

# Proposed Solar Farm on Land South of Potterne Park Farm

## LVA Review

### 1. Introduction

- 1.1 This report comprises a review of the landscape and visual appraisal (LVA, Tir Collective, December 2023) for the development of a solar farm on land south of Potterne Park farm, Potterne (ref PL/2023/10332). It has been commissioned by the Potterne Solar Action Group, in support of their consultation response, and has been prepared by Peter Radmall, MA Geography, B.Phil Landscape Design, CMLI.
- 1.2 The scope of this review has been to:
- Review the application docs/drawings/evidence base;
  - Review the LVA and comment on its robustness in terms of compliance with best practice;
  - Comment on the findings of the LVA and whether they seem reasonable;
  - Identify any concerns, queries, omissions or potential requests for clarification or further information; and
  - Set out the conclusions of the above in the form of this report and related advice.
- 1.3 Compliance with best practice has been assessed in relation to the Guidelines for Landscape and Visual Impact Assessment (GLVIA3, LI/IEMA, 2013) and experience drawn from a large number of LVIA/LVAs, reviews and planning appeals. These have included several solar energy projects. Reference is also made to Landscape Institute Technical Guidance Note TGN06/19: Visual Representation of Development Proposals.
- 1.4 LVAs are essentially an abbreviated form of landscape and visual impact assessment (LVIA), often used where proposals are of modest scale and are not subject to environmental impact assessment (EIA). GLVIA3 advises that “the broad principles and the core of the approach is similar in each case” [GLVIA3 1.3]. An LVA should therefore comply (to a proportionate degree) with the LVIA

methodology, and should be read with the same expectations relating to rigor and transparency.

1.5 Reviewing LVAs/LVIAs can be complicated, and in order to simplify matters the author has applied his own compliance checklist, as set out in Section 2. It should also be noted that the visual material in the LVA (zone of theoretical visibility and photography) has not to date been the subject of a technical audit as part of this review, and has essentially been taken as read.

1.6 The following limitations of this review should be noted:

- It does not purport to be an LVA/LVIA in its own right.
- It does not attempt to identify and categorise all the potential effects;
- It places a degree of reliance on the submitted material.
- Because of timing constraints, a site visit has not been carried out at this stage. However, the author has been provided with local knowledge, including supplementary photos, by his client.
- Issues such as design, sustainability, biodiversity or cultural heritage have not been addressed, except where these may influence landscape/visual matters.

## 2. Compliance Checklist

2.1 The checklist used for this review is presented in **Table 1** below. Shaded cells denote matters for which the author considers there to be non- or partial compliance or which are otherwise worthy of note. These matters are then summarized in Section 3.

**Table 1: Compliance Checklist**

Criterion	Response	Comment
<b>1. Overall Approach</b>		
1.1 Does the assessment distinguish between landscape and visual effects?	YES	
1.2 Are the methodology and terminology clearly explained?	YES	Ref LVA Appendix 2 – but queries arise when this is compared to the findings
1.3 Does the assessment report the magnitude of effects and whether they are beneficial or adverse?	PARTLY	But no beneficial effects are identified
1.4 Does the assessment distinguish between the effects of construction and the completed development?	YES	And also de-commissioning
1.5 Where a potential for adverse effects has been identified, has mitigation been proposed?	PARTLY	In the form of a Landscape and Ecology Plan, although it is not clear which elements of this are primarily intended to provide landscape/visual mitigation
1.6 Has the effectiveness of this mitigation been assessed, e.g. in the form of a Year 15 scenario?	NO	Operational effects are assessed as a single scenario, and it is not clear what (if any) allowance has been made for landscaping becoming established
1.7 Has the potential for adverse effects to arise from this mitigation been considered (e.g. obstruction of existing views)?	NO	Not explicitly
1.8 Is the geographical scope of the appraisal appropriate?	PARTLY	Comprises a 3km radius around the site, informed by a zone of theoretical visibility (ZTV). Whilst this includes the chalk scarp to the NE, it excludes the sections to the SE/SW.
1.9 Have the development and its sources of impact been adequately described?	PARTLY	No proposed layout plan is provided. No explicit reference is made to the landscaping as a source of impact.

<b>2. Presentation</b>		
2.1 Is the LVA clearly structured and presented?	YES	
2.2 Is it adequately supported by:		
- Maps/plans?	PARTLY	No proposed layout plan is provided

- ZTV?	YES	Bare ground/screened versions - but this has not been subject to technical audit
- Photos?	YES	But these have not been subject to technical audit.
- Visualizations?	PARTLY	As annotated photos – in the absence of montages/wireframes, sections or photos of completed solar farms, it is not easy to envisage the extent of development or the degree to which it may be visible and/or obstruct specific views.

<b>3. Landscape Character</b>		
3.1	Has reference been made to published character types/areas at the appropriate levels?	YES But they are not assessed as landscape receptors
3.2	Have the character of the site and its immediate context been adequately described?	YES But they are not treated as landscape receptors for assessment purposes
3.3	Has its representativeness of the published character types/areas been assessed?	NO This should have informed the appraisal of landscape value
3.4	Have relevant designations been identified?	YES The North Wessex Downs AONB is the main consideration – but impacts on its setting have not been assessed explicitly
3.5	Have the relevant landscape receptors been assessed?	NO There is no explicit assessment of the effects on overall site character, its perceptual attributes (e.g. greenfield character/openness), its landscape context, the published character types/areas or the setting of the AONB.
3.6	Has landscape sensitivity been assessed on the basis of its susceptibility and value?	YES But some of the assumptions on which this is based can be queried.
3.7	Has the LVA considered whether the site may form part of a valued landscape*?	NO But this is essentially a policy test, and may not necessarily fall within the scope of an LVA.

<b>4. Visual Impact</b>		
4.1	Has a ZTV/ZVI been produced?	YES See 2.2 above – but note the absence of a technical audit and the query about its geographical extent at 1.8.
4.2	Were the assessment views agreed with the LPA?	NO LVA states that no response was received from the Council
4.3	Are these views sufficiently representative?	NO Potential omissions have been identified in relation to views from nearby PRoWs and from the chalk scarp
4.4	Have seasonal changes been taken into account?	NO Not explicitly, but the photos show “winter views” (March) and therefore represent a worst-case.
4.5	Can the photos/visualizations be relied upon?	PARTLY Assumption, subject to the comments at 2.2 – although it is noted that they do not show the full extent of the site.

4.6	Have all potential receptors been identified?	PARTLY	Whilst the relevant receptor groups have been identified, several receptor locations (PRoWs) have been omitted.
4.7	Has their sensitivity been robustly assessed?	NO	Some queries have been raised

<b>5. Policy Considerations</b>			
5.1	Does the LVIA summarize the relevant policy context?	YES	
5.2	Does the LVIA comment on the degree to which the proposed development complies/conflicts with relevant policy/guidelines?	NO	This does not appear to have been one of the main purposes of the LVA

### 3. Key Findings

3.1 The following observations about the LVA, and its potential deficiencies, should be noted:

- i. Visual material has been taken as read (in the absence of a technical audit forming part of this review). However, the photos do not appear to have been presented wholly in accordance with the technical guidance (e.g. they do not always show the full extent of the site).
- ii. The assessment of operational effects has not explicitly considered Year 1 and residual (Year 10/15) scenarios.
- iii. The effectiveness of mitigation and the potential for it to give rise to adverse (notably visual) effects have not been explicitly reported.
- iv. The extent of the study does not extend to the chalk scarp in all directions (even though the scarp is identified as a landscape receptor).
- v. The published character types/areas have not explicitly been treated as landscape receptors.
- vi. The application site and its local context have not explicitly been treated as landscape receptors.
- vii. Effects on the setting of the North Wessex Downs AONB have not been assessed.
- viii. Whilst acknowledging that this is an LVA as opposed to an LVIA, it is not entirely clear how the sensitivity of landscape receptors has been established.
- ix. The viewpoints have not been agreed with the Council.
- x. Potential omissions have been identified in relation to short-range (within/approaching the site) and long-range (the chalk scarp) viewpoints.

- xi. Sources of impact have been inadequately described (e.g. in terms of site coverage) and illustrated (e.g. in terms of the absence of sections, montages or photos).
- xii. Inconsistencies have been raised in relation to the sensitivity of visual receptors.
- xiii. Queries have been raised in relation to the potential under-reporting of impacts (magnitude of change).

3.2 Not all of these points necessarily imply that the conclusions of the LVA may be unsound. In addition, the absence of a technical audit of the visual evidence does not automatically suggest that it is inaccurate – simply that its accuracy cannot currently be confirmed. However, several implications for the robustness of the appraisal have been identified, sufficient to question its reliability - these are discussed in Section 4.

## 4. Implications for LVA Robustness

4.1 This section addresses the most relevant concerns raised by the review, which may be summarized as follows:

- Assessment scenarios;
- Geographical scope;
- Landscape receptors;
- Sources of impact;
- Viewpoints;
- Receptor sensitivity; and
- Severity of effects.

### Assessment Scenarios

4.2 The LVA considers effects arising from three scenarios: construction, operation and de-commissioning. Whilst these are all relevant, the predominant source of impact in terms of duration (50 years) will be operation. Impacts during construction and decommissioning, whilst intrinsically adverse, will be short-term. The focus of the LVA should therefore have been on operational effects.

4.3 It is normal in LVAs/LVIAs for operational effects to be assessed in relation to two scenarios: Year 1 (year of completion) and a future year allowing for landscaping to have become established. The latter is typically Year 15 for most developments, but Year 10 for solar farms (reflecting their limited height and the fact that mitigation is predominantly provided by hedgerows rather than tree planting). The LVA does not explicitly adopt this approach.

4.4 This has two important implications. Firstly, the scenario to which the operational effects apply is not clear – specifically whether they represent a worst-case (i.e. Year 1). And secondly, the effectiveness of the proposed landscaping cannot be judged (i.e. in terms of whether/how adverse effects at Year 1 may be reduced over time). These are key flaws, which may influence the reliability of the predicted effects.



### Geographical Scope

- 4.5 The LVA covers a study area of c3km around the site (4km when cumulative effects with the existing Lower End solar farm are considered). Whilst this seems to capture most potential receptors, including the AONB to the north-east of the site (at Echilhampton Hill), it omits sections of the chalk scarp to the south. This may be because inter-visibility is restricted, as suggested by the ZTV (although this does not extend sufficiently far south to include all of the scarp).
- 4.6 However, the LVA states that "*The ridge edge overlooks the site from the south and is characteristic in views*" [LVA 4.3.4]. This is a clear indication of inter-visibility, which suggests a potential for impacts and should have been confirmed (even though this part of the scarp does not fall within the AONB, its crest is followed by the Wessex Ridgeway).

### Landscape Receptors

- 4.7 The LVA assesses effects on the following landscape receptors:
- i. Low-lying flat agricultural fields;
  - ii. Large rectangular field pattern;
  - iii. Defined hedgerow structure with some lines of trees/outgrown hedgerow;
  - iv. Overlooked by steep scarp of the chalk uplands; and
  - v. Recreational access along PRowS.
- 4.8 Receptors i-iii are physical attributes of the site and the surrounding vale landscape. Receptor iv relates to the influence of the chalk scarp on its wider context. Receptor v both relates to the site and surrounding area, and influences how these are perceived and the contribution they make to users of the PRowS. This is a "mixed bag" and - whilst relevant - is notable for its omissions. The following are not explicitly assessed as landscape receptors:
- The published landscape types/areas (although these are described as part of the baseline);
  - The overall site;
  - Its local context;

- The perceptual attributes of the site/context (e.g. tranquillity, rurality, openness); and
- The setting of the AONB.

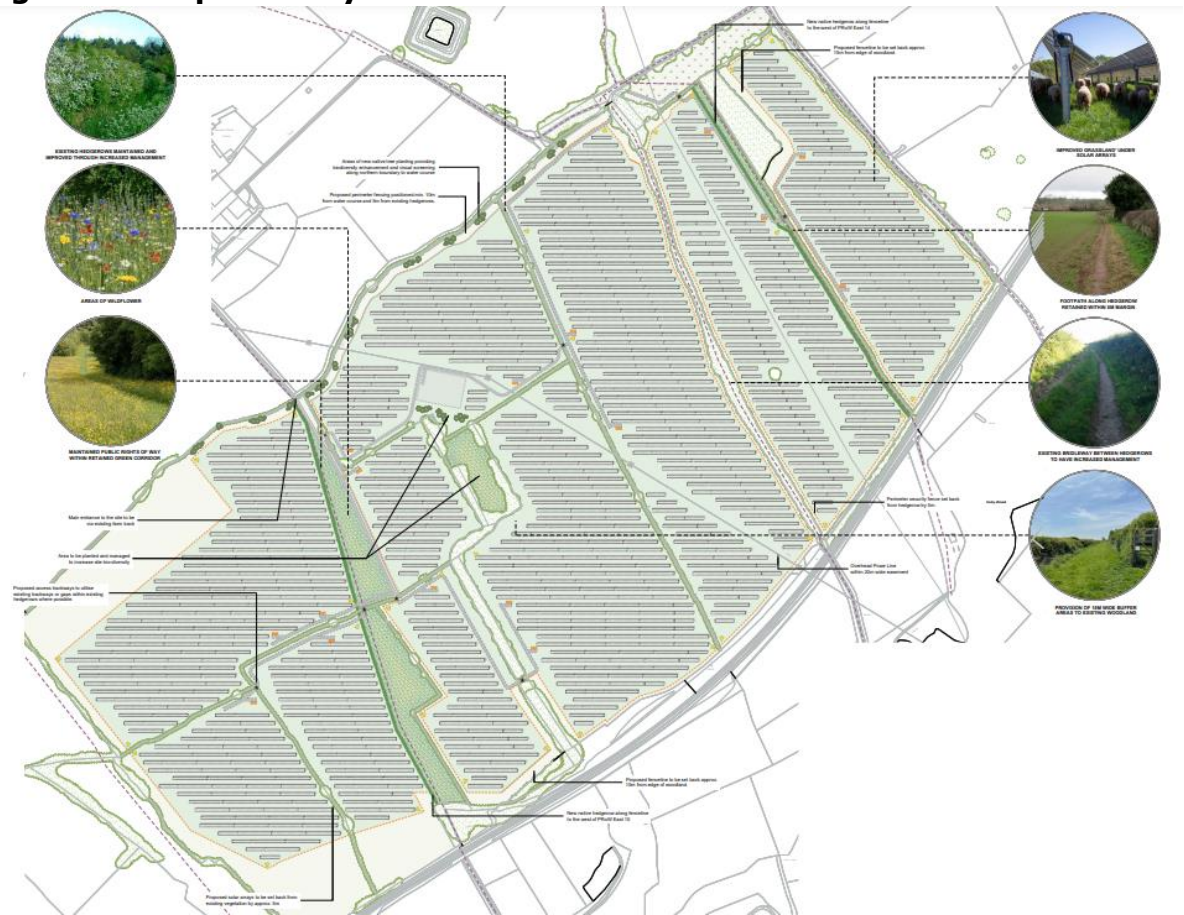
#### Sources of Impact

- 4.9 The LVA provides a somewhat cursory description of the development and its sources of impact (barely two pages). The proposed layout is not shown – for example, in relation to the PRoWs and assessment viewpoints. By way of rectification, the layout is presented in **Figure 1** below. Only one illustration of what is assumed to be a comparable example of an operational solar farm is provided (as a small inset on the Proposed Site Block Plan). Montages or wireframes have not been prepared for any of the views.
- 4.10 It is therefore very difficult to envisage the precise impact on each view, in terms of the extent of the solar arrays – which would occupy the majority (c72%) of the site – and the degree to which they may be visible or even obstruct some (usually close-range) views. As a result, it is equally difficult to judge whether the magnitudes of change identified in the LVA are reasonable (see also below).

#### Viewpoints

- 4.11 The assessment is based on 10 viewpoints. The LVA states that these were not agreed with the Council, due to the lack of a consultation response. The majority (70%) of the views are short- to medium range, either within the site or within 1km of it. Only one view is from the wider scarp, despite the reference to it in the LVA, and its identification as a landscape receptor.
- 4.12 Three views are from within the site, or on/within 100m of its boundary. It is acknowledged that the views are intended to provide a representative sample, rather than comprehensive coverage. However, they currently under-represent the impacts on users of the nearest PRoWs – views from only one of the three PRoWs within the site, and from only 5 of the 10 potential sections of PRoW approaching the site, are included. These limitations should be noted.

**Figure 1: Proposed Layout**



### Receptor Sensitivity

- 4.13 Of the five landscape receptors identified in the LVA, the three directly descriptive of site character (relating to agricultural fields, field pattern and hedgerow structure) are reported to be of “moderate-low” sensitivity. The PRoWs are reported to be of “moderate” sensitivity, and the surrounding chalk scarp of “moderate-high” sensitivity. This is considered to amount to a material under-representation of the sensitivity of the site and its landscape context.
- 4.14 Agricultural fields are by definition highly sensitive to a change of use that will displace their primary function and appearance as farmland. As noted previously, approximately 72% of the site would be transformed into a renewable energy installation. This physical change would be reinforced by its perceptual influence on a landscape which the LVA photos demonstrate is characterized by a greenfield and relatively open character.

- 4.15 This is shown in **Figure 2** (reproduced from LVA baseline photo 01), and reflects its combination of low hedgerows, comparatively sparse tree cover and low-lying terrain, overlooked from the surrounding Greensand. A moderate-high degree of sensitivity (rather than moderate-low) is therefore considered to be more accurate.
- 4.16 This observation is supported by the Landscape Sensitivity Assessment (LSA) for the Wiltshire Renewable Energy Study (LUC, March 2023). The LSA categorizes this proposal (for an 80ha site) as a “very large” solar farm (50-120ha). LCT11: Rolling Clay Lowland, in which the site is located, is assessed as sensitivity level 2 (“high/medium” in descriptive terms), whilst the surrounding LCT15: Greensand Vale, over which much of its visual influence would fall, is assessed as sensitivity level 1 (“high”).

**Figure 2: Typical View across Site and Vale Landscape**



- 4.17 The LVA appears to have de-valued the sensitivity of the site and local landscape to a degree that is supported neither by this review nor by the Renewable Energy Study.

#### Severity of Effects

- 4.18 The process of landscape and visual appraisal derives predicted effects from combinations of receptor sensitivity and degree of impact. Any downgrading of either (or both) of these is therefore likely to result in the under-reporting of effects. In view of the concerns raised above, it is highly likely that this has been the case here.
- 4.19 In relation to the operational landscape effects, the LVA concludes that none would be greater than “Moderate adverse”, which would apply to:

- the agricultural fields;
- overlooking by the chalk scarp; and
- recreational use of the PRowS.

- 4.20 To take the agricultural fields as an example, the operational development would transform them into a solar energy facility (albeit within a substantially intact field pattern). The fields would cease to be primarily agricultural, either functionally or in terms of how they are perceived within the landscape. In addition, this change would result from a “very large” solar farm (as defined in the Renewable Energy Study), and would be experienced over a period of 50 years.
- 4.21 To describe this as “temporary” is to stretch the definition. This period is not short-term, amounting to most of a typical lifetime. GLVIA3 advises that long-term effects might be defined as extending over 10-25 years [GLVIA3 5.51]. At double this period, a 50-year duration might be defined as “very long-term” - or effectively permanent for those who experience the landscape for shorter periods.
- 4.22 Taking these considerations into account, a moderate effect on the agricultural fields seems very much like under-reporting. Even if this level of effect were to be accepted, it suggests that the effect on the application site itself may well be greater – perhaps even “major” adverse, to use the LVA terminology – in view of its defined area and the fact that it consists entirely of agricultural fields. If this were the case, an enhanced severity of effect would be expected to permeate up the landscape hierarchy to the published character types/areas and AONB setting.

## 5. Conclusion

5.1 This review has highlighted a number of important deficiencies in the LVA. Although LVAs are by definition less comprehensive versions of LVIAAs, they are expected to meet comparable standards of robustness. Any such deficiencies should therefore be conscious, rather than resulting from errors of omission, opacity or partiality, which appear to have occurred here.

5.2 In summary, the LVA:

- does not consider Year 1 and residual operational scenarios;
- does not allow the need for/effectiveness of mitigation to be judged;
- does not explicitly assess the effects on all landscape receptors, notably omitting the application site, the published character types/areas and the AONB setting;
- is likely to have under-reported the effects on users of PRoWs within/close to the site;
- has not adequately reported all sources of impact (e.g. site coverage by solar arrays and the impact of the panels and proposed hedgerows on close-range views);
- has not provided any visualizations or illustrations of the development; and
- is likely to have under-reported receptor sensitivity, magnitude of change and thereby the severity of effects, including consideration of their duration.

5.3 The Council is therefore advised not to take the findings of the LVA as read, without obtaining the clarifications and having carried out the technical audit of the visual material, as identified in this review.

5.4 The Council is urged to consider whether the level of harm likely to be caused by the development, over a 50-year lifespan, would be materially greater than has been reported in the LVA, and is consistent with the policy tests applicable to the protection of the countryside, the amenity of its PRoWs, the distinctiveness of its

published landscape types/areas and the setting of the North Wessex Downs AONB.

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**Peter Radmall Associates**  
**Firbank, Ashdown Road**  
**Forest Row, East Sussex RH18 5BW**

