Landscape Rebuttal

Land South of Park House Farm, Meriden Road, Fillongley

Installation of a 40MW solar photovoltaic array/solar farm with associated infrastructure.

On behalf of the Appellant, Enviromena

Date: 24/03/2025 | Pegasus Ref: P24-1827

LPA Ref: PAP/2023/0071

Author: Andrew Cook BA (Hons) MLD CMLI MIEMA CEnv

Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
2	24.03.2025	AC	AC/CR	Minor amendments to the text

Contents.

Appendices

1. Introduction and Scope of the Rebuttal

Introduction

1.1. This rebuttal evidence has been prepared with regard to the following matters:

- Clarifications relating to the Bare Earth Zone of Theoretical (ZTV) presented in Appendix 9 of the Appellants Landscape Evidence and commentary on the photography presented in Sam Oxley's (SO) Landscape Proof.

- Observations relating to the Accurate Visualisations prepared by Andy Maw Design Limited (AMD) and Troopers Hill Limited (THL).

2. Zone of Theoretical Visibility Mapping

2.1. There are two ZTV plans which are appended to this rebuttal evidence;

- Appendix 1: Bare Earth ZTV

- Appendix 2: Screened ZTV.

2.2. The Bare Earth ZTV presented in Appendix 1 is identical to the one presented as part of my evidence (Appendix 9 of the Landscape Proof) except for amendments to the text within the key, which previously incorrectly referred to the digital model including 'screening features' such as buildings and woodland.

2.3. The text in the key for the Bare Earth ZTV has been corrected to solely refer to the model utilising the digital terrain model (DTM) provided by the Ordnance Survey (OS). The OS Terrain 5 referred to in the key relates to the OS dataset which is terrain data available at 5m intervals.

2.4. I also have prepared a second 'Screened' ZTV (Appendix 2), as set out in the key, the data used to prepare this plan includes both the DTM data and National Tree Map (NTM) data from Bluesky[1] which captures the height and canopy spread of every tree over 3m in height. This NTM data was also combined with OS Open Map Local Buildings data (set to an indicative height of 8m). Linear hedgerows are not included in the model as screening features.

2.5. As set out in my Landscape Proof of Evidence, Guidelines for Landscape and Visual Impact Assessment (Third Edition) (GLVIA3) places an emphasis on fieldwork to establish the visibility of a scheme, rather than the overreliance on computer-generated visibility mapping.

2.6. I acknowledge that it is good practice for landscape professionals to use ZTVs (both bare earth or screened) where necessary to aid in the initial stages of a Landscape and Visual Impact Assessment (LVIA) to refine the number of locations to visit on a site visit and any key visual receptors, with any chosen locations verified by a site visit.

2.7. I would however emphasise that whilst a ZTV is a useful tool, just because an area on the mapping is shown as being within the extent of the ZTV shading (shown in yellow), due to the nature of any ZTV model, this is always heavily caveated as being an area from which

[1] https://bluesky-world.com/wp-content/uploads/2024/05/Bluesky-Data-Sheet-2024_NTM_web_.pdf

'theoretically' the scheme could be visible. Furthermore, I would like to emphasise, that from any areas within the ZTV shading (yellow areas), the software is not advanced enough to inform users If they can for example see the whole development or just the very top corner of a solar panel in the furthest field.

2.8. For example, Figure 2.5 on page 22 of SO's Landscape Proof is recorded from the Public Right of Way (PRoW) near Tippers Hill Farm. Whilst no exact location is given for the viewpoint I have reviewed the information provided and propose that it is located nearly 2km (1.8km) from the nearest northern point of the appeal site. Whilst the extents of the appeal site are not defined on SO's photo, the effects on these high sensitivity receptors would be no greater than Negligible at Year 1 with the appeal scheme being barely discernable in the view due to distance, intervening vegetation and topography, and the very small portion of this wide expansive view which the appeal site would occupy.

2.9. I am also concerned by the way the photo at SO's Figure 2.5 (near Tippers Hill Farm) has been displayed as it appears to have been cropped or zoomed. I raise this concern due to observations relating to some of SO's photography for which I have almost identical photos. For example, I would note that Figure 2.8 of SO evidence is taken in almost the same location as my Viewpoint 13 based on the vegetation visible in the middle ground of the photo, however, SO's photo shows a much smaller field of view, compared to my photograph. Guidance provided by the Landscape Institute (Technical Guidance Note 06/19) Visual Representation of development proposals, provides specifications for the camera equipment used to record the photography for visualisations. It is unclear what the specification of the camera used by SO to record their photography is, but it is either not with a 50mm lens as is advised, or the images have been cropped/zoomed.

2.10. A comparison between Viewpoint 13 in my Landscape Evidence and the extent of SO's Figure 2.8 is set out in Appendix 3.

3. Accurate Visualisations Observations

3.1. I acknowledge that criticism has been levelled at the visualisations commissioned by the client, as part of the application, prior to Pegasus Group's involvement. I would note, however, that at no point has North Warwickshire Borough Council raised concerns relating to the application visualisations.

3.2. I would note that whilst visualisations can be a helpful tool in assessing a scheme, at no point in my evidence do I state that I rely on them to inform my visual analysis and assessment. In order to carry out my assessment I have relied upon my own TGN 06/19 compliant photography and visited the appeal site and its surroundings on multiple occasions.

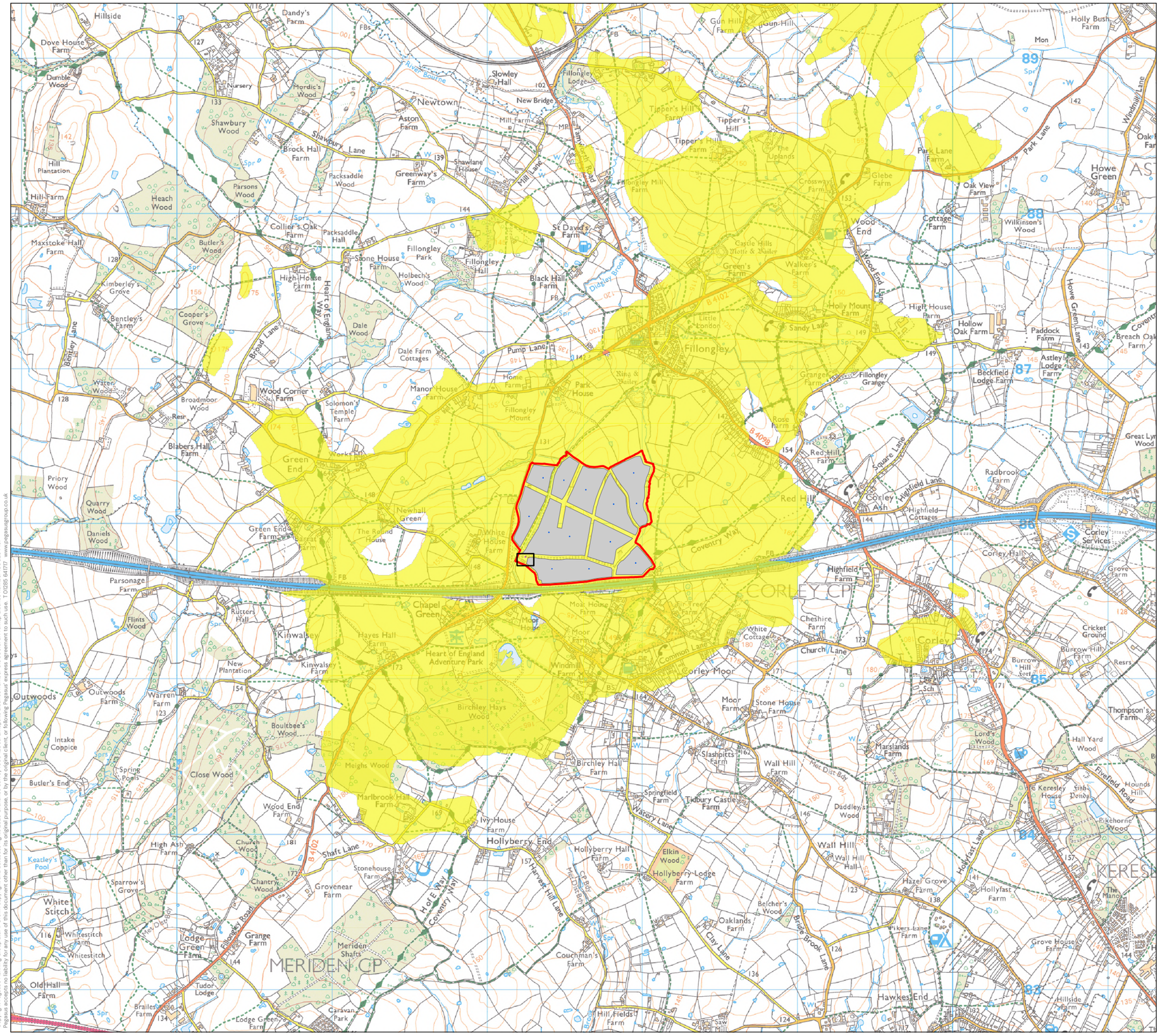
3.3. With regards to the Accurate Visualisations provided as part of Rule 6 Parties submission prepared by AMD and THL. I note that they are TGN 06/19 compliant with regard to their presentation and the equipment used to capture the photography.

3.4. I also note that in Appendix A, page 21, with regard to the 'supplied data' they list the Landscape Strategy, Planning Layout and lidar data, but they haven't listed the elevations, so we do not know what they have relied upon to prepare their 3D model. I would also note that they will only have had access to the PDF versions of the plans they reference, as opposed to the dwg/digital file (which have not been requested from either the Appellant or Pegasus Group), so they will have effectively had to draw the digital layout themselves based on the PDF, which is potentially less accurate than using a dwg or digital model.

3.5. With regards to the heights of the vegetation shown at Year 15, I would note that whilst AMD and THL have referred to relying upon the Landscape Strategy (prepared by Pegasus Group) it is unclear what height the landscape proposals would be managed at based on their visualisations as there is no reference to management heights in their document; vegetation such as hedgerows shrubbery should be managed at 2.5m tall by Year 15. At this point it is important to acknowledge the height of the tallest edge of the panels is 2.3m (226cm). I would therefore expect the vegetation shown in Viewpoint 1 of the document to be taller at Year 15 than is currently shown.

3.6. Similarly, Viewpoint 2 within the AMD and THL document is from Meriden Road and looks towards the western boundary of the appeal site. Based on the Landscape Strategy the near boundary visible in the view would be bolstered with additional shrub planting, which would then be managed at 2.5m height. I note the current Year 15 scenario shows very little growth and therefore greater visibility.

APPENDIX 1: BARE EARTH ZONE OF THEORETICAL VISIBILITY



KEY

- Site Boundary

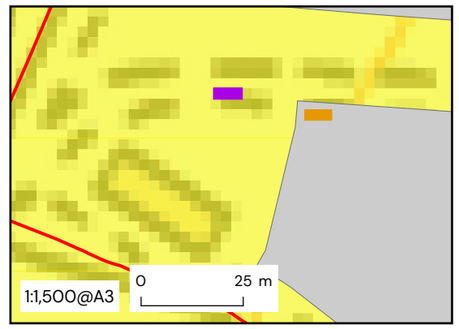
Proposed Development

- Solar PV Areas - 2.3m Development Height
- Transformer Station - 2.6m Development Height
- Customer Substation - 3m Development Height
- DNO Substation - 3m Development Height
- Bare Earth Zone of Theoretical Visibility - Multiple Development Heights

Bare Earth ZTV Production Information -
- DTM data used in calculations is OS Terrain 5.

- Viewer height set at 1.7m
  (in accordance with para 6.11 of GLVIA Third Edition)
- Calculations include earth curvature and light refraction

N.B. This Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the development may be visible from, assuming 100% atmospheric visibility. It is generated using terrain data only and does not account for any screening that vegetation or the built environment may provide. It is, as such, 'a worst case' ZTV and the actual extents of visibility are likely to be less extensive.



BARE EARTH ZONE OF THEORETICAL VISIBILITY

LAND SOUTH OF PARK HOUSE FARM, FILLONGLEY

ENVIROMENA PROJECT MANAGEMENT UK LTD

N
0 1 km

DATE	SCALE	TEAM	APPROVED
20/03/2025	1:25,000@A3	NC	CR

SHEET	REVISION
-	B

DRAWING NUMBER
P24-1827_EN_09

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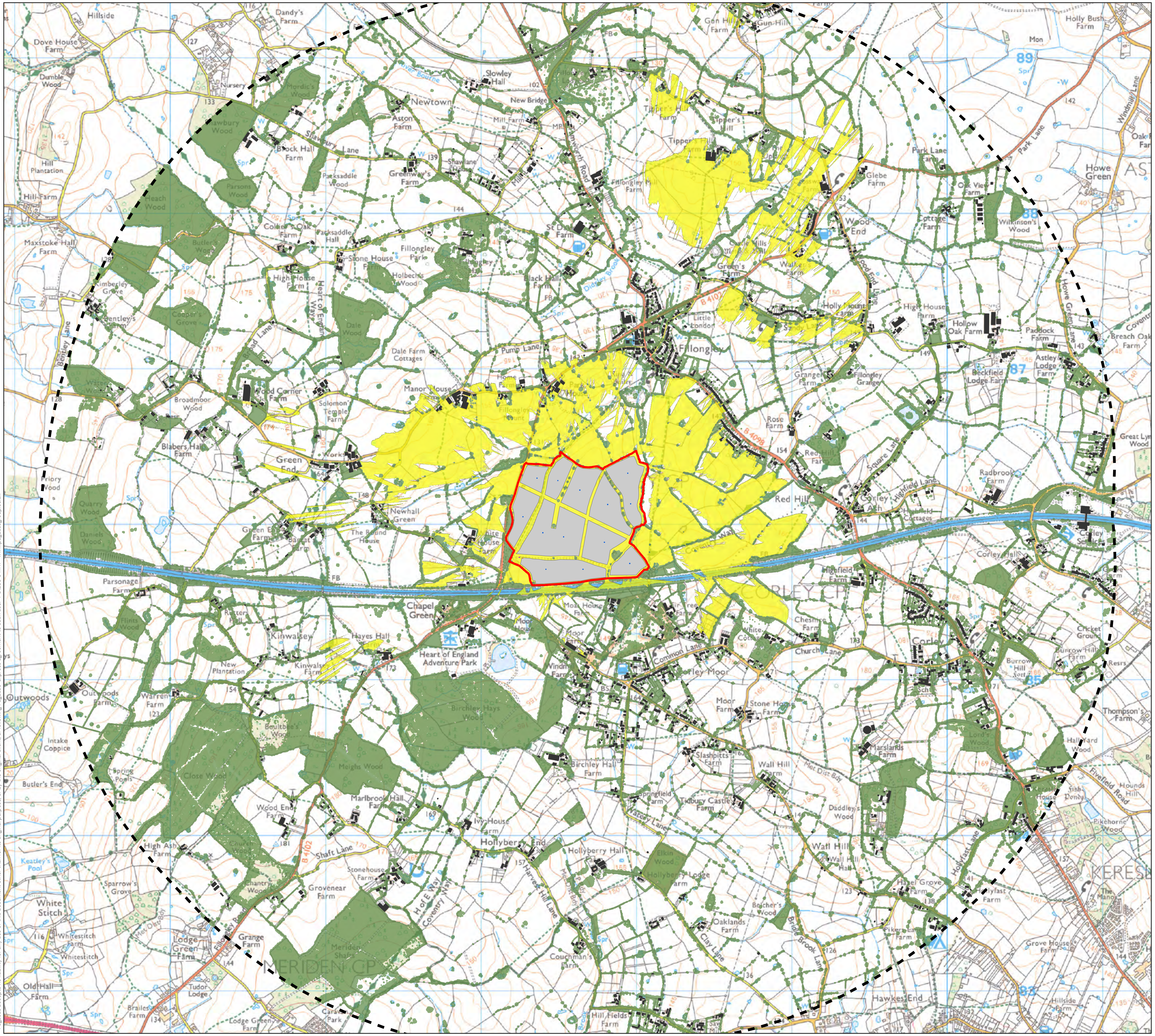
APPENDIX 2: SCREENED ZONE OF THEORETICAL VISIBILITY



KEY

Site Boundary

3km Buffer

OS Local Buildings

National Tree Map Data

Screened Zone of Theoretical Visibility

Proposed Development

Solar PV Areas – 2.3m Development Height

Transformer Station – 2.6m Development Height

Customer Substation – 3m Development Height

DNO Substation – 3m Development Height

Screened ZTV Production Information –
- EA LiDAR Data (Environment Agency Open Data Release) has been utilised, combining the Digital Terrain Model (DTM) with Bluesky's National Tree Map (NTM) data.

- NTM is a detailed dataset covering England and Wales. It provides a comprehensive database of location, height and canopy spread for every single tree 3m and above in height. This is created from stereo aerial photography. Heights used within the model are the MAXIMUM heights supplied with the dataset.
- OS Open Map Local Buildings - set to indicative 8m height.
- Viewer height set at 1.7m (in accordance with para 6.11 of GLVIA Third Edition)
- Calculations include earth curvature and light refraction

N.B. This Zone of Theoretical Visibility (ZTV) image illustrates the theoretical extent of where the development may be visible from, assuming 100% atmospheric visibility, and includes the screening effect from vegetation and buildings, based on the assumptions stated above.

Date of LiDAR data: 2022

SCREENED ZONE OF THEORETICAL VISIBILITY

LAND SOUTH OF PARK HOUSE FARM, FILLONGLEY

ENVIROMENA PROJECT MANAGEMENT UK LTD

N
0 1 km

DATE	SCALE	TEAM	APPROVED
20/03/2025	1:25,000@A3	CS	CR

SHEET	REVISION
-	A

DRAWING NUMBER
P24-1827_EN_15

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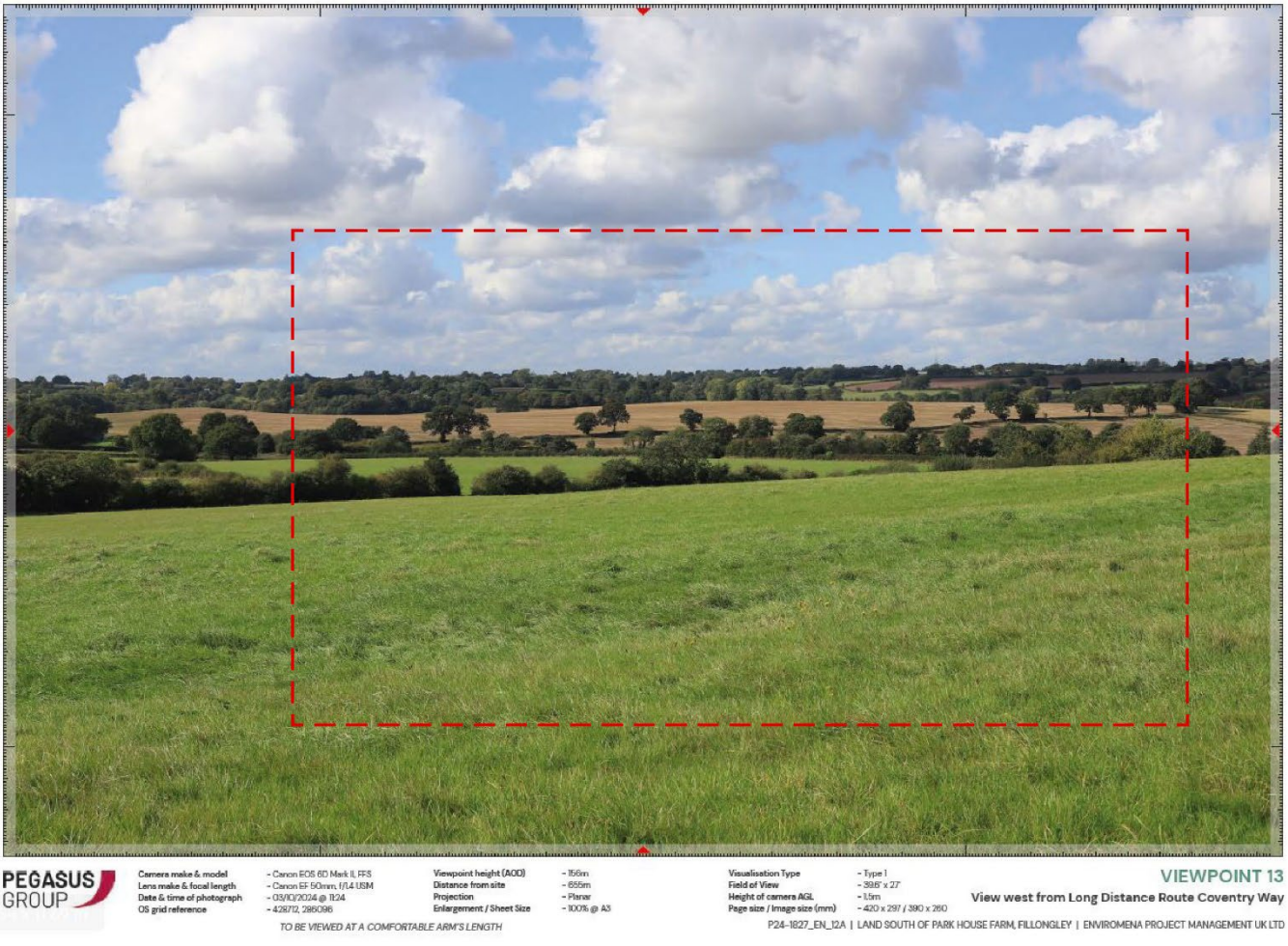
APPENDIX 3: COMPARISON OF VIEWS OBTAINED FROM THE COVENTRY WAY

SO Landscape Evidence: Figure 2.8 View looking west across to site from Coventry Way PRoW – between VPs 6 and 13

Viewpoint 13: Appellants Landscape Evidence comparison. The extent of SO's Figure 2.8 is illustrated by the red dashed line.



Cirencester

33 Sheep Street, Cirencester GL7 1RQ
T 01285 641717
Cirencester@pegasusgroup.co.uk
Offices throughout the UK and Ireland.

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