Land West of Bradmore Road and North of Wysall Road Landscape Review

Prepared for: Rushcliffe Borough Council

Date: June 2024

Application Reference: 24/00161/FUL

wynne-williams associates
landscape architects & arboricultural consultants

Land West of Bradmore Road and North of Wysall Road Landscape Review

Contents

Version Control

Version	Author	Changes from previous version	Checked by	Date checked
PL00	LR	None	BB	07/06/2024

1 Introduction

This report has been prepared by Lewis Reynolds, Senior Landscape Architect and reviewed by Robert Browne, Director and Chartered Landscape Architect (CMLI), in response to a brief from Rushcliffe Borough Council.

This report reviews the landscape related documents submitted in support of planning application (Ref. 24/00161/FUL) for the construction, operation and subsequent decommissioning of a renewable energy park comprising ground mounted Solar PV with co-located battery energy storage system (BESS) at the point of connection, together with associated infrastructure, access, landscaping and cabling on Land west of Bradmore Road and north of Wysall Road to the west of Wysall, Nottinghamshire with a total area of 100.95 hectares.

In addition, the report considers whether the landscaping proposals illustrated on the submitted landscape masterplan will be sufficient to mitigate the landscape and visual effects of the development in the long term.

In order to provide an opinion on the proposed development, a site visit was undertaken to make observations on the site character, the visibility of the site and the potential landscape impact of the proposals.

2 Application Documents

The following submitted documents that describe the design, landscape and visual impact, and mitigation of the proposals have been reviewed:

- Planning Statement – Pegasus (February 2024)
- Design and Access Statement – Pegasus (February 2024)
- Agricultural Land Classification Report – Pegasus (January 2024)
- Arboricultural Impact Assessment – Pegasus (January 2024)
- Existing Site Location Plan WLL02A-EXG-00-00-D-K011 Rev. P01 – Pegasus (November 2023)
- Boundaries Plan WLL02A-EXG-00-00-D-K010 Rev. P01 – Exagen (November 2023)
- Boundaries Plan North WLL02A-EXG-00-00-D-K012 Rev. P01 – Pegasus (December 2023)
- Boundaries Plan South WLL02A-EXG-00-00-D-K013 Rev. P01 – Pegasus (December 2023)
- Site Layout Plan WLL02A-EXG-04-00-D-K001 Rev. P04.08 – Exagen (May 2023)
- Site Layout Block Plan with Section and Minimum Buffer Distances WLL02A-EXG-06-00-D-K001 Rev. P02 – Exagen (February 2024)
- Footpath Buffer Distances WLL02A-EXG-04-00-D-K002 Rev. P01 – Exagen (February 2024)
- Landscape Strategy P21-2533_EN_06_D – Pegasus (January 2024)
- Landscape and Visual Impact Assessment P21-2533 – Pegasus (January 2024)
- Willoughby 2 Photomontages P21-2533_EN_10 – Pegasus (January 2022)
- Type 4 Visualisations – The Landmark Practice (March 2024)

3 Proposed Site Layout

Access to the northern parcel would be from Bradmore Road to the east via a newly constructed access road. This new route would be located south of the existing access to Lodge Farm which is a Public Right of Way (Public Footpath Wysall FP4). This access will be created to avoid conflicts with people using the Public Right of Way (PRoW) and people on the road to Lodge Farm.

Access to the the southern parcel would be from Wysall Road to the south, where an existing field access point will be widened to the east to facilitate the proposed junction design. The access tracks would be constructed as an agricultural loose stone track with only the bellmouth and approx. 15m of the access road (from the adjacent public highway) being bound. The tracks will be 4m in width and where necessary turning areas are proposed within the site in addition to passing places.

The proposed solar arrays are indicated to run in an east-to-west direction, in south-facing portrait orientation, in rows of two with one row directly fixed above the other. The rows would be separated by a gap varying between 2.5m and 6.5m to allow for maintenance access. Each panel will sit 0.9m above ground level and measure up to a height of approximately 3.1m

Associated infrastructure shown includes:

- Inverters in the solar arrays with a maximum height of up to 3m.
- Proposed battery storage units would be secured in containers approximately 3m high.
- The proposed on-site substation, the equipment would be between approx. 4-7m in height.
- The battery storage and ancillary facilities (excluding the substation) would be secured by green painted palisade security fencing of 2.5m in height.
- Wooden post and wire mesh ‘deer fencing’ round the solar arrays, with a maximum height of 2.4m.
- The battery storage containers would be painted green, or other colour as agreed with the Council.
- The battery storage units and inverters / transformers would be located in parallel rows to represent a coherent and relatively simple layout demarcated by permeable stone access tracks constructed of locally sourced materials.
- Where access gates are necessary double leaf security gates to match proposed palisade fencing.
- CCTV around the main part of the site, i.e., the perimeter of the battery storage compound.

The proposal also includes details of how the proposed connection route between the northern and southern parcels will incorporate an underground cable route linking the two parcels via the public highway.

The submitted Landscape Strategy includes new woodland blocks and belts, new hedgerows with trees, gapping up and strengthening of existing boundaries. A mixture of grassland is proposed inside and outside the deer fencing enclosures, including substantial areas of wet meadow and wildflower meadow planting. A landscaped buffer (hedgerow and tree planting) is proposed along the Midshires

Way Long Distance Path, which crosses the site's northern parcel. Bunny Old Wood to the north of the site is Ancient Woodland and the proposed layout has incorporated approx. 25m offsets buffer to Ancient Woodlands. I also note the inclusion of a Biodiversity Net Gain Assessment. This indicates that the development will give rise to gains of 80.65% Habitat units and 62.76% Hedgerow units and 14.40% watercourse units.

4 Review of the Submitted Landscape and Visual Impact Assessment (LVIA)

4.1 Methodology and Baseline Assessment

Although the nature of the proposed development means that landscape features such as hedgerows and trees will predominately remain, this doesn't mean that the principle of this form of development will not have an adverse impact on the character of the site, and general sense of place. This is even more pertinent in this location given the potential cumulative landscape and visual impacts created by this and other solar energy development schemes in the local area.

The LVIA submitted with the application considers the landscape effects of the development and the potential visual impact. The report includes a methodology which is generally in line with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3) as prepared by the Landscape Institute (LI) and Institute of Environmental Management and Assessment (IEMA).

It is noted that the LI Technical Guidance Note (TGN) 'Assessing the Value of Landscapes Outside National Designations' 02-21 does not appear to have been referenced within the LVIA. The inclusion of this guidance document would have been good practice as it builds on the details within GLIVIA3 and introduces additional factors that should be considered as part of assessments and demonstrates the importance of the different factors used to determine landscape value.

The report identifies an initial 3km study area, before justifying a reduced scope based on results from preliminary baseline research and a single site visit. This is a reasonable approach. Within the reduced 1-1.5km study area, the LVIA presents a description of baseline character, referencing the necessary precedent landscape character studies at multiple scales.

The viewpoint photography looks generally to be in line with the LI's Technical Guidance Note (TGN) 06/19: 'Visual Representation of Development Proposals'. I note that Type 1 (Annotated Viewpoint Photographs) have been used for the LVIA (dated: January 2024) however, it appears that Type 4 (Photomontage / Photowire - Survey / Scale Verifiable) were also produced in March 2024, but have not been reflected within the LVIA. There is a concern that a proportionate assessment of the potential visual impacts has not been undertaken. I also note a number of graphical inconsistencies between the original photomontages and the Type 4 visualisations.

As acknowledged in the LVIA (Para 6.2) the site visits and photography used to inform the assessment were undertaken in January 2022 and November 2023

when leaf cover and screening are at a minimum and therefore representative of the worst-case scenario. Furthermore, the recent Type 4 verified views were undertaken in February 2024 which is welcomed.

The assessment includes a desktop study, a description of the site and proposals, planning policy review, landscape features and elements, landscape character assessment, visual amenity assessment, and summary and conclusions. The Site's characteristics are reasonably described and the range of views that are available have been appropriately summarised. However, I consider the assessment itself contains a number of inconsistencies, deviates from good practice guidance and underestimates the likely effects of the proposed development on landscape character and visual amenity.

4.2 Landscape Effects

The LVIA (Section 5) has identified the landscape baseline of the site as including National Character Area (NCA) 74: Leicestershire and Nottinghamshire Wolds as defined by Natural England but this has not been assessed as a landscape receptor. GLVIA (Para 5.13) states that "Justification should be provided for any departure from the findings of an existing established LCA". The LVIA (Para 5.4) states that this assessment is "…considered too coarse and geographically too extensive to provide a detailed information that would be relevant to the site and Development". On this basis, it is agreed that the NCA has formed part of the review process of the LVIA however, it should still be noted that the site and surroundings contain a number of the characteristics identified within the relevant NCA Profile document.

The LVIA has however, assessed the Nottinghamshire Wolds Regional Character Area and Draft Policy Zone NW01: Gotham and West Leake Wooded Hills and Scarps, as identified within the Greater Nottingham Landscape Character Assessment, as a landscape receptor.

With regards to the value of landscape receptors, the submitted LVIA offers a description of potential landscape effects that would arise from the development onto the landscape features and elements, including ground cover vegetation, topography, tree and hedgerows, Public Rights of Way, and water features. It is noted that LI TGN 02/21 would have been available at the time of the assessment and sets out a range of factors that is good practice to consider when identifying landscape value in any of the contexts described above.

It is my opinion that the LVIA, as currently presented, fails to provide an assessment for the individual factors in accordance with GLVIA3 and TGN 02/21, and further fails to provide a judgement regarding overall landscape value. GLVIA3 (Para 5.31) emphasises that the "*…assessment of the value attached to the landscape should be carried out within clearly recorded and transparent framework so that decision making is clear*".

Given the impacts of the proposed development and its inconsistency, as a result of the lack of evidence from the baseline study as required by GLVIA3, I consider the judgements of sensitivity are either too low or unclear and should therefore be provided for review. Because of these judgements, there is concern that the landscape receptors' susceptibility, sensitivity, magnitude of change and the

overall significance of landscape effects may also differ from that stated. For example, the LVIA posits that "*The Development would not have any direct physical or residual effects upon any of the PRoWs within the site during its operational stage*", however, it is my opinion in absence of a robust assessment, it is not clear whether the proposals would have direct or residual effects on the aesthetic, recreational or perceptual qualities of the Public Rights of Way or the Long Distance Path particularly as they "*…can be judged on their importance in their own right, including whether or not they can realistically be replaced" and that "They can also be judged on their contribution to the overall character and value of the wider landscape*" (Para 5.30, GLVIA3).

4.3 Visual Effects

Overarching National Policy Statement for Energy (EN-1) 2024 is clear that "*All proposed energy infrastructure is likely to have visual effects for many receptors around proposed sites.*" When considering visual effects of the proposals, the assessment has identified visual receptors within the study area that are likely to have visibility of the proposed solar farm development, as including [but not limited to]: Keyworth Road; Bradmore Road; Public Footpath Rempstone FP8 and Rempstone Lane; Public Footpath Rempstone FP1 (between Rempstone Lane and Wysall), the junction of Rempstone Lane and Wysall Road; Nottingham Road / Bunn Hill Road; Public Footpath Wysall FP3 / Midshires Way Long Distance Path; Public Footpath Costock FP7 and Public Footpath Wysall FP3 / Midshires Way Long Distance Path.

The LVIA provides a broadly sequential assessment of each receptor (Section 6) and the inclusion of separate judgements (Table 2) about the value, susceptibility, sensitivity, magnitude of change and summary of visual effects is appreciated. Upon review, I note that the assessment (Para 7.5) suggests that "*….out of the assessed 8 viewpoints, Viewpoint 3, Viewpoint 5, Viewpoint 7, and Viewpoint 8 would be subject to major adverse effects at Year 1 in winter views only*." The Summary Table – Viewpoint Assessment (Winter Views) however, states there would be Negligible-Neutral effects at Year 1 which conflicts with the later conclusions of the report.

The assessment (Para 6.28) states that:

> "Given the very limited level of inter-visibility and distance, as illustrated by Viewpoint 3, the degree of change and effects are assessed as low at most. Where the visibility of the site increases it is accepted that this may locally increase to medium, resulting in major effects in winter views. It is anticipated that, once the mitigation planting has matured at Year 15, the southern part of the site would be almost completely screened."

However, following my own site visit, it is apparent that the site would experience high levels of intervisibility in the long to medium distance views by people using the Public Rights of Way. For example, Public Footpath Costock FP4 continues from Wysall Lane and Public Footpath Rempston FP8 does not appear to have been assessed within the LVIA which is unfortunate. As the land slopes

considerably north to south, the proposed development will be visible above mitigation planting.

Whilst the LVIA (Para 6.27) suggests that "Views of the central and eastern part would be interrupted by Rough Plantation, Wysall Rough Plantation, and Long Rough Plantation, which would help visually disintegrate the scheme and physically compartmentalise it into smaller areas, which would read as a natural extension to the adjacent approved cumulative solar farm". It is my opinion that although the existing vegetation and proposed mitigation may reduce some visibility to parts of the solar arrays, the loss of longer distance views from the elevated countryside represents a considerable reduction in visual amenity. It also prevents people from appreciating their location within the valley landscape, the enjoyment of recreational activity and the scenic qualities of the undulating hills.

Due to the lack of assessment it is not clear how effective / ineffective mitigation planting will be for people using this route. Whilst I broadly agree with the LVIA (Para 7.5) assessment of **Major Adverse** effects from Wysall Lane and Public Footpath Rempstone FP8 (representative Viewpoint 3) during construction and at Year 1 (winter), I do not believe that it will reduce in the summer nor do I believe that it will reduce to **Negligible** by Year 15. Furthermore, the assessment (Table 2) has identified **Major Adverse** effects for receptors along Costock Road / Wysall Road and the recreational routes along Public Footpath Wysall FP3, Public Footpath Costock FP7 and the Midshires Way Long Distance Path, but likewise I would also disagree that these would reduce to **Negligible** by Year 15.

On review, it has been judged within the LVIA (Para 7.4) that there would be some adverse visual effects however, those that are of most significance, are generally considered to be localised. The LVIA however, clearly illustrates adverse effects would not be restricted to localised areas and these effects would be experienced by people using recreational routes from a number of longer and medium distance areas.

It should also be acknowledged that there will in turn be a change to the view experiences by PRoW users across the network, as well as a change to the perceived sense of place and character because open views would become enclosed and constrained. Therefore, I would judge the adverse impacts to be greater than what is currently judged in the LVIA. In summary, it is my opinion that the submitted LVIA underestimates the predicted level of visual effects. Although proposed mitigation planting will screen parts of the solar panels over time, the prominence of solar arrays and associated infrastructure will be an obvious introduction to the valley landscape and restricts the characteristic views to open countryside.

4.4 Cumulative Effects

The National Policy Statement for Renewable Energy Infrastructure (EN-3) 2024 states that cumulative effects should be included within LVIAs and that "...applicants should consider the cumulative impacts of situating a solar farm in proximity to other energy generating stations and infrastructure."

The LVIA has undertaken a brief assessment of cumulative impacts with four other development sites located within relative proximity to the site, including:

- 22/00303/FUL - Land To North East Of Highfields Farm, Bunny Hill, Costock, Nottinghamshire pertaining to the Construction of a solar farm and battery stations together with all associated works, equipment and necessary infrastructure, together with the formation of a new vehicular access onto Bunny Hill (A60). Approved 16th February 2023
- 21/00703/FUL - OS Field 8561, Rear Of Rushcliffe Grove, East Leake, Nottinghamshire for Installation and operation of a solar farm together with all associated works, equipment and necessary infrastructure. Approved 2nd December 2021.
- 23/00254/FUL - Land At Fields Farm Asher Lane Ruddington, Nottingham regarding Installation of a Renewable energy Park comprising: ground mounted solar panels; access tracks; inverters, transformers; substation and battery energy storage system; customer cabin; underground cables and conduits; perimeter fence; CCTV equipment; temporary construction compound; and associated infrastructure and planting scheme. Approved 2nd October 2023.
- EIA Screening Report was submitted to the Council in June 2023 for a proposed 49.9 MW cumulative solar scheme at Land To The East And South-East Of Costock, Rushcliffe (alternative address: Field Farm, Wysall Road, Costock, Nottinghamshire, LE12 6XQ).

Whilst the acknowledgement of these sites is welcomed, the LVIA does not provide commentary pertaining to the assessment of cumulative landscape effects of the proposed scheme in combination with the other solar farm development. GLVIA3 (Para 7.18) is clear that cumulative assessments can either "…focus primarily on the additional effects of the main project under consideration, or on the combined effects of all the past, present and future proposals together with the new project". In light of GLVIA3, I would have expected the inclusion of proposals at earlier stages of development (including at scoping / screening), particularly where clusters of development are emerging, or where proposals are adjacent to one another. Owing to the relationship, nature, proximity and clustering of these proposals, I consider that the proposals could have additional and combined effects and / or increase the magnitude of change and therefore should have been included within the cumulative assessment.

I also consider that there will be adverse sequential cumulative effects on the local network of PRoWs and promoted walks should the above development be constructed together with the surrounding schemes. I would also expect that a cumulative visual assessment be provided and supported up by cumulative wireframes set beneath photographs and / or photomontages prepared from key viewpoints to illustrate the magnitude of cumulative visual effects (which can also be useful to illustrate the nature and degree of cumulative change to the landscape).

5 Conclusions

This report has been commission to provide an independent assessment of the landscape impact of planning application (Ref. 24/00161/FUL) for the construction, operation and subsequent decommissioning of a renewable energy park comprising ground mounted Solar PV with co-located battery energy storage system (BESS) at the point of connection, together with associated infrastructure, access, landscaping and cabling on Land west of Bradmore Road and north of Wysall Road to the west of Wysall, Nottinghamshire with a total area of 100.95 hectares. The scheme has been examined by reviewing the submitted documents and my own observations of the site and surroundings.

The LVIA submitted with the application considers the landscape effects of the development and the potential visual impact. This assessment includes a methodology which is generally in line with the Guidelines for Landscape and Visual Impact Assessment, Third Edition (GLVIA3). Notwithstanding this, I have raised an important point about the methodology used to assess landscape value, as it is now common practice to use the Landscape Institute's Technical Guidance Note (TGN) 02-21. I have also raised concerns regarding the proportionality of the assessment and that the LVIA does not appear to have been updated following more recent and accurate visual representation of the development proposals.

The LVIA has reviewed National Character Area (NCA) 74: Leicestershire and Nottinghamshire Wolds as defined by Natural England but has not been assessed as a landscape receptor. Whilst the justification provided is acceptable in this instance, it is noted that the site and surroundings exhibit many of the characteristics identified within the NCA Profile document. The LVIA has assessed the Nottinghamshire Wolds Regional Character Area and Draft Policy Zone NW01: Gotham and West Leake Wooded Hills and Scarps as identified within the Greater Nottingham Landscape Character Assessment as a landscape receptor.

With regards to the value of landscape receptors, it is my opinion that the LVIA, as currently presented, fails to provide an assessment for the individual factors in accordance with GLVIA3 and TGN 02/21, and further fails to provide a judgement regarding overall landscape value. Given the impacts of the proposed development and its inconsistency, as a result of the lack of evidence from the baseline study as required by GLVIA3 and TGN 02/21, I also consider the judgements of sensitivity are either too low or unclear and should therefore be provided for review. Because of these judgements, there is concern that the landscape receptors' susceptibility, magnitude of change and the overall significance of landscape effects may also differ from that stated.

There are a number deviations from best practice guidance within the LVIA, for example, it is not clear whether the proposals would have direct or residual effects on the aesthetic, recreational or perceptual qualities of the Public Rights of Way or Long Distance Path particularly as they "…can be judged on their importance in their own right, including whether or not they can realistically be replaced" and that "They can also be judged on their contribution to the overall character and value of the wider landscape" (Para 5.30, GLVIA3).

The LVIA assessment has identified visual receptors within the study area that are likely to have visibility of the proposed solar farm development and provides a

broadly sequential assessment of each receptor (Section 6) and the inclusion of separate judgements (Table 2) about the value, susceptibility, sensitivity, magnitude of change and summary of visual effects is appreciated. Upon review, I noted that the assessment (Para 7.5) suggests that "….out of the assessed 8 viewpoints, Viewpoint 3, Viewpoint 5, Viewpoint 7, and Viewpoint 8 would be subject to major adverse effects at Year 1 in winter views only." The Summary Table – Viewpoint Assessment (Winter Views) however, states there would be Negligible-Neutral effects at Year 1 which conflicts with the later conclusions of the report.

Following my own site visit, it is apparent that the site would experience high levels of intervisibility in the long to medium distance views by people using the Public Rights of Way. For example, Public Footpath Costock FP4 which continues from Wysall Lane and adjacent to Public Footpath Rempston FP8 does not appear to have been assessed within the LVIA. As the land slopes considerably north to south, the proposed development will be visible above mitigation planting. It is my opinion that the although the existing vegetation and proposed mitigation may reduce some visibility to the lower parts of the solar arrays, the loss of longer distance views from the elevated countryside represents a considerable reduction in visual amenity. It also prevents people from appreciating their location within the valley landscape, the enjoyment of recreational activity and the scenic qualities of the undulating hills.

Due to the lack of robust assessment it is not clear how effective / ineffective mitigation planting will be for people using this route. Whilst I broadly agree with the LVIA (Para 7.5) assessment of **Major Adverse** effects. I do not believe that these will reduce in the summer nor do I believe that they will reduce to **Negligible** by Year 15. Furthermore, the assessment (Table 2) has identified **Major Adverse** effects for receptors along Costock Road / Wysall Road and the recreational routes along Public Footpath Wysall FP3, Public Footpath Costock FP7 and the Midshires Way Long Distance Path, but I would also disagree that these would reduce to **Negligible** by Year 15.

Whilst the LVIA acknowledges there will be adverse visual effects, it contends that those that are of most significance, are generally considered to be localised. The representative viewpoints (and those omitted) clearly illustrates however, that adverse effects would not be restricted to localised areas and these effects would be experienced and felt by people using recreational routes and public footpaths from a number of longer and medium distance areas in the wider countryside. The prominence of solar arrays and associated infrastructure will be an obvious introduction to the undulating valley landscape and further restricts the characteristic long views to open rural countryside.

Whilst the acknowledgement of neighbouring solar development sites is welcomed, the LVIA does not provide commentary pertaining to the assessment of cumulative landscape effects of the proposed scheme in combination with the other solar farm development. I would have also expected the inclusion of proposals at earlier stages of development (including at scoping / screening), particularly where clusters of development are emerging, or where proposals are adjacent to one another. Owing to the relationship, nature, proximity and clustering of these proposals, I consider that the proposals could have additional

and combined effects and / or increase the magnitude of change and therefore should have been included within a robust cumulative assessment.

I also consider that there will be adverse sequential cumulative effects on people using the network of PRoWs and Long Distance Path should the above development be constructed together with the surrounding schemes. I would also expect that a cumulative visual assessment be provided and supported up by cumulative wireframes set beneath photographs and / or photomontages prepared from key viewpoints to illustrate the magnitude of cumulative visual effects (which can also be useful to illustrate the nature and degree of cumulative change to the landscape).

6 Appendices

6.1 Appendix A – Viewpoint Photo

Photo A – View from Public Footpath Costock FP4, looking north towards the site and Bunny Old Wood

wynne-williams associates
landscape architects & arboricultural consultants

2 Threshelfords Business Park, Inworth Road, Feering, Colchester, CO5 9SE
01376 573050 / enquiries@w-wa.co.uk / www.w-wa.co.uk