Independent Review of the Landscape and Visual Impact Assessment (LVIA)

Planning Application: P25/V1646/FUL – Old Hayes Solar Farm, Coleshill

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This critique has been written by Dr Helen Farrell, a local resident with an academic background in spatial planning. I am not a professional planning consultant and have undertaken this review voluntarily, without payment, as an interested member of the community.

Purpose and Scope

This independent review examines Chapter 4 *Landscape and Visual* of the Environmental Statement submitted by Abei Energy for the proposed solar farm at Coleshill. It assesses the methodology, coverage, and conclusions of the LVIA against best-practice guidance (GLVIA3 - Landscape Institute & IEEM, 2013) and relevant Vale of White Horse Local Plan 2031 (Parts 1 & 2) policies, specifically Core Policy 44, Core Policy 46, and Development Policy 30.

Key Findings and Omissions

1. Residential Visual Amenity Assessment (RVAA) omitted: No formal RVAA despite several dwellings within 700 m.
2. Unverified ZTV and limited viewpoint coverage. Underlying GIS data and rationale for viewpoint selection not published; possible omission of National Trust, Badbury Hill, and Coleshill Conservation Area viewpoints.
3. Over-reliance on long-term planting. 'No significant impact' conclusions depend on full planting maturity at Year 15 with no evidence of enforceable 40-year management.
4. Lack of winter / worst-case visualisations. Most images show partial foliage; true leaf-off conditions not depicted.
5. Hedgerow removal under-represented. Up to 1 m gaps for fencing and access not modelled in photomontages.
6. Absence of peer review. No independent verification of methodology by a Chartered Landscape Architect acting for the LPA.
7. Under-assessment of heritage and cumulative context. Limited reference to the Coleshill Conservation Area, listed buildings, or other solar proposals.

Policy Context

The policies referenced are from the adopted Vale of White Horse Local Plan 2031 (Parts 1 & 2), which remain fully in force. They provide the relevant legal framework for landscape, biodiversity, and watercourse protection.

Core Policy 44 – Landscape Character: Requires conservation and enhancement of local landscape qualities.

Core Policy 46 – Conservation & Improvement of Biodiversity: Development must protect and enhance biodiversity and habitats.

Development Policy 30 – Watercourses: Requires minimum 10 m buffer each side of watercourses and ecological corridor enhancement.

Objections and critical commentary

Having reviewed Chapter 4 – Landscape and Visual and the associated figures, I wish to highlight several omissions and methodological weaknesses that materially affect its conclusions.

Key viewpoints may be missing or insufficiently represented

The LVIA says 20 RVPs were selected and agreed with the LPA, but it is not clear whether *all* sensitive receptor locations were included (e.g., specific vantage points on National Trust land, certain viewpoints from Badbury Hill, or vantage points within Coleshill Conservation Area or Buscot/ Coleshill Estate).

Over-reliance on planting/ long timescales to "remove" harm

The LVIA's conclusions of "no significant residual effects" rely on planting schemes assumed to mature fully by Year 15 (paras. 4.352–4.377). This seems optimistic: planting failure, disease or inadequate maintenance would result in permanent harm to landscape character. The LVIA offers no contingency analysis or evidence of enforceable management over the full 40-year operational period.

Questionable assumption for residential visual amenity (no full RVAA)

The LVIA (para. 4.55) explicitly states that a Residential Visual Amenity Assessment was not considered necessary because "generally low levels of visual effects" were anticipated. This assumption is circular and unjustified. Properties including Worsall Farm, Pennyswick Farm, Wythgreen Cottages and dwellings on the edge of Coleshill are within 500–700 m of the site and face direct views across open ground. A full RVAA is required to establish whether these residents would experience an overbearing or intrusive visual presence.

ZTV methodology and validation needs scrutiny

The LVIA relies on a 4 km ZTV and a set of 20 representative viewpoints (RVPs) agreed at scoping, but it is unclear whether all locally-valued vantage points (including specific points on National Trust land, views from Badbury Hill and key 'important views' from Highworth/ Coleshill) were assessed. The RVPs and the ZTV GIS data should be provided for public scrutiny. Without the underlying data, it is impossible for third parties to verify the visibility assumptions (panel height, ground model, hedgerow

heights, and observer height). The omission of key viewpoints on National Trust land, Badbury Hill, and Public Rights of Way near Snowswick Lane appears to under-represent actual public visibility.

The assessment underplays the relationship between landscape effects and the setting of the Coleshill Conservation Area, listed farmsteads, and the wider National Trust landscape. No cumulative ZTV or combined assessment of nearby or emerging solar schemes has been presented.

Baseline photography / winter leaf cover limitations

The photomontages (Appendix 4.5) appear to show foliage conditions inconsistent with "leaf-off" scenarios. Para. 4.93 admits that winter photography was limited. Given that many local hedgerows are deciduous, the absence of true winter worst-case views materially underplays visual impact.

Effect of proposed hedgerow/ vegetation removals on visibility is downplayed

The LVIA states that up to 1 m hedgerow sections will be removed to accommodate fencing and access (mitigation section), yet these changes are not reflected in the photomontages. This could significantly increase visibility along Snowswick Lane and local PROWs.

Cumulative effects may be under-assessed

The LVIA says the study considered cumulative effects but it is not clear whether it included *all* nearby proposals (approved, submitted, and foreseeable) and whether combined views (multi-site views) were modelled. If the LVIA excludes certain plausible cumulative schemes, a cumulative ZTV (CZTV) and extra RVPs are required. (LVIA references cumulative assessment in Appendices but it would be helpful to see the exact list). Note that the grid/ power station connection is not mentioned.

Night-time / security lighting assumption may be optimistic

The LVIA says no night assessment is needed because "no lighting proposed." But security requirements for BESS/ compound/ maintenance or unforeseen CCTV/ lighting could introduce night-time impacts.

Certainty claim is overstated

The LVIA claims a “high level of certainty” that mitigation will work if secured by condition. That is not the same as demonstrable on-ground mitigation; conditions are not guaranteed (we may see developer insolvency or management failures in that period). The residual effects table (Tables 4.3/ 4.4) depends on future actions not present reality.

Specific policy tension underplayed

The LVIA concludes “strong level of compliance” with policy, but it arguably understates the effect on locally valued views, tranquillity and setting of conservation area/ listed buildings (several listed buildings are 0.4–1.1 km away). This brings the policy compliance statement into question. It would be helpful to see a direct mapping of the assessed residual effects to each Local Plan/ JLP policy test.

Recommendations

1. Require publication of full ZTV data and complete viewpoint list.
2. Request Residential Visual Amenity Assessment (RVAA) for nearby dwellings.
3. Request additional Year 1 and winter photomontages from sensitive viewpoints.
4. Review treatment of cumulative schemes and heritage settings.
5. Re-evaluate LVIA conclusions once verified, and reconsider the weight given to them in the planning balance.

While the LVIA carries professional weight, its reliance on optimistic mitigation and untested assumptions limits its reliability. These deficiencies should be addressed through additional information and independent verification before any planning decision is taken.