

Wiltshire Council Planning Consultation Response

LANDSCAPE

Officer name: Mark Goodwin CMLI (Senior Landscape Officer)

Date: 24.03.2026

Application No: PL/2025/05830

Proposal: The construction and operation (including maintenance) of a 49.9MW solar farm to include ground mounted solar photovoltaic (PV) arrays, electrical substations, grid balancing infrastructure, cabling, BESS (49.9MW capacity), communications tower, other associated infrastructure and areas for biodiversity net gain (BNG) enhancement and landscape mitigation.

Site Address: Land at Flaxlands Farm, Near Flaxlands Lane, Royal Wootton Bassett, Swindon, SN4 8DY.

Case Officer: Oliver Phippen

Background

Comprehensive pre-application landscape planning advice was provided to the LPA / applicant dated 12.08.2024 under application reference ENQ/2024/01008, this was based on the pre-application information submitted at that time.

Further pre-application landscape officer feedback in relation to LVA/LVIA matters was offered during the course of a follow up meeting with the applicant's landscape consultant.

The following response considers all relevant submitted information that accompanies this full planning application uploaded onto Wiltshire Councils planning web site pages, up to and including the date of this consultation response.

A 'Landscape and Visual Appraisal', prepared by AECOM accompanies this full planning application.

Matters Considered:

Landscape and visual matters, including;

- Relevant Planning Policy, Planning Guidance and Statutory Legislation
- Landscape Designations
- Landscape Character
- Landscape Features
- Public Visual Amenity
- Potential landscape and visual effects and cumulative landscape and visual effects
- Landscape Strategy
- Other material planning considerations.

National Planning Policy (NPPF) 2024 (as amended Feb 2025) and Planning Practice Guidance (PPG)

The NPPF sets out the government's planning policies for England and provides guidance on how these should be applied. It has a strong emphasis on sustainable development, with a presumption in favour of such development. It sets out requirements for planning policies and decisions to ensure developments are well designed, including through appropriate landscape design, are sympathetic to the local character and landscape setting, and create or maintain a strong sense of place. The

NPPF contains statements which are relevant to conserving and enhancing the natural environment and the assessment/appraisal of impacts.

Paragraph 187 is relevant to the consideration of this application and states:

“Planning policies and decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*

Development Plan Policies;

Wiltshire Core Strategy (2015)

- Core Policy 42: Standalone renewable energy installations
- Core Policy 51: Landscape
- Core Policy 52: Green Infrastructure
- Core Policy 57: (Landscape Design, local character place shaping aspects)

North Wiltshire Local Plan (2011) Saved Policies

- Core Policy NE12: Woodlands
- Core Policy NE14: Trees, Site Features, and the Control of new development.

Statutory legislation

- Countryside and Rights of Way Act 2000 (CRoW Act 2000) – Section 85: Duty to seek to further the statutory purpose of National Landscapes.
- Levelling Up and Regeneration Act 2023 (LURA 2023) Section 245: Protected Landscapes.

Landscape Designations

The application site is not located within a nationally or locally protected Landscape. The defining scarp slope (rising to Circa 200m AOD) forming the edge of the **‘North Wessex Downs National Landscape (Area of Outstanding Natural Beauty)’** lies approximately 6km to the southeast of the site at its nearest point. There are a number of surviving pockets of deciduous **‘Ancient Woodland’** that border and lie in proximity to the site. These are identified to include, Morris’s Copse, Frith Copse, Flaxlands Wood, Cowleaze Copse and Midgehall Copse. Ancient Woodland and ancient and veteran trees have recognised value and are afforded specific planning protection.

The site is included within the extents of the **‘Great Western Community Forest’** Plan Area (WCS, Core Policy 52: Green Infrastructure) and it also lies within the identified limits of **‘Braydon Forest’** a former Royal Hunting Forest (NWDLP, Core Policy NE12: Woodlands). The site also lies within the large area identified as a new national forest **‘The Western Forest’**.

The Great Western Community Forest initiative seeks to repair countryside and enhance a sustainable urban/rural transition between Swindon and adjoining countryside through increased tree / woodland planting whilst also protecting the individual identity and landscape settings of small rural outlying villages, hamlets and farmsteads. It also encourages and promotes improved opportunities for public recreational access to countryside and creating opportunities for education and rural enterprise. While the creation of the new national ‘Western Forest,’ seeks to support aims

of transition to net zero, Local Nature Recovery, improved public access and flood mitigation and diversified rural economies, through:

- The planting of 20 million trees by 2050.
- create at least 2,500 hectares of new woodland by 2030.
- bring 1,500 hectares of existing woodland into better management.
- 73% of the area is farmland, with a strong emphasis on: Agroforestry, Farm Woodlands and hedgerows and shelterbelts.

As such, retaining, protecting existing trees and woodlands and improving their management alongside appropriate new tree planting and woodland creation as part of any new development proposal, should be viewed as a clear environmental opportunity and material planning consideration for this application.

Landscape Features

As well as the existing numerous **mature deciduous ancient and semi-ancient woodlands and copses** that adjoin the application site areas, important **neutral grassland priority habitat** extends over much of the southern site area south of Flaxlands Lane including a small field to the north of the site, all of which are included within **Flaxlands Manor - County Wildlife Site**. The site appears to comprise a mix of irregular and rectilinear field enclosure. **Native hedgerows with many fine mature hedgerow oaks** are important landscape components contributing interest and value to the local character of this area and provide important green infrastructure links and wildlife corridors and foraging habitat between dispersed remnant areas of **ancient woodland**.

A number of **small ponds** also appear to be distributed throughout the application site. The elevated topography of the local area functions as a water shed catchment boundary, with field drains to the south of Flaxlands Lane running south-west to feed Woodbridge Brook (which joins the River Avon at Cowbridge Malmesbury), while north of Flaxlands Lane the field drains and small running watercourse feeds into The River Key (which joins the River Thames (or Isis) at Cricklade to the north-east).

The **locally elevated topography** of the site facilitates some southern **panoramic views** over the M4 motorway over and between upper field boundary vegetation. and across the lower clay vale leading towards the **elevated rising western scarp slopes of the North Wessex Downs National Landscape** located circa. 6km to the southeast of the site. Views of the motorway from the site are largely screened by the intervening rolling topography and lower southern slope field boundary and motorway edge vegetation and Morris's Copse, although these panoramic views are diminished slightly by an intervening overhead electricity line and pylons which pass through the southwest of the site viewed in the foreground. There are also long-distance views to the north from Flaxlands Lane and from footpaths on higher elevation of **wooded horizon lines** at Green Hill and Purton and Minety extending in the far distance all the way to the Cotswolds. These views are glimpsed through gaps in woodland and over and through gaps in northern upper field boundary vegetation.

Landscape Character

The site area/s are identified to fall within the following landscape Types and Landscape Character Areas within the available hierarchy of published Landscape Character Assessments;

National Character Area Profiles - Natural England (Scale 1:250,000)
(Whole site area)

- **108 Upper Thames Clay Vales**

Wiltshire Landscape Character Assessment - Land Use Consultants (2005) Scale **1:50,000**
(Northwest of site area)

- Landscape **Type – 11: Rolling Clay Lowland**
- Landscape **Character Area – 11B: Minety Rolling Clay lowland**

(Majority of site area)

- Landscape **Type – 8: Limestone Ridge**
- Landscape **Character Area – 8A: Swindon-Lyneham Limestone Ridge**

North Wiltshire Landscape Character Assessment – White Consultants Ltd. (2004) Scale **1:25,000**
(Northwest of site area)

- Landscape **Type - Lowland Clay Woodland**
- Landscape **Character Area – 4: Braydon Wooded Plateau**

(Majority of site area)

- Landscape **Type – Urban Fringe Scarp**
- Landscape **Character Area – 3: Swindon Fringe**

Site character and local context

The site associates most closely with the elevated Limestone Ridge which is a belt of Coral Rag formation limestone hills that extends from Lyneham in the south to Swindon in the north emerging from the lower clay vales. The majority of the central, southern and eastern site areas fall into the Limestone Ridge and Urban Fringe Landscape Types (Wiltshire 1:50,000 & North Wiltshire 1:25,000 Landscape Character Assessments). The remainder of the site (northwest) falls away into the lower Rolling Clay Lowland and Lowland Clay Woodland Types (1:50,000 & 1:25,000 Wiltshire and North Wiltshire Landscape Character Assessments).

The site area comprises part of a local rolling hill feature which is also the highest point along the limestone ridge in this locality, with development proposed on parts of the hilltop plateau and extending up the upper western, northern and southern hillside pastoral fields. The site varies in level from circa. 107m AOD in the far southwest corner, close to Flaxlands Wood rising up to 155m AOD at the highest central eastern part of the site, close to Flaxlands Reservoir (covered).

Existing land use and landcover appears to be primarily pastoral farming/grass cropping. There is an existing National Grid electricity distribution hub that lies to the west of Flaxlands Wood, and a high voltage electricity transmission line crosses the southern parts of the application site to connect to it. Also notable on the horizon is an existing telecommunications tower located on the northern edge of Frith Copse which rises above the mature treed skyline backdrop provided by this ancient woodland and a smaller communications tower is also located just to the east of the covered reservoir.

A public road (Flaxlands Lane) passes through the application site area, this is a rural narrow single width public rural road providing access to the farmsteads, cottages and other properties dispersed along its length. The M4 Motorway lies approx. 500metres to the south of the site at its nearest point. It is understood that the construction access is being proposed to be taken from the eastern end of Flaxlands Lane and that a number of temporary HGV passing places will be required to facilitate the construction of this solar PV and BESS scheme.

The small settlement of Hook lies to the east of the application site separated from it by a single field. This area is sparsely settled with the notable exception of the continued urban creep and development pressures from the much larger urban conurbation of Swindon pressing westwards from the east, and the expanding Market Town of Royal Wootton Bassett pushing northwards from the south while linear ribbon development extends north of Hook along Restrop Road towards Purton.

Public Visual Amenity

There are a number of existing local rural Public Rights of Way which will be either physically impacted by the development proposal itself, or the users of these routes will experience some obvious adverse visual and perceptual change effects from the existing baseline scenario. At pre-application stage I identified the following local Public Rights of Way (PRoW) as being relevant to consider (scope in/out of assessment) as representative visual receptors within the LVA.

Passing through and along the edges of the application land

LTRE26 (Footpath); LTRE27 (Footpath); LTRE28 (Footpath); LTRE29 (Footpath); LTRE30 (Footpath); LTRE31 (Footpath & Bridleway sections); LTRE52 (Footpath); LMIL13 (Footpath); LMIL30 (Footpath).

South of the application land

LTRE27 (Footpath); LTRE29 (Footpath); LTRE31 (Bridleway).

North of the application land

LTRE24A (Footpath); LTRE25 (Footpath); LTRE26 (Footpath); LMIL4 (Footpath); LMIL7 (Footpath); LMIL8 (Footpath); LMIL10 (Footpath); LMIL13 (Footpath).

I note the applicant's record of a pre-application meeting (18.11.2024) with myself, included within table 1.3, pages 5-6 within the submitted LVA. During this meeting representative visual receptors and viewpoint locations were discussed and largely agreed acknowledging that these final locations would be subject to final ground truthing on site by the landscape professional carrying out the LVA assessment on behalf of the applicant.

In relation to the proposed relocation of footpath routes LTRE26 & LTRE28 (LVA, page 7), the applicant notes that I was receptive in principle to the relocation of existing footpath routes, if they contribute to the landscape legacy of the project. What I recall saying is that the assessed amenity value of any proposed diverted route should aim to provide a similar or improved public amenity value as the existing route alignment for its users.

I understand from the applicant's submission that these relocated PRoW are proposed to be diverted under Section 257 of the Town and Country Planning Act 1990, a process which will likely take place parallel to the determination of this planning application, and that this will involve the permanent diversion of sections of PRoW LTRE 28 and LTRE 26 where these pass through the site, south of Flaxlands Lane. I do not raise concern with the proposed partial relocations of PRoW LTRE28 or LTRE26 in landscape or visual terms as they are relatively short in length and will provide a similar or slightly improved amenity proposition to maintaining these on their current route alignments through a proposed solar panel field.

The proposed replacement of existing poor-quality stiles at entrances and crossing field boundaries with kissing gates is a welcomed and supported public access improvement.

At pre-application stage, two areas of designated public **open access land** (CRoW Act 2000) were identified to include Webbs Wood which lies approx. 600m to the west of the site and Lydiard Plain which lies approx. 200m from the northwestern edge of the site. The Webbs Wood access land is managed woodland, the public users of this open access land are unlikely to experience views of the site or development proposal, but partial views, and filtered winter views of the elevated plateaux and upper northern and western field areas are achievable viewed between the established woodland blocks from Lydiard Plain & B4696 approaching from the northwest and from B4042 (Malmesbury Road) approaching from the west.

The potential for shared Intervisibility between the site and **Lydiard Park** / (Grade II) Registered Historic Park (west of the site) was considered as unlikely at pre-application stage, due to the likely screening provided by Park Copse located at the western end of Lydiard Park, and woodland bordering the eastern edge of the application site, but due to the elevated nature of the proposed development site, I requested that users of this receptor should be assessed within the scope of the LVA. I can confirm this has been considered within the submitted LVA which confirms there will be no potential for shared intervisibility between site areas/development and Lydiard Park.

Comments and observations

Wiltshire Core Strategy (underline my emphasis)

Core Policy 42: Standalone renewable energy installations

6.39 *"The development of most standalone renewable energy installations within Wiltshire will require careful consideration due to their potential visual and landscape impacts, especially in designated or sensitive landscapes, including AONB's and the Stonehenge and Avebury World Heritage Site, and their setting. Core Policies 51 and 59, which relate to landscape and the World Heritage site, should be considered alongside this policy. The size, location and design of renewable energy schemes should be informed by a landscape character assessment, alongside other key environmental issues as set out in Core Policy 42. This should help reduce the potential for conflict and delay when determining planning applications. Cumulative effects should be addressed as appropriate."*

Core Policy 42 (i) The Landscape, particularly in and around AONB's (National Landscapes).

Under criterion i) Within pre-application advice, the potential effects arising from development upon the setting to the North Wessex Downs AONB (National Landscape) was requested to be included within the LVA. I formed an initial opinion that the potential for significant adverse visual effects to impact the setting to the North Wessex Downs National Landscape was either very low or unlikely, but this needed to be tested and confirmed through visual assessment. This would assist Wiltshire Council as a 'relevant authority' under section 85 of the 'Countryside and Rights of Way Act 2000' (CRoW Act 2000) - as amended, to demonstrate it has considered the statutory purpose and function of the AONB designation, including consideration of effects with potential to impact upon its setting whilst carrying out its statutory function as Local Planning Authority.

As requested, the applicant has subsequently included a specific representative photo viewpoint 10 **(VP10)** located outside the LVA's general 3km study area. The inclusion of this long-distance viewpoint is helpful and appreciated. The viewpoint is taken from an elevated vantage point just southeast of the village of Broad Town from a representative open elevated location on the White Horse Trail circa 6km southeast from the site. The trail follows the western edge of the meandering

scarp slope which denotes an abrupt change in topography and geology and denotes the western boundary limits of the North Wessex Downs National Landscape (AONB).

VP10 illustrates the nature of these long and expansive panoramic views looking west and northwest across the lower clay vale landscape, towards the gently rising limestone ridge and the site. The site itself sits on the plateaux and upper slopes of a shallow rolling hill feature and local topographical highpoint along the limestone ridge, just north of the M4 motorway, and northwest of the small village of Hook.

The view illustrates that some higher south facing fields areas on this shallow rolling hill feature will just about be discernible as a very small overall visual component of the view, set amongst framing and backdrop woodland within a vast panoramic countryside scene with the settlement of Royal Wootton Bassett in the intervening middle distance. The removal of the central southern field as a proposed panel area (revised concept drawing) seeking to address raised ecology concerns, also reduces the visual presence of solar panel field areas on these upper south facing slopes. This, in combination with the viewing distance at circa 6km, leads me to conclude that the setting to the NWD's National Landscape will not be harmfully impacted by the proposed development.

In this regard WCS, CP42 criterion (i), alongside WCS, CP51 criterion (ix) insofar as these specifically relate to National Landscapes (AONB and the World Heritage Site) have been considered within the application and WC's statutory duty as a 'relevant authority' under section 85 of CRow Act 2000 (as amended) can be reasonably demonstrated. For further clarity, I do not consider it necessary for the application to demonstrate how the development seeks to further the statutory purpose of these designations.

Core Policy 51: Landscape

Core Policy 51 seeks to ensure that new development proposals protect, conserve and where possible enhance landscape character. New development must not have a harmful impact upon landscape character. The policy is clear that any negative effects arising from new development must be mitigated as far as possible through sensitive design and landscape measures. Proposals should be informed by and sympathetic to the distinctive character areas identified in the relevant Landscape Character Assessment(s) and any other relevant assessments and studies.

Within pre-application landscape planning advice offered to the applicant, I clearly conveyed that this application site was a far from ideal location for a large-scale solar farm development, largely due to the selected site location on an elevated rolling hill feature, and highlighted the following landscape policy considerations to be appropriate for the LVA/LVIA to include within its assessment as follows;

Under criterion (i) The potential for the development to impact upon existing important or valued landscape features. In this regard appropriate retention, protection, enhancement and reinforcement of important natural landscape features was identified to be necessary to comply with CP51, criterion (i) and also to comply with the Saved North Wiltshire District Local Plan Policies (Core Policy- NE12: Woodland & Core Policy NE14: Trees, natural features and the control of new development) which still form part of the Development Plan.

In this regard I note the proposals proposed 30m standoff buffers to areas of adjoining ancient woodland, 15m buffers to other woodland and tree groups, 10m buffers to existing hedgerows and specific root protection areas for existing retained trees, 10m standoffs to watercourses, ditches and ponds, all of which is welcomed. Also noted is the removal from the scheme of some originally proposed panel fields areas due to presence and retention of priority grassland habitat. While many

important landscape features can be retained within the development proposal, the relationships between and perceptual value of these features will likely diminish in character terms, as they will be incorporated into, or viewed in the foreground / background context of the new solar farm and BESS infrastructure.

Under criterion (ii) The potential for development of this scale and nature to impact upon the rural character and visual setting of existing rural settlement and potential for harmful urbanising coalescence with larger settlements through introduction of urban industrialising in-fill development into existing countryside valued for its separating function.

I do not consider that this development would contribute to the well documented and increasing urban settlement coalescence pressures that exist between Royal Wootton Bassett and Swindon, and between Swindon/Royal Wootton Bassett and their outlying small rural hinterland settlements. The local rural character of the site and its adjoining context will however notably and obviously change due to the contrasting nature and scale of the development being proposed when assessed against the rural and largely intact baseline characteristics of the site and local area.

Under criterion (iv) The potential of likely change effects resulting from the introduction of new large-scale urbanising straight horizontal and vertical elements (e.g. solar panel strings, communications tower, security fencing, lighting and camera poles, substation and BESS components) location and massing of containers and buildings / structures impacting upon the elevated local rolling ridge and skyline.

Also highlighted as a specific issue was a request for proposals to detail how resulting waste soils would be dealt with, i.e. how and where would they be stored on site for their eventual re-use for farmland restoration at decommissioning / end of project life. I can find no information within the application submissions relating to this specific matter. While detailed soil management may be considered by the applicant as suitable to be handled by means of a planning condition, I seek further clarity of the approach to be taken, given the ecological value and constraints within and bordering the site. This should clarify what the applicant's intention is for dealing with waste sub soil and topsoil excavated and stripped to create surfaced access tracks, BESS and substation Compounds. There are currently no areas identified for soil storage on any submitted plans. I am becoming increasingly concerned by these types of applications (Large commercial Solar PV and BESS) simply disposing of excess soils to the host farmer/landowner for private use or even selling it, thereby removing all future possibility of re-use in farmland restoration at the end of stated operational life spans. It is not unreasonable for the LPA to seek further clarification on this specific matter prior to determination. This should not simply be left to the installing contractor to decide.

Under criterion (vi) At pre-application stage I advised that existing rural views from the wider landscape experienced by visual receptors (including from rural roads) with views to, from and over the site/proposed development or parts of the site/proposed development should include representative close, medium and long-distance views. The potential visual change effects resulting from the changed rural / agricultural land use to a new urbanising land use should be included within the scope of visual assessment (worst case scenario, wintertime views) for agreed representative visual receptors.

The application is accompanied by a Landscape and Visual Appraisal prepared by AECOM. The LVA includes an assessment of the likely visual effects experienced by representative visual receptors of the proposed development (discussed later).

Under criterion (ix) At pre-application stage I advised that the site itself should be assessed in terms of its contribution and function to the setting of the North Wessex Downs AONB.

I can confirm that in my opinion the application has adequately and proportionately considered the potential for resulting effects upon the setting of the NWD's National Landscape, see earlier comments for WCS, CP42 (i). The conclusion is that no harm arises.

Site selection and general principle of development

I expressed concern within my pre-application landscape response in relation to the general suitability of the proposed site for the development of a large-scale commercial ground mounted solar PV array, largely due to the locally elevated nature of the site positioned on a rolling plateau and upper slopes of a local hill feature and topographical highpoint along the Limestone Ridge.

The site and locality have some valued landscape components and features, and the landscape appears to be generally in good condition, with a reasonably dense local network of PROW some offering the potential for some elevated long-distance views over countryside both north and south towards the rising edges of National Landscapes on distant horizon lines.

I note within the revised concept plan that two south facing fields and one north facing field have been removed as proposed panel areas. I understand the reason for this is to address ecological concerns raised in relation to Flaxlands Manor County Wildlife Site and its associated priority habitat neutral grassland. I also note further removal of the initially proposed panel field area located north of Flaxlands Cottage to the west of the scheme.

The revised concept plan illustrates that the majority of panel areas are proposed to the north of Flaxlands Lane, on the upper plateau areas and upper north and west facing hillside slopes, the gradients of which do appear steep and uneven in places (as illustrated by LVA photo **VP5**). Bearing this in mind, I highlight the content of the submitted Planning, Design & Access Statement, in particular **Section 4.2- Requirements for site selection** (see below, underline my emphasis).

"4.2.4 Further to this, the Applicant identified 'inclusionary' requirements relating to the size of operational land and orientation of the Site to facilitate the successful construction and operation of a solar farm of the scale and nature proposed. These requirements included: – A minimum area of 60 ha – to facilitate a 49.9 MW solar farm, a site must be at least 60 ha, ideally 80 ha in order to deliver a viable solar farm that achieves sufficient output in electricity generated to justify the cost of the grid connection, construction and long-term operational costs and that is able to enhance, protect and mitigate environmental and planning constraints within the Site and Study Area (2 km area surrounding the Site boundary)."

"4.2.5 Generally flat topography or south-facing slopes – viability in terms of electricity generated is greatly affected by topography, with north-facing slopes requiring significantly larger land area to generate the same output. North, east, or west orientating land parcels are not optimal for solar panels to absorb the maximum quantity of sunlight and are therefore not preferred. Also, the frames for solar panels are difficult to construct and maintain on steep slopes, with very limited options in terms of construction contractors, procuring the right designs / equipment, and ability to ensure such projects during operation due to maintenance, rendering such sites non-viable."

Considering the applicants stated site selection criteria, I highlight the steep topography and northern and western aspects of the sites sloping field parcels seemingly conflict with preferred slope and panel orientation, present practical challenges at construction stage and for ongoing maintenance with potential to impact on the scheme's overall viability and or renewable energy outputs.

Comments on design and layout proposals

The current landscape masterplan as incorporated within the LVA is obviously not based on the latest revised concept layout and will need to be revised to align.

Because southern facing panel frame orientation is working against natural land gradients within the northern and western field parcels, I highlight that this is likely to result in a requirement for slightly higher than stated 3m maximum heights between top of panels and adjacent ground levels.

I further highlight that the proposed substation and battery storage facility is likely to require some kind of supporting / retaining wall along its northern edge to provide a level area to support this infrastructure, this is because land gradients cross fall circa. 5-10m in height across the proposed BESS and substation site.

Similar concerns are raised over the practicality of constructing the internal access tracks, in particular north of Flaxlands Field Farm and The Shepards Rest. The fields to the north and west exhibit a series of shallow, parallel linear undulations consistent with possible relict ridge-and-furrow cultivation or possibly historic shallow cultivation terraces (unless there is a more modern explanation for these landform features), with a level difference across the northern and western slopes of circa 25-30 Metres.

Comments on Landscape and Visual Appraisal

Landscape effects

Following careful review, I find myself disagreeing with the LVA's assessed landscape effects for the proposed development and question **the LVA's conclusions** as summarised at Section 8, Page 55, Paras, 8.1.1 & 8.1.2, which states in relation to overall assessment of landscape character (underline my emphasis)

"Para 8.1.1, "The introduction of the Proposed Development into LCA 3 - Swindon Fringe and LCA 4 – Wooded Plateau will increase the prevalence of electricity infrastructure in these landscape character areas (refer to Figure 7B, Appendix B for their location). The Importance of landscape effects is considered Minor Adverse. The Proposed Development is not uncharacteristic when considering other existing solar farms located within the same LCA and adjoining LCA's."

Firstly 'the importance of landscape effects' is a separate matter for the decision maker in final planning balance; I believe the assessor has used the term 'importance' as a substitute for 'significance' of effects which is required for assessment of EIA development. The LVA should concern itself with establishing the degree and nature of change from the condition and strength of character of the existing landscape baseline of the site and its landscape context, using the hierarchy of available published landscape character assessments to assist with this process.

What the reader/reviewer of the LVA seeks to understand is whether the site and its adjoining context, is representative of the character area/s descriptions of distinctiveness or locally varies in some way / contains important or rare features, exhibits strong or weak characteristics or associations to inform value and susceptibility judgements.

Secondly, *“The proposed development is not uncharacteristic when considering other existing solar farms located within the same LCA and adjoining LCA’s.”* In this regard the LVA appears to conclude that because existing commercial solar farm use is already present in the same Landscape Character Areas (LCA’s), any additional location for a large scale solar PV and BESS within the same Landscape Character Area or adjoining LCA should be accepted as a characteristic addition, regardless of the condition or strength of character of the receiving landscape. The whole point of the assessment is to understand the specific value of the site and its adjoining and wider context and identify any sensitivities (and/or opportunities) relevant to the nature and scale of development being proposed.

The conclusion continues at para 8.1.2...

Para, 8.1.2, *“Nevertheless, the Proposed Development would introduce a change in land use from farmland to a solar energy facility, with solar panels forming a new feature within the landscape locally. While this results in a noticeable change in the view—particularly a reduction in perceived openness—the existing field pattern would be retained. Additionally, the change in character would be visible only from a limited number of viewpoints within the 3km Study Area, limiting its overall impact on the landscape character.*

In relation to *‘visible only from a limited number of viewpoints.’* The first point is that visual effects are assessed separately through visual assessment. The second is that this concluding statement gives a false impression of likely available views, as only a limited number of viewpoints were included for a proportionate assessment on the basis that these were representative of visual receptors and potential views, as the theoretical number of viewpoints with potential for some shared visibility with site areas and/or introduced development could be quite large, if every public receptor within the 3km study area, (as identified with potential for views within the screened theoretical Zone of intervisibility map) were to be assessed on worst case scenario (winter) basis. The landscape assessment should focus on the landscape as a resource, its distinctive fabric components, and the interactions of these components, including perceptual aspects such as relative tranquillity, time depth qualities, and sense of place etc. accepting that visibility and views are assessed separately and while important and often linked, are not the driving force underpinning conclusions on landscape character change.

Further difference of opinion relates to the applied methodology criteria scale used within the assessment, alongside a few inconsistencies of judgement over existing landscape value and susceptibility to the nature and scale of change. The site’s elevated location on a rolling hilltop feature and highpoint along the limestone ridge has received cursory consideration and resulting effects are understated. In my opinion the sensitivity levels used within the assessment are understated.

The LVA’s actual assessment of landscape character is quite unusual as it seems to focus on the value of landscape character areas included within published hierarchy of landscape character assessments that fall within the LVA 3 km study area (plus additional considerations outside the 3km study area to capture the North Wessex Downs AONB setting). While the assessment does

describe the physical components which collectively comprise to define the character of the site and its adjoining context to establish a local landscape baseline, the LVA doesn't include an assessment of the resulting landscape change effects arising from the addition of the development against this landscape baseline position.

The LVA considers landscape value at section 4, As well as the usual indicators of value i.e. formal designations, it also assesses the value of each landscape character area, presumably to inform overall sensitivity levels in assessed judgements. I've not encountered this approach before whilst reviewing LVA/LVIA reports, i.e. in terms of seeking to establish the comparative landscape value of individual landscape character areas. This approach essentially seeks to establish the value of the landscape resource at a landscape character area basis. This approach is slightly misguided in my opinion, as landscape character areas are distinctively different from each other, with no one character area being of higher value than another, they are simply different. The approach is viewed to be at odds with the principles of landscape character assessment.

A further observation is that the landscape value criteria used for assessment of the majority 'Swindon Fringe' host landscape character area has been ascribed a '**low**' value classification for which the typical description is for '**A landscape with elements of community designation and/or few positive characteristics.**'

I disagree with the low value classification used within the assessment of baseline character for the Swindon Fringe in the context of the application site, I consider the site and its context exhibit similarities and associations with the criteria description for **Medium** value classification, i.e. '**A landscape with elements of local or neighbourhood designation/ importance and/ or a landscape with some positive characteristics and/or distinctive features.**'

There are many more observations I could make in relation to the LVA, but generally I consider the LVA hasn't robustly identified local value or appropriately assessed the nature of landscape change effects arising from the proposed development upon the receiving landscape character at a local level.

Visual effects

A total of 10 representative viewpoints were taken forward for assessment and the views recorded as part of the visual appraisal. The extent to which the Proposed Development would give rise to change in the existing views is considered, as set out in LVA Tables 6-2 to 6-16.

A number of moderate adverse change effects are recorded for construction, operation year 1 & year 15.

Similarly, the baseline value of assessed views that have been included for assessment have been generally ascribed a **low** value classification i.e. '**Views of relatively common landscape elements, likely to be valued by the communities which experience the view**'. My first impression of the sites areas and the amenity value afforded by the local public rights of way and local road network would not lead me to conclude the receiving site areas are representative of a low value landscape with low value views. Again, I do not consider the correct value classification has been used within the baseline assessment of viewpoints. A medium value classification is better suited in most instances, rather than low value.

Effectiveness of mitigation

While the LVA identifies a number of moderate adverse visual effects following the insertion of the development proposal, the assessment accepts that not all resulting effects are possible to effectively visually screen with mitigation planting or by managing existing hedgerows at greater height.

The existing hedgerows along Flaxlands Lane are thin and gappy in many places especially during winter months. Views south from Flaxlands Lane as illustrated by **VP2** currently includes a rising rolling pastoral skyline hillcrest/ridgeline viewed through field gateways and over low maintained hedgerows which will be replaced by views of solar panels rolling over the crowning plateaux topography on the skyline. Simply allowing this existing hedge line to grow taller will not provide an effective screening function in my opinion, especially during winter months. These hedge lines could be substantially strengthened behind, with a new connecting structured woodland belt to thicken and improve screening functions while also delivering green infrastructure, landscape, and ecology enhancement through new connecting linear woodland to provide links between existing isolated areas of local woodland.

Views northeast from public footpath/s located south and west of Koffs Farm, as represented by **VP5**, currently includes views of steeper rising hillside pastoral fields, enclosed by low hedgerows with views of ancient woodland and low hedgerows visible on the skyline, with boundary hedgerows and two modest scale farm buildings, alongside Flaxlands Field Farm located on the edge of the plateaux in the middle distance. These views will be substantially changed following the insertion of Solar PV panels, Sub-station and BESS. The solar panels located on the upper slopes will result in some new urban skyline effects viewed from lower-level vantage points. These change effects will remain for the life of development as no mitigating screen planting is currently being proposed. I believe that tree planting in the form of a structured woodland belt extending along the northern field boundary would provide some useful screening to the open views of rising rows of rear solar panel strings and supporting frames.

Following removal of the two solar panel fields areas south of Flaxlands Lane there would be some merit in further considering whether the alignment of the surfaced maintenance access track to southern field parcels might now be better relocated to the east of this field, closer to the reservoir access track and reservoir.

Other material planning considerations pertaining to landscape and visual matters

National Highways – Glint and Glare (National Highways Planning Response (NHPR 25-01) January 2025)

Whilst reviewing the application submission I have read the comments submitted by National Highways in relation to some concerns over glint and glare from solar panel areas located within the two southeasternmost field units with potential to impact safety of road users over a relative short section of the M4 Motorway, further noting the advised condition they deem necessary to require additional screening along the southern edge of two field units by planting a line of heavy standard trees, or a suitably agreed alternative which provides the same or greater screening function.

National Highways advised condition

“During the first planting season following the grant of planning permission, heavy standard trees shall be planted along the southern boundaries of the two solar panel fields located within the south-eastern extent of the development. The trees shall be provided with aftercare to support early establishment and growth in order to provide screening of the

development for M4 motorway users. Any planting that fails shall be replaced within the next available planting season. The screening function of the planting shall be maintained as such for the duration of use.

Reason: in the interest of the safe and efficient operation of the M4 motorway, to mitigate an otherwise unacceptable impact on highway safety from glint/glare effects, in accordance with DfT Circular 01/2022.”

In terms of supporting local landscape character, it would be preferable if any required tree screening required by National Highways adopts the form of connecting woodland belts (between existing areas of woodland and ancient woodland) or additional tree structure introduced in the form of hedgerow trees and/or field edge wood pasture, rather than simply planting a row of standard trees.

Natural England

I the comments of Natural England contained within their consultation response, identifying an environmental opportunity to link existing areas of isolated Ancient Woodland with new linking wooded corridors, as an appropriate local enhancement measure. I fully support this idea, and consider this would help provide additional screening, potentially help address glint and glare for motorway users and for nature recovery through enhanced habitat connectivity, which would also support the objectives to deliver new tree planting within ‘The Western Forest’ a new (2025) national forest, and support the aims of the ‘Great Western Community Forest’ designation within the ‘Braydon Forest’ (historic former royal hunting forest).

I would suggest that a new linking structured woodland strip of planting could be planted to physically link areas of currently detached ancient woodland along Flaxlands Lane to join Frith Copse with Morris’s Copse and also along the northern edge of the application site, south of the small watercourse to link Frith Copse with Cowleaze Copse / Flaxlands Wood.

The landscape masterplan doesn’t currently seek to achieve any substantial additional visual screening from the north to effectively screen the BESS and substation area from the north and northwest or attempt to screen the northern perimeter panel fields from Koffs Farm direction and lower-level PRoWs located north of the site, which is why views of exposed development illustrated by submitted photo viewpoint 5 (**VP5**) will remain for the whole life of development. I appreciate that due to the rising elevated nature of the land the LVA doesn’t consider that northern perimeter planting would prove to be an effective visual screen, however, unless there are sound ecological or archaeological reasons to prevent tree planting in this location, the northern field boundary should be planted along the southern side of the watercourse to provide some lower-level screening from public footpaths and provide linking woodland habitat as a positive landscape enhancement and legacy for the project, and which may also function to help slow surface water runoff from these panel areas located on these steeper slopes.

Conclusion

I highlight that the site itself lies slightly elevated within the wider landscape on a local rolling shallow hill feature. The submitted LVA does not persuade me that this is a particularly suitable site for the proposed land use change given the nature and scale (area) of the proposed industrialising new development in combination with the elevated and sloping characteristics of the site. The resulting baseline will dramatically change in terms of land use and perceptual rural character at a local level.

While it is understood the site is not included within a nationally or locally designated landscape, I disagree with the LVA's assessment of local character. The LVA generally assesses the site and its context as having a **low** landscape value, which I disagree with. An assessed Low value implies less value than average. The overall local impression and sense of place following my site visit was of a distinctly rural, well wooded pastoral landscape that has some time depth qualities in the form of ancient woodland, unploughed pastures, historic hedge lines and fine mature and veteran oak trees. Parts of the site and adjoining areas are identified to be important priority habitat, and there are local cultural associations with historic and new woodland /forests, and common land. The character of Flaxlands Lane itself is a highly rural, narrow road with wide verges, which will be impacted by HGV traffic movements and by construction of numerous HGV passing bays.

The site lies elevated on a shallow rolling hill feature. Site areas located on the rising slopes will be visible, glimpsed from local roads, and largely framed between mature woodland blocks viewed from the wider landscape at medium and longer distances. The topography of the site affords some elevated vantage points, located on a highpoint along the Limestone Ridge which affords opportunities for public views over the lower vale landscape. The edges of national landscapes are also visible on distant horizon lines where extended views are possible through gaps in taller field boundary vegetation. The area also has a relatively dense rural Public Rights of Way network which provide access links to countryside including to open access land located to the north of the site at Lydiard Plain and Webbs Wood to the northwest. The resulting visual effects reduce in severity with increasing distance from the site.

For these above reasons the site and its context are not considered to be representative of low landscape value, if anything it is on the scale elevated above normal countryside character, due to its relative local intactness and moderate condition, and strength of character despite the site and locality also containing some detracting later insertions including an overhead transmission line /pylons crossing the southwest hillside slope, and presence of two communications towers on the plateaux and the audible influence of the M4 motorway. There are many landscape features and physical, visual, cultural associations which indicate a slightly elevated higher value to be more appropriate.

The nearest residential properties to development include 'Four acres Farm, Flaxlands Field Farm, The Shepherds Rest and Flaxlands Manor Farm and Stables, The Firs and Hayes Press (all located off Flaxlands Lane), together with Koffs Farm to the north and accessed from Green Hill will be most impacted by the construction, operation and decommissioning phases of this proposed development. Residents at The Shepherds Rest and Flaxlands Field Farm will experience the worst visual effects due to the relative proximity with development components, and general feeling of being surrounded by solar development.

Residents at Four Acres Farm are likely to experience substantial adverse effects from the BESS and sub-station during all project phases. Residential receptors at Hook are unlikely to experience adverse operational effects in my opinion but will endure noise and increased traffic movements during construction.

The users of the existing rural public rights of way network that passes through the site and/or near to it will experience the greatest levels of adverse visual change effects following the insertion of this proposed development, impacting the visual and perceptual rural experience.

There is unlikely to be much if any potential for harmful cumulative visual effects to arise from this development proposal in combination with other nearby solar PV and BESS development.

Cumulative landscape change from successive solar schemes remains a wider concern but is not raised as a reason to substantiate refusal for this application.

The proposed development introduces substantial industrialising change that will change the local rural character and sense of place impacting multiple receptors. Mitigation cannot fully address the resulting harm, although further mitigation and green infrastructure enhancement is recommended and considered to be achievable.

There is some Policy conflict with WCS, CP 51: landscape, as negative localised visual effects arising from the development have not been mitigated as far as they could through sensitive design or landscape measures. Specific residual harms are identified as conflicting with criterion, iv) Visually sensitive skylines, soils, geological and topographical features and criterion vi) Important views and visual amenity. The LPA should consider these identified local harms within their wider planning balance judgement.

End.