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Development Management
Shropshire Council
Shirehall
Shrewsbury
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Your Ref: 14/04930/FUL
Our Ref: gc_020215_Henley solar LVIA

2 February 2015

Dear Grahame

14/04930/FUL Construction of a solar farm of size 10.99ha; inverter cabins, transformers, two sub-station cabins, two ancillary equipment cabins; pole mounted CCTV cameras; security fencing; continued use of land for agricultural purposes, Land North Of Henley Common, Henley Lane, Acton Scott, Shropshire

Following the submission of further documents for consultation, the **Shropshire Hills AONB Partnership wishes to re-state its objection to this application**, and to draw to the attention of the planning authority the serious shortcomings of the Landscape and Visual Assessment (LVIA) submitted by the applicant. As stated in our objection of 10 December 2014, **the assessment focuses much too heavily on visual aspects, and neglects to assess properly the landscape effects, which are distinct**. It is only through this neglect that the applicant's assessment is able, erroneously in our opinion (and that of many other consultees), to conclude that this intrusive large development can be accommodated in this sensitive and high quality area of landscape without significant harm. We draw extensively below (in italics, with emphasis added) on the nationally accepted 'Guidelines for Landscape and Visual Impact Assessment' (GVLIA, 2013), focusing in particular on how these show that **the Landscape Assessment part of the applicant's document is flawed and partial and clearly does not comply with the Guidelines**.

The very first paragraph 1.1 of the Guidelines state:

"Landscape and Visual Impact Assessment (LVIA) is a tool used to identify and assess the significance of and the effects of change resulting from development on both the landscape as an environmental resource in its own right and on people's views and visual amenity".

The Guidelines go on at para 2.4 *"The importance of the ELC (European Landscape Convention) definition is that it moves beyond the idea that landscape is only a matter of aesthetics and visual amenity. Instead it encourages a focus on landscape as a resource in its own right."*

2.11 As the ELC makes clear, particular attention needs to be given to landscape because of the importance that is attached to it by individuals, communities and public bodies. Landscape is important because it provides:

- *a shared resource which is important in its own right as a public good;*
- *an environment for flora and fauna;*
- *the setting to day to day lives – for living, working and recreation;*
- *opportunities for aesthetic enjoyment;*
- *a sense of place and a sense of history, which in turn contribute to the local, national and European identity;*
- *continuity with the past through its relative permanence and its role in acting as a cultural record of the past;*

- *a source of memories and associations, which in turn may contribute to wellbeing;*
- *inspiration for learning, as well as for art and other forms of creativity.*

2.18 LVIA must address both effects on landscape as a resource in its own right and effects on views and visual amenity.

3.20 ... *Sometimes there may be likely significant effects on the landscape resource but the development may be in a location that does not affect visual amenity significantly.*

3.21 ...*In LVIA there must be identification of both:*

- *Landscape receptors, including the constituent elements of the landscape, its specific aesthetic or perceptual qualities and character of the landscape in different areas; and*
- *Visual receptors, that is, the people who will be affected by changes in view or visual amenity at different places.*

Our commentary: The LVIA states that landscape receptors are identified, but does not make clear what these are.

Chapter 3 summary, bullet point 10:

In most cases, it will be essential to give detailed and equal consideration to both effects on the landscape as a resource (Chapter 5) and effects on views and visual amenity as experienced by people (Chapter 6).

5.7 *Links to cultural heritage and historic landscape character*

5.9 *The history of the landscape, its historic character, the interaction between people and places through time, and the surviving features and settings may be relevant to the LVIA baseline studies, as well as the cultural heritage topic. The evaluation needs to consider both the historic landscape characterisation and the Landscape Character Assessment.*

Our commentary: The LVIA does not refer at all to Shropshire's published Historic Landscape Characterisation, and therefore addresses this area inadequately.

5.31 *Assessment of the value attached to the landscape should be carried out within a clearly recorded and transparent framework so that decision making is clear.*

Our commentary: Most of the Landscape Impact Assessment part of the LVIA is an unstructured stream of paragraphs, full of misplaced references to visual aspects, and there is no clarity at all about how the sudden overall conclusion of 'Slight Adverse Landscape Impact' is reached.

Chapter 5 summary points of the Guidelines include:

- *A landscape baseline report should set out the findings of the baseline work. It should be clear, well structured, accessible and supported by appropriate illustrations. The aim should be to describe the landscape as it is at the time but also to consider, if possible, what it may be like in the future, without the proposal.*
- *To identify and describe the landscape effects the components of the landscape that are likely to be affected by the scheme, often referred to as the 'landscape receptors', should be identified and interactions between them and the different components if the development considered, covering all types of effect required by the Regulations.*
- *The effects identified at the scoping stage should all be reviewed in the light of the additional information obtained through consultation, baseline study and iterative development of the scheme design. They should be amended as appropriate and new ones may also be identified.*
- *The landscape effects must be assessed to determine their significance, based on the principles described in Chapter 3. Judging the significance of landscape effects requires methodical consideration of each effect that has been identified, its magnitude and the sensitivity of the landscape receptor identified.*

- To draw final conclusions about significance the separate judgements about sensitivity and magnitude need to be combined into different categories of significance, following the principles set out in chapter 3.
- The rationale for the overall judgement must be clear, demonstrating how the judgements about the landscape receptor and the effect have been linked in determining overall significance.
- A clear step by step process of making judgements should allow the identification of significant effects to be as transparent as possible, provided that the effects are identified and described accurately, the basis of the judgements at each stage is explained and the effects are clearly reported, with good text to explain them and summary tables to support the text.

Our commentary: The LVIA does not follow this structured process for assessing landscape impact. Landscape receptors are not clearly identified, nor their sensitivity, nor the significance of each identified landscape effect on them. The flow diagram from the Guidelines reproduced below shows the rigour required in assessing landscape sensitivity, which is simply not present in the LVIA. The basis of the judgements at each stage are not clearly reported, and there are no summary tables to support the text.

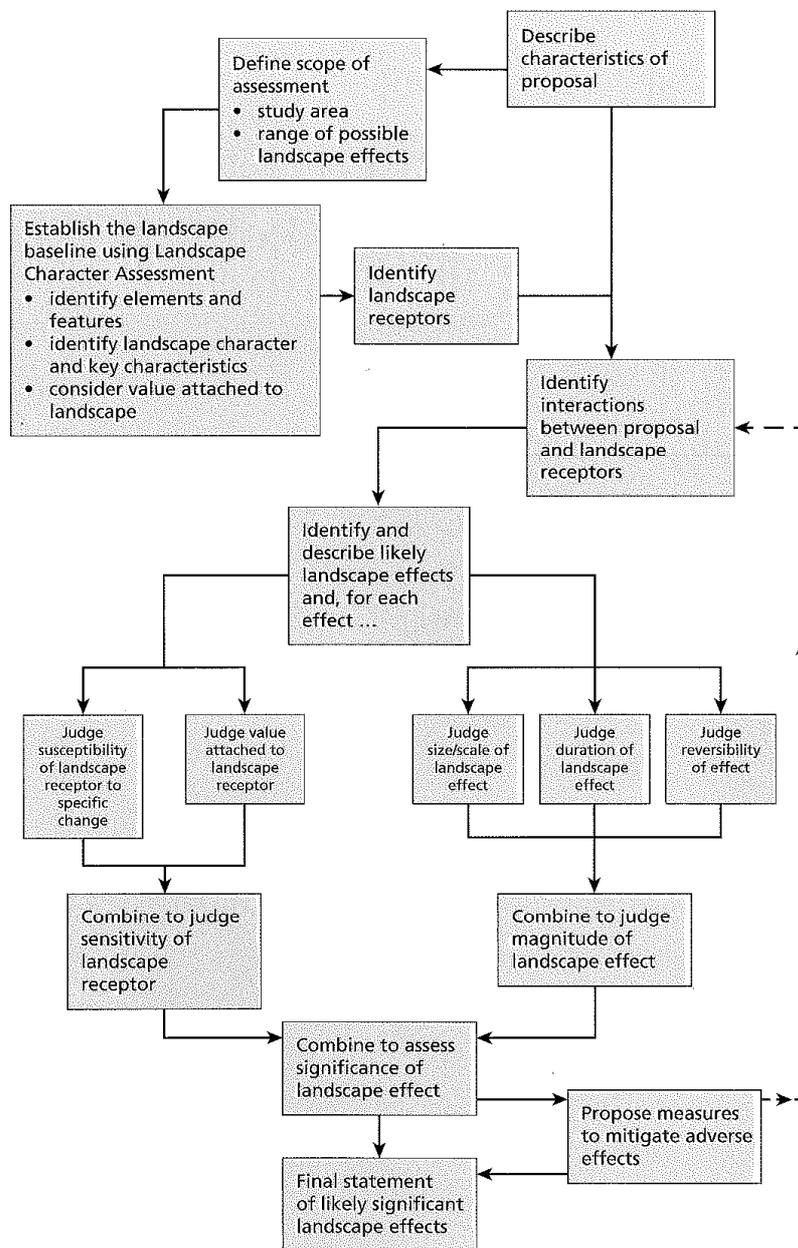


Figure 5.1 Steps in assessing landscape effects

*Chapter 8 summary - Presenting information on landscape and visual effects
In view of the clear differences between landscape effects and visual effects and the potential for them to be confused, it is good practice to report on them separately and to clearly distinguish between them.*

Our commentary: The LVIA clearly does confuse Landscape and Visual aspects. The Landscape Impact Assessment section is full of confusing references to visual aspects – for example page 24 of the document includes the words ‘view’, ‘visibility’ or ‘seeing’ no less than nine times, and in virtually every paragraph.

Other comments:

Content put forward in the LVIA on the level of use of paths in the area is extremely anecdotal, and inaccurately plays down the value of these in order to justify the development.

The LVIA rightly states that the AONB Management Plan provides guidance on the protection of the landscape, where the Landscape Typology does not. It chooses not however then to quote the first priority in the Management Plan with regard to the Stretton Valley, Wenlock Edge and Dales area:

“The need to retain character and limit the negative impacts of change and development is probably more acute here than anywhere else in the AONB.”

The National Character Area Profile is also quoted selectively, omitting the most relevant references to character and the impact of development, in the ‘Statements of Environmental Opportunity’:

SEO 1: Protect and enhance the unique character of the Shropshire Hills NCA – with its distinctive landforms, outstanding geology and diverse historic environment – to provide and maintain a sense of place, enhance biodiversity, and promote an enhanced understanding and enjoyment of the area.

SEO 3: Conserve, manage and enhance the area’s diverse historic environment, including its features and their settings (archaeological sites, buildings in a wide range of vernacular styles, and landmark features such as castles and hill forts). Conserve, manage and enhance the integrity of the area’s heritage, providing a sense of time depth across the whole landscape – in historic towns, field patterns, veteran trees, ancient paths and trackways, and industrial heritage – to provide and maintain a sense of history and place, to encourage recreation, and to promote an enhanced understanding and enjoyment of the area.

The overall consequence of the shortcomings in the LVIA is to undervalue the quality and character of this area of landscape and therefore understate the impact of the proposed development on it. The LVIA states that individual landscape elements such as mature trees and the historic field pattern will be unaffected by the development, but **fails to address the obvious very large effect on landscape character of the introduction of many thousands of industrial structures into a high quality rural setting where these are not currently found.**

We urge to Council to give proper weight to the AONB designation and its strong protection in policy and to reject this application.

Yours sincerely

George Chancellor
Chair
on behalf of Shropshire Hills AONB Partnership