Case. Within SHDC, the Site falls within the 'Peaty Fens' LCT, with the key characteristics of:
- Flat landform
 - Geometric/linear fields
 - Linear settlement pattern
 - Isolated farmsteads and associated tree belts
- 3.3.5 Within FDC, the Site falls within 'The Fens' LCA. The key characteristics of this area identified within the Wind Turbine Development Policy Guidance include:
- Large scale, flat and open landscape with extensive views and large skies
 - Largely unsettled, arable landscape with isolated villages and scattered individual properties
 - Individual properties often surrounded by wind breaks including numerous conifers
 - Rectilinear field structure divided by the pattern of artificial drainage ditches
 - Very few hedgerows in landscape
 - Productive and functional landscape with few recreational uses
 - Long straight roads, elevated above surrounding fields but locally uneven
- 3.3.6 In both cases, the Site is located within an extensive LCT/LCA that covers a broad area of fenland. The Peaty Fens LCT extends along the southern and western edges of SHDC, following roads to the north of the Site and starting approximately 2.4km to the north of the Site. The Fens LCA covers much of FDC, with the Wisbech Settled Fen located approximately 2.4km to the south east, towards the centre of Gorefield. The characteristics of the two areas on each side of the local authority boundary are broadly consistent, indicating that there is no distinct change in character across the boundary, which I consider to be correct having visited the Site. Section 3 of the LVA provides an assessment of the character of the Site and its surrounding context, which demonstrates how the characteristics of the very large LCT/LCA are present at the more local scale.
- 3.3.7 The assessment provided in the LVA concludes that the LCT/LCA is of medium value, medium susceptibility to the type of development proposed and medium sensitivity. The Wynne-Williams review indicates that it would be beneficial for some narrative text summarising where the Site gains its value. This is already provided in paragraphs 7.1-7.9 of the LVA, but for clarity, I have summarised these descriptions, along with the factors relating to susceptibility of the landscape in Annex C. In summary, I consider that the value of the landscape is medium/low, using the criteria in the LVA methodology, as it is well managed as part of the generally intensively farmed regime, with a degree of recreational value through the PROW in the vicinity of the Site, but is otherwise an undesignated 'ordinary' landscape which is not a 'valued landscape'. The FDC reason for refusal references paragraph 187(b) of the National Planning Policy Framework, which relates to the intrinsic character and beauty of the countryside, rather than paragraph 187(a), which relates to

¹ John Campion Associates Ltd (2003) Strategic Landscape Capacity Study for South Holland District Council

² The Landscape Partnership (2009) Wind Turbine Development Policy Guidance

protecting and enhancing valued landscapes. I regard this as acknowledgement from FDC that they do not consider the Site to be located within a valued landscape.

- 3.3.8 Susceptibility to the type of development proposed (based on the advice provided in 'An Approach to Landscape Sensitivity (Natural England, June 2019) is considered in Annex C of this Landscape Statement of Case. The susceptibility is identified as being Medium, taking account of a range of factors including the flat landform that gives rise to wider visibility; the enclosure provided in some areas by tree belts and woodlands; the conspicuous settlement and human influences on the landscape, and the lower susceptibility of the medium to large scale arable fields, and uniform landscape. Considering susceptibility and value together I assess the LCT/LCA to have a Medium to Medium/low sensitivity, which is slightly less than the Medium sensitivity identified in the submitted LVA.
- 3.3.9 Effects on landscape character during construction and early operation would arise within the Site as a result of the change of use, and in nearby areas where there would be close views of the solar farm, giving rise to a change to the largely rural undeveloped character. I agree with the findings of the Wynne-Williams review that the scale of effects on landscape character within the Site are not overtly stated within the submitted LVA, beyond reference at paragraph 7.16 that there would be a notable change to the character of the Site. I consider that changes to character within the Site would be Large scale, where the Proposed Development would form a major alteration to key elements, features, qualities and characteristics of the landscape such that the baseline will be fundamentally changed.
- 3.3.10 The changes to character would gradually reduce to Small scale up to 0.4km (from the nearest panels) to the south, as far as vegetation at King Edwards Farm and the distinctive linear feature of North Level Main Drain, which often has linear strips of vegetation along it; up to 0.4km to the west as far as Guanockgate Road (from the nearest panels) and up to approximately 0.6km to the north and east where the field pattern is more open and distance would come into effect in terms of the visibility of the Proposed Development. The BESS would result in a very localised change to character – only where it is located – given it would be situated adjacent to the existing woodland copse at the centre of the Site, surrounded by solar panels of a similar height. The DNO substation would be located adjacent to an existing pylon within the Site and would include taller elements than the surrounding solar arrays. Woodland planting is proposed around the eastern and southern boundaries of the substation compound to provide screening, but initial visibility would extend further giving rise to changes to character to the south east of the Site, within the same extents as the effects from the proposed solar development would be experienced.
- 3.3.11 These combined Medium-term changes would affect a Localised extent of the host Peaty Fens LCT/The Fens LCA, giving rise to a Medium magnitude of impact. Effects would be Moderate and Adverse. This is consistent with the findings of the submitted LVA.
- 3.3.12 Given the nature of the proposed mitigation planting, there would be some reduction in effects on landscape character once the planting is established, but they would not become Negligible. Whilst there would be continued Large scale effects within the Site itself, Long-term changes across the host Peaty Fens LCT/The Fens LCA would be of Small/Negligible scale up to 0.4km to the south and west, and up to approximately 0.6km to the north and east, affect a Localised extent of the host Peaty Fens LCT/The Fens LCA, giving rise to a Small magnitude of impact. Effects would be Minor and Adverse. This is consistent with the findings of the submitted LVA.

3.4 Visual Receptor Baseline and Effects

- 3.4.1 Visual effects are not referenced in the FDC reasons for refusal. However, as set out in section 2 above, the Wynne-Williams review, the SHDC delegated officer report and a number of the representations received on the planning applications refer to visual effects and I therefore cover visual effects below.
- 3.4.2 Visual receptors within 2km of the Site consist primarily of local residents and visitors close to their homes or travelling for local journeys along rural roads, or enjoying the recreational opportunities offered by PRoW.
- 3.4.3 The submitted LVA provides an assessment of effects on visual receptors within 2km of the Proposed Development, based on the eight representative viewpoints. The Wynne-Williams review queried the

rationale for the provision of photomontage visualisations from only a selection of the representative viewpoints. I consider that the selected viewpoints, representative viewpoints 1, 3, 4 and 6, provide an adequate representation of the likely visual effects of the Proposed Development, presenting a range of distances and directions from the Site, and illustrating views from the more sensitive visual receptors in the surrounding context.

- 3.4.4 The Wynne-Williams review raised concerns in relation to the sensitivities attributed to each viewpoint, highlighting that the majority of viewpoints are representative of more types of visual receptors than just the lower sensitivity local road users considered within the LVA. I set out below in Table 1 a summary of the receptors represented at each viewpoint and the scale of change that would be experienced from them. These are my own judgements as the scale of effect is not stated within the submitted LVA.

Table 1: Viewpoint analysis summary

No.	Viewpoint	Distance, Direction	Receptors	Scale of change to views (Medium-term)	Scale of change to views (Permanent - after 7-10 years)
1	Guanockgate Road	0.4km, west	Local road users, PRoW users (residents to a lesser extent)	Medium, adverse	Medium/small, adverse
2	Honeyhill Farm	0.8km, east	Local road users, residents	Negligible, neutral	Negligible, neutral
3	Ashtree Farm	0.5km, east	Local road users (residents to a lesser extent)	Medium, adverse	Medium/small, adverse
4	Goredike Bank and Turnover Road	0.6km, south	Local road users (residents to a lesser extent)	Medium/small, adverse	Medium/small, adverse
5	Guanock House	1.1km, north west	Local road users, PRoW users, residents	Small, adverse	Small, adverse
6	Sutton St Edmund	0.9km, west	Local road users, residents	Small, adverse	Small, adverse
7	Elloe Bank	0.4km, north	Local road users (residents to a lesser extent)	Medium/small, adverse	Medium/small, adverse
8	Treading Bank	0.6km, east	Local road users, PRoW users (residents to a lesser extent)	Medium/small, adverse	Medium/small, adverse

- 3.4.5 Effects beyond these locations, beyond approximately 1.5km from the Proposed Development, would be Negligible. Figures 1 and 2 in Annex A illustrate the viewpoint locations. Figures 3 and 4 in Annex A illustrate viewpoint locations and the scale of changes to views (the primary factor in determining the magnitude of visual effect) during construction and early operation (Figure 3) and once mitigation planting has matured (Figure 4). As none of the representative viewpoints consider the PRoW that pass through the Site, I deal with these in a separate section below.
- 3.4.6 As per the methodology at Appendix 2 to the submitted LVA, users of these routes would be making local journeys travelling at moderate or relatively low speeds and would have a Medium susceptibility to changes to views of Low value (the area is not designated for scenic views and there are no promoted viewpoints) and Medium sensitivity. Residents of properties along the routes would have a High susceptibility to changes to views of Low value and I consider that this would result in High/medium sensitivity.
- 3.4.7 As illustrated by Figures 3 and 4 in Annex A, the greatest effects on visual receptors, beyond those for users of PRoW within and adjacent to the Site, would arise for users of the minor roads within the vicinity of the Site. This includes Guanockgate Road to the west and the roads along Treading Bank (which becomes a

Byway Open to All Traffic closer to the Site), Broad Dove West, Fen Lane (which is part Byway Open to All Traffic and part 'other route with public access') and Elloe Bank to the east. The roads to the east of the Site are much less used, providing access to the farms and properties along them, with the surfacing of parts of them very poor and almost impassable in an ordinary car.

- 3.4.8 From Guanockgate Road, there would be largely open views of fences, solar arrays and CCTV cameras, separated from the road by an arable field where the road runs in parallel to the western boundary of the Site, as illustrated by viewpoint 1 of the LVA, becoming more distant as the road moves further from the Site. As shown on Figure 2 at Annex A, residential properties along Guanockgate Road are frequently enclosed by vegetation. Views of the Proposed Development would give rise to Medium scale effects before mitigation planting matures. These effects would be medium-term and affect a localised extent of the road. These changes would give rise to a Medium magnitude of impact and effects would be Moderate and Adverse for road users. This is consistent with the findings of the submitted LVA. Although there are residential properties along the road, the enclosure by existing garden vegetation would result in a reduced scale and magnitude of effect to that experienced by road users.
- 3.4.9 These effects would reduce to Medium/small scale once planting has grown, as a result of the proposed intermittent planting along the western boundary of the Site. These changes would give rise to a Medium/low magnitude of impact and effects would be Moderate/minor and Adverse for road users. This is a greater level of effect than reported in the submitted LVA, as I do not consider that the proposed mitigation planting would result in the level of visual screening recorded in the submitted LVA, given its intermittent design.
- 3.4.10 From the local roads east of the Site, which includes the Byway Open to All Traffic along part of Treading Bank, as illustrated by representative viewpoints 3, 7 and 8, the existing copse within the Site and vegetation around farms and individual properties provide a degree of screening in views, breaking up views of the Site and towards the Proposed Development. There would be views of fences, solar arrays and CCTV cameras, as well as elements of the DNO substation, with intermittent screening of parts of the Proposed Development by the existing vegetation. As shown on Figure 2 at Annex A, residential properties to the east of the Site are generally enclosed by vegetation. Views of the Proposed Development would give rise to Medium to Medium/small scale effects. These changes would give rise to a Medium magnitude of impact and effects would be Moderate and Adverse for road users. This is consistent with the findings of the submitted LVA. Although there are residential properties along the road, the enclosure by existing garden vegetation would result in a reduced scale and magnitude of effect to that experienced by road users.
- 3.4.11 These effects would reduce to Medium/small scale once planting has grown, as a result of the additional screening from the proposed intermittent planting along the eastern boundary of the Site and around the DNO substation. These changes would give rise to a Medium/low magnitude of impact and effects would be Moderate/minor and Adverse for road users. This is a greater level of effect than reported in the submitted LVA, as I do not consider that the proposed mitigation planting would result in the level of visual screening recorded in the submitted LVA, given its intermittent design.
- 3.4.12 People living in and visiting Sutton St Edmund would experience Small scale visual effects as a result of visibility of the solar arrays, fences and CCTV cameras, when looking out across the fields to the east of the village. Viewpoint 6 of the LVA and Illustrative Views 1 and 2 in Annex D to this Landscape Statement of Case illustrate the intermittent views from within the village and from the approaches along Broadgate Road from the north and south, with intervening vegetation breaking up views of the Site and towards the Proposed Development. Homes with views from windows and gardens facing towards the Site would experience similar effects. Views of the Proposed Development would give rise to Small scale effects. These effects would be experienced for the duration of the Proposed Development and affect a limited extent of the village. These changes would give rise to a Low magnitude of impact and effects would be Minor and Adverse. The growth of mitigation planting would not reduce this visibility. This is consistent with the findings of the submitted LVA.

- 3.4.13 To the south of the Site, representative viewpoints 2 and 4 illustrate visibility from the area around Harold's Bridge and Bradley's Bridge. The submitted LVA considered these viewpoints to represent road users only, but they are also representative of views from some of the residential properties close by. However, as is characteristic of properties within the study area, many are enclosed by mature garden vegetation. The Wynne-Williams review raised concerns that the PRoW to the south west of Harold's Bridge had not been assessed within the submitted LVA. As shown on Figure 2 at Annex A and illustrative viewpoint 3 in Annex D, the view is similar to that experienced from representative viewpoint 4, but with a greater degree of intervening vegetation around isolated properties or along the northern bank of North Level Main Drain. From Goredike Bank and Turnover Road, at viewpoint 2, which is the closest publicly accessible point to the Site boundary south of North Level Main Drain, there would be open views of the fences, solar arrays and CCTV cameras beyond the drain and an arable field, with elements of the DNO substation also visible above the arrays. Viewpoint 2 has the most open view of the Proposed Development, with the extent of visibility and the scale of effect reducing with distance from the Site.
- 3.4.14 Views of the Proposed Development from the vicinity of the junction of Goredike Bank and Turnover Road would give rise to Medium/small scale effects. These effects would be medium-term and affect a localised extent of the local road network. These changes would give rise to a Medium magnitude of impact and effects would be Moderate and Adverse for road users. This is consistent with the findings of the submitted LVA. Although there are residential properties along the roads and the PRoW along the northern bank of North Level Main Drain to the west, existing garden vegetation and increased distance from the Site would result in a reduced scale and magnitude of effect to those experienced by road users. Although there would be some additional screening provided by the proposed mitigation planting along the southern boundary of the Site, this would be more limited in views from the south and the growth of mitigation planting would not reduce this visibility to a notable degree. This is a greater level of effect than reported in the submitted LVA, as I do not consider that the proposed mitigation planting would result in the level of visual screening recorded in the submitted LVA, given its intermittent design.

Public Rights of Way

- 3.4.15 Effects on PRoW are not referenced in the FDC reasons for refusal. However, as set out in section 2 above, the Wynne-Williams review, the SHDC delegated officer report and a number of the representations received on the planning applications refer to visual effects and I therefore cover visual effects for users of the PRoW within the Site below. These effects were not assessed within the submitted LVA. As set out above in relation to the Landscape Elements and Features, the PRoW would remain open throughout the construction and operation of the Proposed Development.
- 3.4.16 As per the methodology at Appendix 2 to the submitted LVA, users of these routes would have a High susceptibility to changes to views of Low value (the area is not designated for scenic views and there are no promoted viewpoints). I consider that this would result in High/medium sensitivity.
- 3.4.17 As previously discussed in section 2, there are four PRoW within or immediately adjacent to the Site:
- Public Bridleway 13: Tydd St Giles – is approximately 1.1km long and runs broadly north-south through the centre of the Site. Almost its full length is within the Site;
 - Public Byway 19: Tydd St Giles – is approximately 1.4km long and runs along the southern boundary of the Site east of Public Bridleway 13: Tydd St Giles. Approximately two thirds of the route follows the Site boundary, before continuing east to become Treading Bank. A further short stretch (0.4km) of Public Byway (Path Number 12: Newton-in-the-Isle) runs south from the junction of Public Bridleway 13 and Public Byway 19 on the Site boundary.
 - Public Footpath SuSE/8/1 - is approximately 0.5km long and runs along the access track of the Proposed Development.
 - Public Footpath Tydd/4/1 - is approximately 0.7km long and runs broadly east-west along a farm track through the western part of the Site, connecting Public Footpath SuSE/8/1 and Public Bridleway 13.

- 3.4.18 As shown on Figure 2 at Annex A, there are other PRow within the 2km study area, these have now either been assessed in relation to visual receptors in the preceding section of this Landscape Statement of Case or they are beyond the extent of notable visibility outlined above.
- 3.4.19 Views across the Site from Public Bridleway 13 (also known as Tydd St Giles 13/283/1) are shown at Appendix 3 to the submitted LVA, with Context Views 1 and 3 looking along the bridleway. In addition, representative viewpoint 1 is located close to the point at which Public Footpath SuSE/8/1 joins Guanockgate Road.
- 3.4.20 There are intermittent areas of proposed planting along stretches of Public Bridleway 13, Public Byway 19 and Public Footpath Tydd/4/1. The proposed fences would be offset 4m to either side of the PRow, as agreed by the Applicant in November 2024, in response to the Tydd St Giles Parish Council objection. Beyond the 4m offset, there would be open views of fences, solar arrays and CCTV cameras, with views of the proposed BESS from parts of Bridleway 13: Tydd St Giles and of the DNO substation within the solar arrays from the southern extent of Public Bridleway 13: Tydd St Giles and parts of Public Byway 19: Tydd St Giles.
- 3.4.21 From Public Footpath SuSE/8/1, there would be open views of the fences, solar arrays and CCTV cameras to the east, for users of the PRow traveling east. Changes to views would be Large scale and Adverse, reducing to Medium scale further west with greater distance from the Proposed Development, as illustrated by viewpoint 1. Whilst proposed planting close to the end of the access track would provide screening of some areas of the Proposed Development over time, views from much of the route would remain open.
- 3.4.22 From Public Footpath Tydd/4/1 and Public Bridleway 13: Tydd St Giles, there would be open views of the fences, solar arrays and CCTV cameras to both sides of the routes for much of their length. The existing retained copse would provide some screening along the bridleway and proposed planting is proposed intermittently along stretches of both routes, which would provide screening of some areas of the Proposed Development over time. For both PRow, views from much of the route would remain open throughout the lifetime of the Proposed Development. Changes to views would be Large scale and Adverse.
- 3.4.23 From Public Byway 19: Tydd St Giles and the northern end of Public Byway 12: Newton-in-the-Isle, the Proposed Development would be located on one side of the route only. There would be open views of the fences, solar arrays and CCTV cameras to the north, as well as visibility of the DNO substation. Proposed planting would reduce visibility of the DNO substation over time, but open views of the fences, solar arrays and CCTV cameras would remain. Changes to views would be Large scale and Adverse.
- 3.4.24 Effects on PRow users within the Site would continue for the duration of the Proposed Development, and would be wide spread within the context of the PRow network within and adjacent to the Site. They would typically be Large scale and Adverse. The magnitude of impact on users of these routes would be High and effects would be Major and Adverse. Whilst these impacts are acknowledged, the Applicant has agreed mitigation measures that both local planning authorities and Tydd St Giles Parish Council have found to be acceptable in terms of resolving their initial concerns in relation to impacts on PRow. In addition, the mitigation measures resolve the concerns raised by the British Horse Society, with the exception of their request to upgrade the public footpaths between Guanockgate Road and Public Bridleway 13: Tydd St Giles to a public bridleway.

3.5 Summary

- 3.5.1 The flat topography and the layers of vegetation around properties and in some cases along field boundaries provide a degree of visual containment within the large scale fenland landscape. These would limit the landscape and visual effects arising from the Proposed Development. Landscape effects would be confined to an area extending 0.4km to the south, as far as vegetation at King Edwards Farm and the North Level Main Drain; up to 0.4km to the west as far as Guanockgate Road and up to approximately 0.6km to the north and east where the field pattern is more open. Visual effects would extend to a little over 1km in all directions, with visual receptors consisting primarily of local residents and visitors close to their homes or travelling for local journeys along rural roads, or enjoying the recreational opportunities offered by PRow.
- 3.5.2 FDC refer to the Proposed Development as a *"large alien feature within the Countryside"*. It is my opinion that this is an unnecessarily pejorative terminology to use. Solar farms in the countryside are not such an

uncommon feature as to be considered alien, and as set out above the extent of landscape and visual effects that would result from the proposed development would be very localised. This in part results from the low lying nature of solar development, which results in lesser visual impacts than other built development in the countryside such as agricultural barns and residential development. The proposed mitigation planting would also provide some screening of the Proposed Development whilst reflecting the intermittent nature of vegetation within the fens broadly and in the vicinity of the Site more specifically.

4 Summary and Conclusions

- 4.1.1 The flat topography and the layers of vegetation around properties and in some cases along field boundaries provide a degree of visual containment within the large scale fenland landscape. These would limit the landscape and visual effects arising from the Proposed Development. Landscape effects would be confined to an area extending 0.4km to the south, as far as vegetation at King Edwards Farm and the North Level Main Drain; up to 0.4km to the west as far as Guanockgate Road and up to approximately 0.6km to the north and east where the field pattern is more open. Visual effects would extend to a little over 1km in all directions, with visual receptors consisting primarily of local residents and visitors close to their homes or travelling for local journeys along rural roads, or enjoying the recreational opportunities offered by PRoW.
- 4.1.2 No valued landscapes or recognised scenic or valued views would be affected by the Proposed Development.
- 4.1.3 Effects on landscape character would be confined to a small part of the host Peaty Fens LCT/The Fens LCA. Mitigation planting would result in a small reduction in effects beyond the Site once mature. Effects would be Moderate and Adverse during construction and early operation of the Proposed Development. Over time, effects on landscape character would reduce to Minor and Adverse, after the proposed planting matures.
- 4.1.4 During construction and early operation, the following visual effects would arise:
- Major, Adverse effects on users of PRoW within or immediately adjacent to the Site;
 - Moderate, Adverse effects on users of the roads to the east and west of the Site;
 - Moderate, Adverse effects on users of the roads the vicinity of the junction of Goredike Bank and Turnover Road; and
 - Minor, Adverse effects on people living in and visiting Sutton St Edmund.
- 4.1.5 After planting matures, the following visual effects would remain:
- Major, Adverse effects on users of PRoW within or immediately adjacent to the Site;
 - Moderate/minor, Adverse effects on users of the roads to the east and west of the Site;
 - Moderate, Adverse effects on users of the roads the vicinity of the junction of Goredike Bank and Turnover Road; and
 - Minor, Adverse effects on people living in and visiting Sutton St Edmund.
- 4.1.6 Whilst there are residential properties located along many of the local roads in the vicinity of the Site, they are generally well enclosed by mature vegetation and would have limited views towards the Proposed Development.
- 4.1.7 Whilst there would be Major, Adverse effects for users of the PRoW within the Site, the Applicant has agreed mitigation measures that both local planning authorities and Tydd St Giles Parish Council have found to be acceptable in terms of resolving their initial concerns in relation to impacts on PRoW.
- 4.1.8 I do not consider that the very localised effects of the Proposed Development would result in a *“large alien feature within the Countryside”*.