REBECCA GREATRIX: LANDSCAPE AND VISUAL

PROOF OF EVIDENCE

1. QUALIFICATIONS AND EXPERIENCE

1.1 My name is Rebecca Greatrix. I am a landscape architect and Chartered Member of the Landscape Institute (2005) with 23 years of post-graduate experience.

1.2 I hold an undergraduate BA (Hons) Degree in Landscape Architecture (1999) and a Post Graduate Diploma in Landscape Architecture (2002) from Leeds Metropolitan University (now known as Leeds Beckett University).

1.3 I am an Associate Director of Landscape Planning at Land Use Consultants Ltd (LUC) and have been employed by LUC since July 2022. Prior to this I was employed by Gillespies LLP (Gillespies) and Golder Associates (now WSP).

1.4 My experience includes the development of methodologies in, and application of Landscape and Visual Impact Assessment; including development of mitigation proposals. In the course of my work relating to infrastructure, I have undertaken and played a key role in Landscape and Visual Impact Assessments and Landscape and Visual Appraisals (LVA) for several high-profile energy infrastructure projects such as below:

1.4.1 National Grid Cotswolds Visual Impact Provision (VIP) ("the **Project**") as discussed further in paragraphs 1.7 and 1.8. This project will deliver substantial landscape and visual improvements through the removal of net 16 pylons and approximately 7km of overhead line ("**OHL**") through the Cotswolds National Landscape. The details of the Project are described in the evidence of Amardeep Malhi.

1.4.2 National Grid Bramford to Twinstead

1.4.3 National Grid Eryri VIP

1.4.4 National Grid Peak District East VIP

1.4.5 National Grid Bryncir Substation

1.4.6 National Grid North Wales Connection

1.5 I provided landscape and visual advice in relation to routeing and siting of energy transmission infrastructure for the above projects, as well as for the National Grid Yorkshire GREEN Project.

1.6 This Proof of Evidence is prepared in support of the confirmation of The National Grid Electricity Transmission ("**NGET**") Plc Cotswolds Visual Impact Provision Compulsory Purchase Order 2025 ("**CPO**"). It also responds to objections raised in relation to the CPO which are relevant to my area of expertise.

1.7 I was directly involved in overseeing the preparation of the following documents and drawings which formed part of the consented planning applications related to the Project:

1.7.1 **Landscape and Visual Appraisal** (LVA) 2024 (CD D5). This was submitted as part of the planning applications for both the Whittington (southern) and Winchcombe (northern) Cable Sealing End Compounds ("**CSECs**").

1.7.2 **Winchcombe Cable Sealing End Compound Preliminary Landscape and Ecological Management Plan** 2024 (CD B15). This was submitted as part of the planning application the Winchcombe CSEC at the northern end of the Project.

1.7.3 **Whittington Cable Sealing End Compound Preliminary Landscape and Ecological Management Plan** 2024 (CD B14). This was submitted as part of the planning application for the Whittington CSEC at the southern end of the Project.

1.7.4 **Melksham Shunt Reactor Landscape and Visual Appraisal** 2024 (CD B16). This was submitted as part of the planning application for a new shunt reactor at Melksham Substation, outside the Cotswolds National Landscape.

1.8 Prior to the submission of these planning applications, I contributed to and/ or produced the following reports which informed the decision-making process which has led to the development of the Project and the making of the CPO:

1.8.1 I was part of the team of landscape architects from Gillespies and LUC who undertook landscape and visual assessments of all existing National Grid overhead lines within National Parks and National Landscapes in England and Wales. The result of this work is presented in - **National Grid (2014) 'Landscape and Visual Impact Assessment of Existing Electricity Transmission Infrastructure in Nationally Protected Landscapes in England and Wales' (**VIP Technical Report**)** (CD D1). This work involved dividing up the existing overhead lines into subsections for analysis and a comparison of the level of importance of landscape and visual impact. At this time, I was not involved in the assessment of the sections of existing National Grid infrastructure in the Cotswolds, but given my involvement in other sections, I understood the methodology, approach, and its application.

1.8.2 I undertook a high level, desk top appraisal of the ZF.2[1] section of National Grid's transmission infrastructure within the Cotswolds National Landscape to assist National Grid with decision making - **Gillespies (2020) VIP Cotswolds AONB ZF.2 – High Level Appraisal** (CD D2)

1.8.3 I undertook a landscape and visual appraisal of potential CSEC siting zone options within the Cotswolds National Landscape to assist National Grid with decision making for the Cotswolds VIP Project - **Gillespies (2021) VIP Cotswolds CSEC Siting Study** (CD D4).

1.9 The decision-making process leading to the Project is described in the evidence of Mr Amardeep Malhi and Mr Chris Baines.

[1] Existing NGET overhead lines have unique codes for identification purposes. The overhead line (OHL) related to the Project is the 400kV Feckenham-Walham/Feckenham-Minety or 'ZF' OHL. This was subdivided as part of the VIP Technical Report for landscape and visual assessment purposes. Subsection ZF.2, to the east of Cheltenham, was judged to have a high score for landscape and visual impacts (CD D1).

2. INTRODUCTION AND SCOPE OF EVIDENCE

2.1 The structure of my statement of evidence is set out in paragraph 2.4 below.

2.2 My evidence relates to the landscape and visual considerations of the Project and demonstrates that the Project will result in substantial improvement to landscape character, visual amenity and natural beauty of the Cotswolds National Landscape.

2.3 References in my evidence to the core documents are made by the abbreviation, for example, "**(CD XX)**". The evidence of other witnesses is referred to by the name of the author. There is a glossary of key terms used by all the National Grid Electricity Transmission (NGET) witnesses at (CD F2) ("**the Glossary**") and my evidence adopts the terms defined in the glossary.

2.4 The remaining part of my statement of evidence is structured as follows:

2.4.1 Section 3 provides landscape and visual context for the Project;

2.4.2 Section 4 describes the methodology and approach taken to assess landscape and visual effects;

2.4.3 Section 5 sets out the baseline landscape and visual conditions;

2.4.4 Section 6 sets out the findings of the landscape and visual effects of the Project;

2.4.5 Section 7 addresses compliance with policy and statutory duties;

2.4.6 Section 8 provides a response to objections that relate to landscape and visual matters;

2.4.7 Section 9 sets out my summary and conclusions; and

2.4.8 Section 10 provides my declaration.

3. LANDSCAPE AND VISUAL CONTEXT

3.1 The Cotswolds was designated as an Area of Outstanding Natural Beauty ("**AONB**") in 1966 in recognition of its rich, diverse and high-quality landscape. AONBs are designated under the Countryside and Rights of Way Act 2000 ("**CRoW Act 2000**") for the purposes of conserving and enhancing the natural beauty. From 22 November 2023, AONBs were renamed as National Landscapes (though statutorily still referred to as AONBs). At 790 square miles, the Cotswolds National Landscape is the largest of the 38 National Landscapes in England and Wales, and the second largest protected landscape in England.

3.2 The aspects of natural beauty for which the Cotswolds National Landscape was designated can be summarised as the 'special qualities' of the area. The special qualities of the Cotswolds National Landscape are set out in Section 4 of the Cotswolds National Landscape Management Plan 2025-30 (CD D16). This describes the Cotswolds as "*a rich mosaic of historical, social, economic, cultural, geological, geomorphological and ecological features.*"

3.3 The special qualities are listed as follows:

3.3.1 "The unifying character of the limestone geology – its visible presence in the landscape and use as a building material;

3.3.2 The Cotswold escarpment, including views from and to the National Landscape;

3.3.3 The high wolds – a large open, elevated predominately arable landscape with commons, 'big' skies and long-distance views;

3.3.4 River valleys, the majority forming the headwaters of the Thames, and an important water resource;

3.3.5 Distinctive dry stone walls;

3.3.6 Flower-rich grasslands including floodplain meadows and neutral grasslands and particularly limestone grasslands;

3.3.7 Ancient broadleaved woodland particularly along the crest of the escarpment;

3.3.8 Variations in the colour of the stone from one part of the National Landscape to another which add a vital element of local distinctiveness;

3.3.9 The tranquillity of the area, away from major sources of inappropriate noise, development, visual clutter and pollution;

3.3.10 Extensive dark sky areas;

3.3.11 Distinctive settlements, developed in the Cotswold vernacular with high architectural quality and integrity;

3.3.12 An accessible landscape for quiet recreation for both rural and urban users, with numerous walking and riding routes, including the Cotswold Way National Trail;

3.3.13 Significant archaeological, prehistoric and historic associations dating back 6,000 years, including Neolithic stone monuments, ancient drove roads, Iron Age forts, Roman villas, ridge and furrow fields, medieval wool churches and country estates and parks;

3.3.14 A vibrant heritage of cultural associations, including the Arts and Crafts movement of the 19th and 20th centuries, famous composers and authors and traditional events such as the Cotswolds Olimpicks, Levellers Day and woolsack races."

3.4 The Cotswolds National Landscape is crossed by five NGET OHLs (4TE, 4YX, XL, ZF and ZFB[2]). Subsection ZF.2 of the 400kV Feckenham-Walham/Feckenham-Minety or 'ZF' OHL was identified within the VIP Technical Report commissioned by National Grid as a red category subsection, which denotes subsections which are judged to have overall combined landscape and visual impacts of high importance (CD D1). An extract from the report is included below in Plate 1.

[2] Existing NGET overhead lines have unique codes for identification purposes.

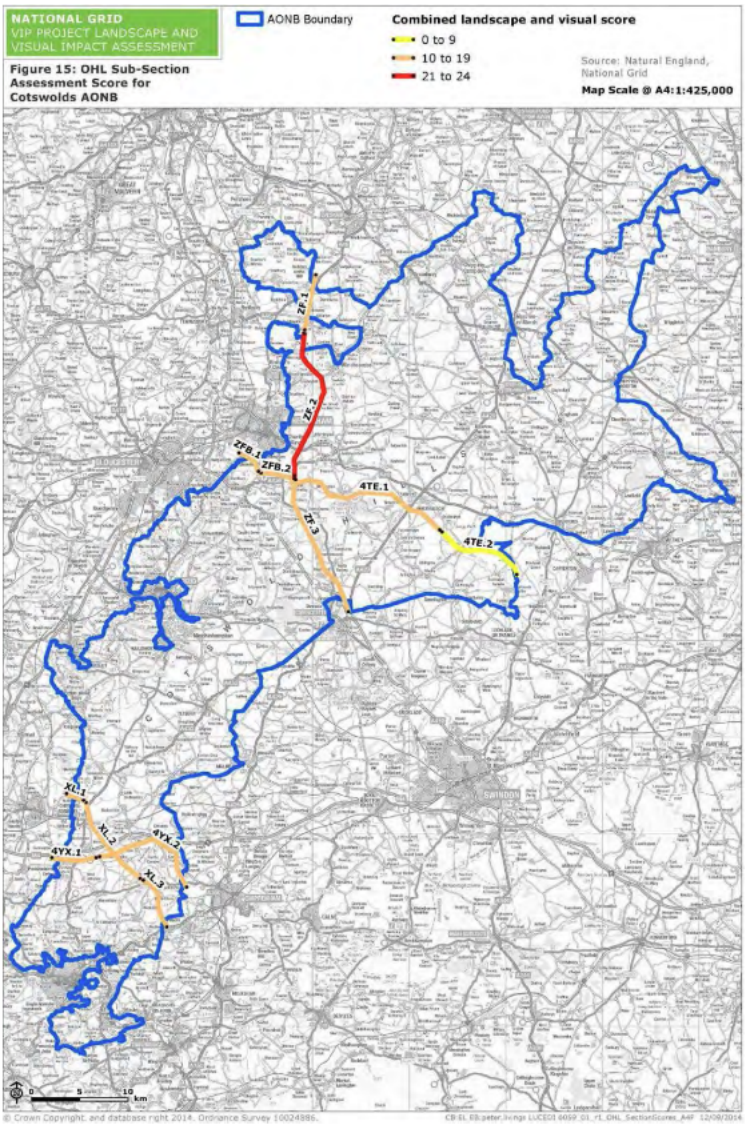


Plate 1: *Figure from the VIP Technical Report, illustrating National Grid infrastructure in the Cotswold National Landscape (CD D1)*

3.5 This results from the combination of a high score for landscape impact and a high score for visual impacts on users of trails and cycleways and visual impacts on visitors to publicly accessible sites. The LVIP Technical Report's findings in respect of the landscape and visual impacts of subsection ZF.2 were summarised as follows:

3.6 *"It has landscape impacts of high importance. The large-scale landscape which has few overt human influences, is of high quality and contains many features that are representative of the special qualities of the National Landscape. Expansive views across sparsely settled farmland and the distinctive skylines of the escarpments give the area a high scenic quality. The pylon line is a prominent feature which alters the rural qualities and tranquil nature of the landscape."*

3.7 *"In terms of visual impacts, although the scale of impact of ZF.2 varies, pylons are clearly visible from many locations. This subsection is therefore judged to have visual impacts that are of a high level of importance. The nearby town of Winchcombe and some small dispersed settlements have views of the pylon line, but the wide geographical spread of these impacts*

and the numbers of people affected means that overall the importance of visual impacts on communities is considered to be moderate. Local public rights of way are mainly concentrated around the scarp slopes with fewer footpaths on the high ground. Although in places pylons are very visible, overall the importance of impacts on these receptors is also considered to be moderate. The Cotswolds Way National Trail runs along the top of the scarp and there are also a number of regional trails in the area. High importance impacts are recorded for these recreational receptors. There are also a number of visitor locations within this subsection including Sudeley Castle and other heritage sites, panoramic viewpoints and a number of car parks. The presence of these encourages people to access the area. Visitors over a wide area are affected by views of pylons. High importance visual impacts are recorded for these receptor groups."

3.8 Following on from the VIP Technical Report, I am aware that National Grid progressed several projects in line with their VIP Policy 'How we intend to reduce the visual impact of existing electricity transmission lines in Areas of Outstanding Natural Beauty and National Parks' (CD D6). This is discussed further in the evidence of Mr Chris Baines. I was, professionally, involved in three proposed undergrounding projects, with the Peak District East VIP Project now being complete; the Eryri (Snowdonia) VIP Project under construction; and the Cotswolds VIP Project recently being granted planning permission.

3.9 It is my understanding that the Cotswolds VIP project was progressed by National Grid on the recommendation of the VIP Stakeholder Advisory Group (SAG); as set out in the evidence of Mr Chris Baines.

3.10 National Grid commissioned Gillespies to undertake a landscape and visual review of the ZF.2 subsection of OHL in the Cotswolds National Landscape in 2020 (CD D2). I undertook this study (CD D2) whilst working at Gillespies. As part of the brief for the study, National Grid explained that due to the length of ZF.2 being some 16.6 km, National Grid considered that the cost of undergrounding the entire section was such that it would not be feasible. National Grid stated their wish to take forward a Cotswolds VIP project that is both technically and financially viable whilst also providing the greatest benefits in terms of landscape and visual mitigation. I understand this to be the reason for the landscape and visual study of ZF.2 (CD D2).

3.11 The landscape and visual study of ZF.2 (CD D2) was high level and desk based. Overhead line sub-section ZF.2 was split into three smaller sub-sections (ZF.2(A), (B) and (C)) as illustrated in Plate 2 below. The subdivision was based on variations in the existing landscape character, to allow for appraisal of the landscape and visual impact of the route in more detail.

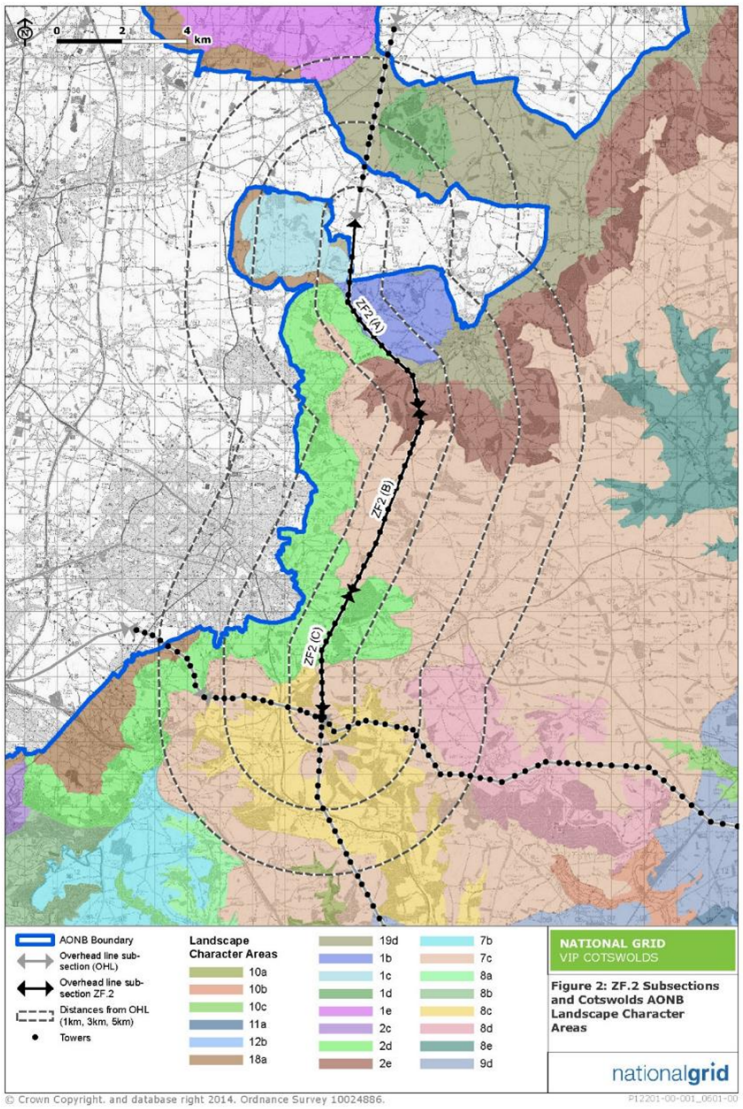


Plate 2: *Figure from landscape and visual study of ZF.2 illustrating the subdivision of ZF.2 into 3 - ZF.2(A), (B) and (C) (CD D2)*

3.12 The conclusion and recommendation of the landscape and visual study of ZF.2 (CD D2) was that National Grid should consider undergrounding the central subsection ZF.2(B). This is because the removal of this central section of ZF.2 will result in the most significant visual benefits to the widest range of visual receptors including those identified in the LVA[3] (CD D5.1), as follows:

3.12.1 people visiting Cleeve Common, Cleeve Hill promoted viewpoint, Belas Knap Long Barrow (English Heritage Long Barrow and Scheduled Monument), Longbarrow Bank open access land, Sudeley Castle and Gardens and Kilkenny Nature Reserve and open access land;

[3] As discussed in Sections 6 and 7 of the LVA (CD D5.1) and illustrated on Figures 4 and 5 of the LVA (CD D5.7)

3.12.2 people walking and travelling along the Cotswold Way National Trail and long distance footpaths including the Winchcombe Way, Windrush Way, Warden's Way, Cheltenham Circular Footpath;

3.12.3 equestrians and people walking and travelling along the Sabrina Way (part of the National Bridleroute Network);

3.12.4 people living and moving within and around scattered community and road network.

3.13 The central subsection ZF.2(B) falls almost entirely within 7C: Cotswolds High Wold Plateau Landscape Character Area (LCA), as identified in The Cotswolds AONB Landscape Character Assessment (LCA), 2004 (CD D19). The existing pylons crossing this plateau are often viewed fully against the skyline due to the combination of flatter topography, relatively fewer trees and frequency of large scale arable fields. The Cotswolds AONB LCA (CD D19) notes that pylon lines are "*intrusive features across this part of the High Wold, notably on the plateau to the east and south of Cheltenham.*"

4. LANDSCAPE AND VISUAL APPRAISAL METHODOLOGY

4.1 As set out in the evidence of Mr Juan Murray, the Project was not subject to Environmental Impact Assessment (EIA) Regulations (2017) and therefore did not require a Landscape and Visual Impact Assessment (LVIA). A Landscape and Visual Appraisal (LVA) (CD D5) was produced to support the planning applications for the Whittington (southern) and Winchcombe (northern) Cable Sealing End Compounds ("**CSEC**s").

4.2 For ease of navigation of the Core Documents the LVA has been included as a whole document and also as separate documents as listed below:

4.2.1 Cotswolds VIP Project Landscape and Visual Appraisal (May 2024) (CD D5)

4.2.2 Cotswolds VIP Project Landscape and Visual Appraisal – Main Report (CD D5.1)

4.2.3 Cotswolds VIP Project Landscape and Visual Appraisal - Appendix A - Appraisal Methodology (CD D5.2)

4.2.4 Cotswolds VIP Project Landscape and Visual Appraisal - Appendix B-ZTV and Visualisation Methodology (CD D5.3)

4.2.5 Cotswolds VIP Project Landscape and Visual Appraisal - Appendix C-Landscape Appraisal Tables (CD D5.4)

4.2.6 Cotswolds VIP Project Landscape and Visual Appraisal - Appendix D-Visual Appraisal Tables (CD D5.5)

4.2.7 Cotswolds VIP Project Landscape and Visual Appraisal - Appendix E-Proposed Approach to LVA (CD D5.6)

4.2.8 Cotswolds VIP Project Landscape and Visual Appraisal - Appendix F- Figures (CD D5.7)

4.2.9 Cotswolds VIP Project Landscape and Visual Appraisal – Appendix G – Viewpoints (CD D5.8)

4.3 The LVA follows the principles and processes of an LVIA in assessing landscape and visual effects, but given it was not EIA development, it was not required to report on the 'significance' of each effect, in EIA terms. The methodology is fully explained within Appendix A of the LVA (CD D5.2) and is summarised below.

4.4 The submitted LVA (CD D5) follows a clear and documented methodology included in Appendix A (CD D5.2). The LVA identifies and assess the potential for landscape and visual effects arising as a result of the Project. The landscape and visual effects were identified by applying professional judgement within an evidence-based appraisal process.

4.5 The evidence-based appraisal process was informed by the 'Guidelines for Landscape and Visual Impact Assessment' (Third Edition) hereafter referred to as GLVIA3 (CD D23). This guidance document is supported by Landscape Institute Technical Guidance Note (TGN) 2024-01 'The Notes and Clarifications on Aspects of Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA3) (CD 29).

4.6 In accordance with GLVIA3 (CD D23), the LVA considers landscape and visual effects separately. The LVA assesses the effect of the Project upon landscape and visual receptors during both construction and operational phases. For the operational phase, effects on receptors were assessed at Year 0 when the scheme is complete, and at Year 15 when any proposed planting is assumed to have reached a height to provide landscape and visual mitigation.

4.7 Judgements relating to landscape and visual effects requires consideration of the nature of the landscape or visual receptor (sensitivity) combined with the nature of the effect upon that receptor (magnitude).

4.8 In accordance with GLVIA3 (CD D23) sensitivity for both landscape and visual receptors is determined through judgements relating to susceptibility and value whilst magnitude is determined through judgements relating to the scale of change, the geographical extent of the receptor affected by the change, the duration of the effect and the reversibility of the effect. All judgements are considered together to provide an overall profile of each identified effect. An overview was then taken of the distribution of judgements for each aspect to make an informed professional appraisal of the overall level of effect. Diagram 1 below demonstrates graphically how the judgements are combined to reflect an overall level of effect.

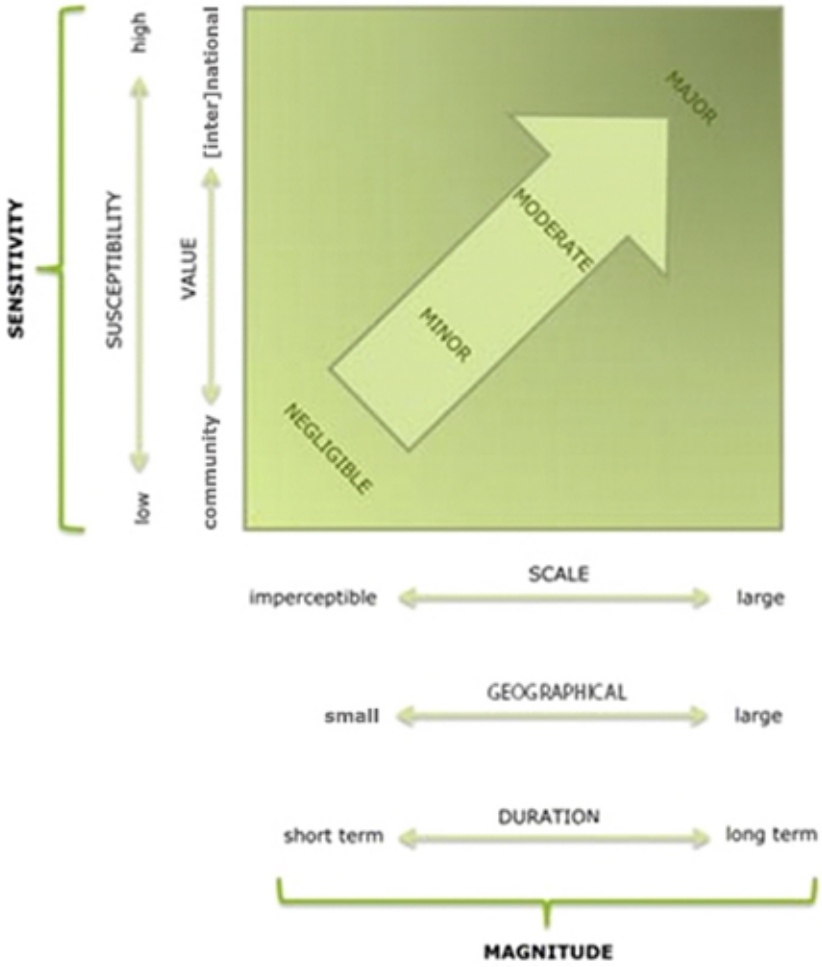


***Diagram 1**: Combining judgements to inform the overall level of effect (also provided in Appendix A of the submitted LVA (CD D5.2)*

4.9 Thresholds for each judgement component were clearly identified within the LVA methodology (CD D5.2) to ensure consistency of approach.

4.10 The overall level of effect (Major, Major-Moderate[4], Moderate, Moderate-Minor[5], Minor and Negligible) was recorded for each landscape and visual receptor. This is in accordance with GLVIA3 (para. 3.34 of CD D23).

4.11 The direction of landscape or visual effect (beneficial, adverse or neutral) was also reported in the submitted LVA (CD D5). In landscape terms, a beneficial effect provides a positive outcome for the landscape receptor, an adverse effect provides a negative outcome for the landscape receptor, and a neutral effect is one which has neither an adverse nor a beneficial effect, in accordance with GLVIA3 (para. 5.37 of CD D23). Within the LVA (CD D5) decisions on direction of effect were determined by considering how much the Project fits with the existing landscape character, or the contribution the Project makes to the landscape in its own right by virtue of good design. In visual amenity terms, the direction of effect was

[4] The term 'Major-Moderate' is interchangeable with 'Moderate to Major'

[5] The term 'Moderate-Minor' is interchangeable with 'Moderate to Minor'

assessed as either beneficial, adverse or neutral, and within the LVA (CD D5) decisions on direction of effect were determined by considering how much the Project will affect the quality of the visual experience for those groups of people who will see the changes, given the nature of the existing views (para. 6.29 of GLVIA3 CD D23).

4.12 Thresholds associated with the overall level of landscape and visual effect were clearly identified and described within Table A.5 and Table A.9. of the submitted LVA (Appendix A CD D5.2) and relate specifically to the Project. Such thresholds have been developed, refined and tested by colleagues at LUC through multiple LVIA and LVA projects of various types and scales.

4.13 As an example, in the submitted LVA (CD D5), a Major landscape effect is expected where the Project will result in an obvious change in landscape characteristics and character, and is likely to affect a landscape with a moderate or high susceptibility to that type of change, and / or to affect a nationally valued landscape. The effect is likely to be long term and affect a relatively large area. This was the case for LCA 7C: Cotswolds High Wold Plateau, at Year 15, where a Major Beneficial effect was reported.

4.14 In the submitted LVA (CD D5), a Major visual effect is expected where the Project will result in an obvious change in the view, and is likely to affect a visual receptor with a high susceptibility to that type of change, and / or affect a valued view. The effect is likely to be long term and affect a relatively large part of the receptor or affect a large number of people. This was the case for Users of the Cotswold Way National Trail – Winchcombe to Cleeve Common, at the Construction stage, where a Major Adverse effect was reported.

4.15 For further detail on the threshold criteria for the overall level of effect for Moderate, Minor and Negligible, and the intermediaries of Major-Moderate and Moderate-Minor, please refer to Table A.5 and Table A.9. of the submitted LVA Appendix A CD D5.2).

PROJECT SCOPE

4.16 The LVA (CD D5) considered the physical changes to the landscape as well as changes in landscape character. It also considered changes to areas designated for their scenic or landscape qualities and the visual impacts of the Project, as perceived by people. All potential landscape and visual effects were examined; including those relating to construction and operation. Operational effects were assessed at year 0 in Winter to cover worst case and year 15 in Summer to give an indication of the likely effectiveness of mitigation, which includes planting.

4.17 Above-ground heritage assets were considered in the LVA (CD D5) where they contribute to landscape character and where they offer publicly accessible visitor attractions, but effects on heritage assets as receptors in their own right, are included as part of the Archaeological Statement (CD B17).

4.18 The initial study area for the LVA (CD D5.1) was set at 5 km distance from the Project. However, after review of screened Zones of Theoretical Visibility (ZTV) (please refer to Figures 5 and 6 (CD D5.7) and the methodology within Appendix B of the submitted LVA (CD D5.3)) and following site visits, the study area was reduced to 3 km. It was deemed that views of the Project beyond 3 km will not be notably affected. Following consultation with representatives from the Cotswolds National Landscape, two viewpoints were identified beyond the 3 km study area boundary and were included as part of the LVA.

4.19 The extent of the study area was based on the entirety of the Project, including the area of proposed underground cable corridor located in between the Winchcombe (northern) CSEC

and the Whittington (southern) CSEC, including the permanent access roads to each CSEC and the line of the existing OHL and pylons to be removed.

4.20 Viewpoints were selected to represent views from publicly accessible areas for the receptors identified within the LVA (Chapter 5 CD D5.1). They were used to inform the assessment of landscape and visual effects on identified receptors. The selection of viewpoints was informed by consultation with representatives from the Cotswolds National Landscape, field work and desk-based research, including consideration of public access and recreational activities within the local area, analysis of any elevated vantage points and the distribution of settlements and their subsequent views towards the Project.

4.21 The viewpoints which were selected are representative of the nature of the viewing experience (static views, views from settlements and sequential views), the view type (for example panoramas, glimpses or vistas), the viewing experiences (proximity to the Project, viewing angle and intervening screening) and types of viewers (the users experiencing such views) which may be affected by the Project. This is in accordance with GLVIA3 (para 6.20 CD D23).

4.22 A total of 25 viewpoints were selected (Chapter 5 CD D5.1), and subsequent visualisations (CD D5.8) created in accordance with Landscape Institute Technical Guidance Note (LI TGN) 06/19: Visual Representation of Development Proposals (CD D24) in order to support the LVA.

4.23 Visualisations (CD D5.8) demonstrate the removal of OHL infrastructure and woodland clearance, but do not include landscape mitigation in the form of planting, or the removal of field boundary sections to facilitate the route of the underground cabling. This approach, and the technical application of the visualisations are noted in the visualisation methodology in the submitted LVA (Appendix B CD D5.3).

5. BASELINE CONDITIONS

5.1 Baseline landscape character and visual amenity is documented as part of the Applicant's LVA (Chapter 5 CD D5.1). This was used as part of the reference point from which to formulate assessment judgements.

5.2 The submitted LVA (Chapter 5 CD D5.1) describes the site and surrounding context, providing the reader with detailed information relating to the land-use, land-cover, landscape features, topography and setting which provides an introduction to the wider landscape character.

5.3 Baseline landscape character at both a national and local level is noted in Chapter 5 of the submitted LVA (CD D5.1). Natural England has produced 159 National Character Areas (NCAs) profiles. Each NCA represents an area of distinct and recognisable character at the national scale. Their boundaries follow natural lines in the landscape, not county or district boundaries. This makes them a good framework for decision-making and planning for future change. The following NCA profiles were used to inform the landscape baseline within the submitted LVA (Chapter 5 CD D5.1):

5.3.1 NCA 107: Cotswolds (CD D25); and

5.3.2 NCA 106: Severn and Avon Vales (CD D26).

5.4 Regional and local landscape character assessments form part of the planning evidence base for both Tewkesbury Borough Council (TBC) and Cotswold District Council (CDC) and include the following reference documents:

5.4.1 The Cotswolds AONB Landscape Character Assessment, LDA on behalf of Cotswolds AONB Partnership, 2004 (Introduction CD D18); and

5.4.2 Gloucestershire Landscape Character Assessment, LDA on behalf of Gloucestershire County Council, 2006 (CD D27).

5.5 NCAs provide useful landscape context, however the regional level Cotswolds AONB Landscape Character Assessment, and local level Gloucestershire Landscape Character Assessment were used in the submitted LVA (Chapter 5 CD D5.1) as a more suitable scale framework as the basis for assessing the effects of the Project on Landscape Character.

5.6 The following landscape receptors documented in the regional and local published landscape character assessments were identified as being located within the site boundary and will experience direct effects resulting from the Project. They were subsequently included within the submitted LVA as illustrated on LVA Figure 3 (CD D5.7) an extract of which is included below in Plate 3.

5.6.1 LCA 2E: Winchcombe to Dover's Hill (CD D20);

5.6.2 LCA 7C: Cotswolds High Wold Plateau (CD D19); and

5.6.3 LCA 19D: Vale of Evesham Fringe (CD D21).

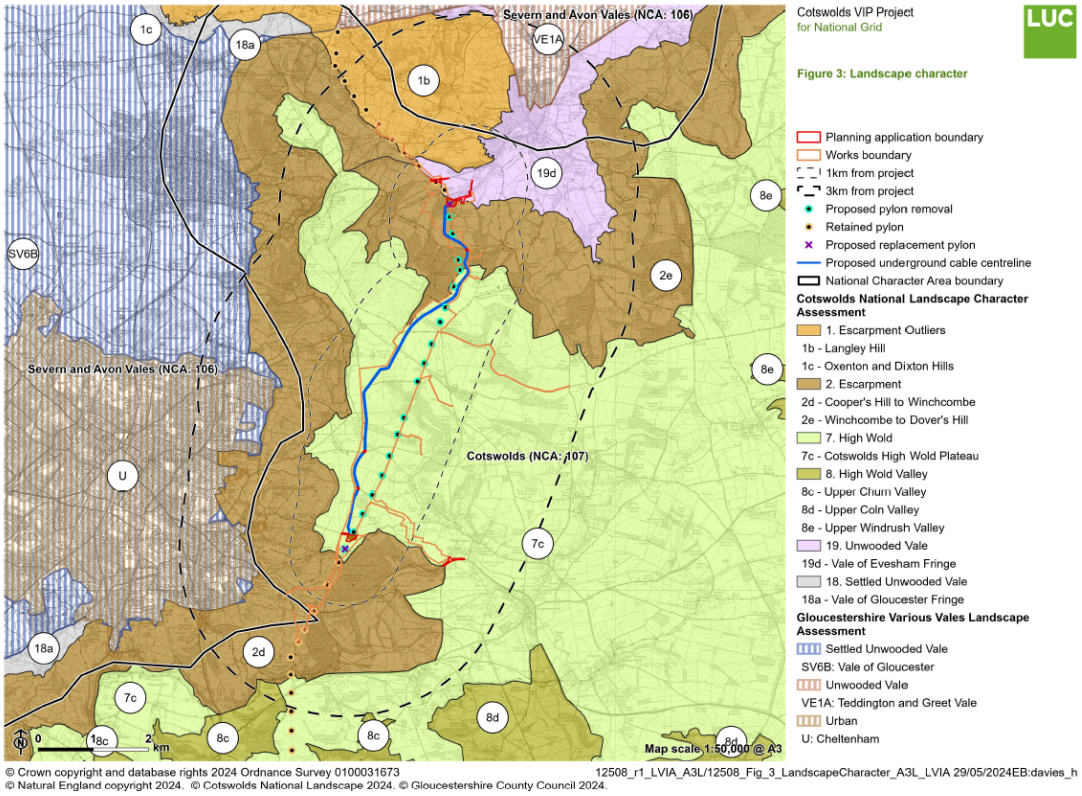


Plate 3: Figure 3 illustrating the Project in relation to published landscape character areas (CD D5.7)

5.7 The following landscape receptors documented in the regional and local published landscape character assessments were identified as being located within the 3 km study area and are likely to experience indirect effects resulting from the Project, and so were subsequently included within the submitted LVA:

5.7.1 LCA 1B: Langley Hill (CD D22);

5.7.2 LCA 2D: Cooper's Hill to Winchcombe (CD D20);

5.7.3 LCA VE 1A: Teddington and Greet Vale (CD D27); and

5.7.4 LCA SV 6B: Vale of Gloucester (CD D27).

5.8 Baseline visual amenity is noted in Chapter 5 of the submitted LVA (CD D5.1). Potential visual receptors were identified taking into consideration the visibility of the existing OHL, as defined by the screened Zones of Theoretical Visibility (ZTV) used to model visibility of the existing OHL infrastructure alongside on-site verification, bearing in mind that ZTVs indicate theoretical not actual visibility of the Project. The ZTV presented in Figure 5, Appendix B of the submitted LVA (CD D5.7) modelled the pylons whilst Figure 6, Appendix B of the submitted LVA (CD D5.7) modelled the CSECs located at Winchcombe (northern) and Whittington (southern).

5.9 From the ZTV and site visits on 21st-22nd August 2023, 11th – 13th December 2023 and 13th March 2024, the following visual receptor groups were identified in the LVA (Chapter 5 CD D5.1) and taken forward into the assessment process:

Community Receptors (residents)

5.9.1 Scattered Community north of Postlip;

5.9.2 Scattered Community south-east of Postlip;

5.9.3 Scattered Community between Breakheart Plantation and West Down (part of Cleeve Common);

5.9.4 Scattered Community between West Down (part of Cleeve Common) and Arle Grove;

5.9.5 Scattered Community between Arle Grove and Dowdeswell;

5.9.6 Whittington and surrounding scattered community;

5.9.7 Upper and Lower Dowdeswell and surrounding scattered community; and

5.9.8 Scattered community on the upper slopes of Ravensgate Hill.

Recreational Receptors (people engaged in outdoor activities for recreational purposes)

5.9.9 Users of the Cotswold Way National Trail;

5.9.10 Users of the Winchcombe Way long distance path;

5.9.11 Users of the Windrush Way long distance path;

5.9.12 Users of the Wardens Way long distance path;

5.9.13 Users of public rights of way west of Winchcombe, including Winchcombe Way long distance path and Gloucestershire Way long distance path;

5.9.14 Users of the Cheltenham Circular Footpath (ZCK61 and ZCK62 only);

5.9.15 Users of Sabrina Way (National Bridleroute Network) which includes restricted byways ASM140 and ASM103;

5.9.16 Users of public right of way AWB63 located to the south east of Postlip Mill complex;

5.9.17 Users of public right of way AWB24 located north and north-east of Postlip Mill complex;

5.9.18 Users of public right of way AWB31;

5.9.19 Users of public rights of way AWB22 and AWB23 to the south-west of the Postlip Mill complex;

5.9.20 Users of bridleways KSE1 and KWH3;

5.9.21 Users of public right of way KWH19;

5.9.22 Users of public rights of way to the east, north and south-west of Lower Dowdeswell, including KD05, KD06, KD03, KD02 and KAN2;

5.9.23 Users of elevated public rights of way north of the A436, including KD022, KD026, KD018, KD019, KD020 and KD021;

5.9.24 Users of Cleeve Common, including areas of Common Land, public rights of way and golf course;

5.9.25 Users of open access land at Longbarrow Bank;

5.9.26 Visitors to Sudeley Castle and Gardens, publicly accessible Registered Park and Garden and visitor attraction;

5.9.27 Visitors to Belas Knap Long Barrow, an English Heritage visitor attraction; and

5.9.28 Visitors to the Kilkenny Nature Reserve.

People Using the Local Road Network

5.9.29 People travelling on the B4632;

5.9.30 People travelling on Langley Road;

5.9.31 People travelling on Sudeley Hill and Salt Way;

5.9.32 People travelling on Corndean Lane;

5.9.33 People travelling on the minor road south of Corndean Hall;

5.9.34 People travelling on minor roads north-west of Whittington village;

5.9.35 People travelling on Ham Road;

5.9.36 People travelling on minor roads east of Whittington village;

5.9.37 People travelling on the A40;

5.9.38 People travelling on minor roads through and east of Lower and Upper Dowdeswell; and

5.9.39 People travelling on the A436.

5.10 As previously noted, 25 publicly accessible viewpoints were selected through the LVA process to provide representative views for identified receptors. This is presented in Table 5.1 of the submitted LVA (CD D5.1). Viewpoint locations are shown on Figure 5 and Figure 6 of Appendix B of the LVA (CD D5.7) and the viewpoints are included in Appendix G of the LVA (CD D5.8).

5.11 Embedded landscape and visual mitigation measures are proposed during construction and operation as set out in Chapter 6 of the LVA (CD D5.1) and illustrated in Figures 7 to 12 of the LVA (CD D5.7). The embedded landscape and visual mitigation proposals seek to minimise the landscape and visual effects of the Proposed Project wherever possible and deliver long-term benefits.

6. LANDSCAPE AND VISUAL EFFECTS OF THE PROJECT

6.1 The landscape and visual effects identified at different phases (construction and operation) of the project[6] are available in Chapter 7 and Chapter 8 of the submitted LVA (CD D5.1) and are summarised below.

Construction Phase

6.2 Chapter 7 of the LVA (CD D5.1) reports that there will be temporary adverse effects on the landscape character and landscape resource associated with the Site. This is predominantly due to the undergrounding works required to facilitate the removal of pylons from the Cotswold National Landscape. Despite the temporary nature of the works there will be direct, short-term **Moderate to Major adverse** landscape effects upon **LCA 7C: Cotswolds High Wold Plateau** as a result of the Project, with effects being reversible, with the exception of tree removal within Warrens Farm plantation. The effects will arise, due the high sensitivity of LCA 7C, the extent of the works across the LCA and the open nature of the plateau.

6.3 In addition, **Moderate adverse**, direct, short-term landscape effects will occur upon **LCA 2E: Winchcombe to Dover's Hill** due to construction activity within the LCA, with effects being reversible, with the exception of tree removal within Breakheart Plantation. There will be **Minor adverse** indirect effects upon **LCA 1B: Langley Hill** and **LCA 2D: Cooper's Hill to Winchcombe** due to the perception of construction activity in views from opposing valleys.

6.4 **Minor adverse** direct effects upon the landscape character of **LCA 19D: Vale of Evesham Fringe** will also occur as a result of the construction of a permanent access road to the

[6] The effects reported in the LVA take into consideration the embedded mitigation set out in Chapter 6 of the LVA (CD D5.1) and illustrated in Figures 7 to 12 of the LVA (CD D5.7)

Winchcombe (northern) CSEC and the perception of the construction of the CSEC and associated working areas.

6.5 It is recognised that effects of construction upon landscape character will be predominantly temporary in nature and reversible and will affect limited parts of each LCA. Adverse landscape effects do not extend beyond the 3 km study area.

6.6 Chapter 8 of the LVA (CD D5.1) reports that there will be some adverse visual effects during the construction period upon identified visual receptors. Due to the proximity of works associated with the underground cable route and the removal of vegetation within Breakheart Plantation, temporary, short term and reversible **Moderate to Major adverse** visual effects will occur upon **scattered communities to the south-east of Postlip** and between **Breakheart Plantation and West Down**. Effects of the installation of underground cables will be limited due to the phased approach to excavation and installation of the cables.

6.7 Due to the proximity of construction works associated with the Whittington (southern) CSEC and underground cable route, the **scattered community between Arle Grove and Dowdeswell** will experience some temporary, short-term **Moderate adverse** visual effects.

6.8 **All other visual effects** during construction from community receptors will be **Moderate to Minor adverse or lower**.

6.9 Temporary **Moderate** and **Moderate to Major adverse** visual effects will occur along the **Cotswold Way National Trail** where the undergrounding of the cables is located adjacent to the route, as well as where it lies adjacent to construction of the Whittington (southern) CSEC. However, these adverse visual effects will be limited to short lengths of the trail. Similar adverse effects will occur along limited lengths of the **Winchcombe Way long distance path** as a result of construction activity. Whilst adverse effects are predicted upon these routes, they represent a worst case scenario. The phased nature of the undergrounding of the cables will in fact limit the adverse effects to short periods of time.

6.10 Due to a number of public rights of way ("**PRoW**") requiring temporary diversion due to works associated with the installation of underground cable infrastructure, temporary **Moderate to Major adverse** effects are predicted during construction for users of **Sabrina Way**.

6.11 A number of neighbouring public rights of way will be affected by the temporary construction works associated with the construction of the Winchcombe (northern) CSEC. This is mainly due to the proximity of footpath / bridleway users to construction activity. In a number of cases, these routes will need to be diverted temporarily to facilitate installation of the underground cables.

6.12 Temporary **Major**[7] or **Moderate to Major adverse** effects are predicted upon people walking along PRoW Ref. **AWB63** and **AWB31**. The phased nature of the installation of underground cables will limit the adverse effects to relatively short durations. In some cases, only short lengths of the public footpaths will be adversely affected by construction activity, with most of the route remaining unaffected. Therefore, the extent of adverse effects upon these public rights of way will be limited and localised.

[7] I note this was mistakenly reported in Paragraph 8.9 of the LVA main body text as 'Major or Moderate to Major adverse'. It should have been 'Moderate to Major adverse' as reported in Table 8.1 of the LVA and Table D.19 and D.22 of the Appendix D of the LVA

6.13 Due to the inclusion of temporary haul roads accessing the Winchcombe (northern) CSEC some views from **local public rights of way** will be adversely affected, resulting in a **Moderate** level of effect.

6.14 **Elevated public rights of way to the west of Winchcombe** will have views towards construction activity from the opposing valley, therefore, a temporary **Moderate adverse** visual effect is predicted.

6.15 Although a **Major adverse** visual effect is predicted from **Cleeve Common**, this will be limited to south-eastern areas of the common, with areas further to the north-west only glimpsing construction activities. **Moderate to Major adverse** effects to public right of way **KWH19** will occur due to the proximity of the Whittington (southern) CSEC to the route.

6.16 **All other visual effects** during construction from recreational receptors will be **Moderate to Minor or lower**.

6.17 Receptors using the **minor dead-end road south of Corndean Hall** will experience **Moderate to Major adverse** visual effects during construction due to the undergrounding of the cables either side of the road and the removal of vegetation within Breakheart Plantation. However, the phased nature of the undergrounding of the cables will limit the adverse effects of the cable undergrounding to short durations.

6.18 The underground cabling route crosses a number of roads within the study area, including **Ham Road** and those to the **north-west of Whittington village**. As a result of construction activity, sections of vegetation and other boundaries including dry-stone walls will be removed on either side. Clearance works will also enable clear and unobstructed views towards construction activity, resulting in temporary **Moderate to Major** visual effects during construction.

6.19 **All other visual effects during construction on road receptors will be Minor or less**.

Operational Phase

6.20 Chapter 7 of the LVA (CD D5.1) reports that during operation of the Project, most of the landscape effects will be beneficial and will occur due to the removal of OHL and associated pylons and the reinstatement of land affected during construction. This will include reinstatement of the cable swathe and temporary access roads. There will be some localised adverse impacts upon landscape character as a result of the introduction of the CSEC, permanent access tracks and two replacement pylons. However, these effects will be limited and localised when compared to the effect of the existing pylons in the baseline scenario and the landscape benefits associated with removing them.

6.21 Overall, direct and indirect effects upon landscape character at operation will be beneficial or neutral in nature. The greatest benefit to landscape character will be in relation to LCA 7C: Cotswolds High Wold Plateau, where the existing pylons crossing the plateau will be removed. This will result in a Moderate to Major beneficial effect at Year 0. With proposed mitigation planting maturing, particularly surrounding the Whittington (southern) CSEC, this level of effect will increase to Major beneficial at Year 15.

6.22 Within LCA 2E: Winchcombe to Dover's Hill there will be some Minor beneficial effects as a result of the removal of a number of pylons, balanced alongside the removal of vegetation at Breakheart Plantation and the presence of the Winchcombe (northern) CSEC and replacement pylon at Year 0 of operation. As proposed mitigation planting surrounding the CSEC and

within Breakheart Plantation matures, this will enhance key features of the LCA. A Moderate beneficial level of effect is assessed for the LCA at Year 15.

6.23 There will be indirect Minor beneficial effects upon landscape character during operation at Year 0 as a result to all other LCAs within the Cotswolds National Landscape. In the longer-term at Year 15, these beneficial effects will increase to the intermediary category of Moderate to Minor as a result of the proposed landscape mitigation surrounding CSECs maturing and field boundary hedgerows becoming fully established. Those LCAs outside the Cotswolds National Landscape will experience neutral or beneficial effects in the long-term due to the distance of these character areas from the site.

6.24 Chapter 8 of the LVA (CD D5.1) reports notable **beneficial** visual effects for local communities and local recreational routes close to the Project as a result of the removal of existing pylons and OHL crossing the landscape. There will be some localised **adverse** impacts upon visual receptors as a result of the introduction of the CSECs, permanent access tracks and new pylons. This is particularly relevant to the public rights of way in proximity to the CSECs and new pylons. However, these adverse visual effects will be limited and localised, particularly when balanced with the beneficial effects associated with the removal of the existing pylons and OHL.

6.25 Due to the removal of the existing pylons, most communities are predicted to experience long-term **beneficial** visual effects. Most notable benefits are to those **properties closest to the existing pylons**.

6.26 In the longer-term at **Year 15, scattered communities south-east of Postlip** and **between Breakheart Plantation and West Down**, will experience **Moderate to Major** visual **benefits**. This is predominantly due to the removal of pylon and OHL infrastructure within views.

6.27 Some **adverse** visual effects are reported upon those communities closest to the proposed CSECs at **Year 0** However, over time, at **Year 15**, the proposed landscape mitigation surrounding the CSECs will be maturing, helping to filter and soften direct views towards the infrastructure. All visual effects upon communities are predicted to be **beneficial** in the long-term.

6.28 Effects upon recreational receptors during the operational phase of the Project are predicted to be **beneficial**. This is due to the removal of the existing pylons. Most notably, **Moderate** and **Moderate to Major beneficial** long term visual effects are predicted from **Sabrina Way, Winchcombe Way** and parts of the **Cotswold Way National Trail** at both **Year 0** and **Year 15**. Long-term beneficial visual effects are also predicted for users of **Cleeve Common, visitors to Belas Knap**, as well as users of **numerous recreational routes crossing the Cotswolds National Landscape**.

6.29 Overall, the Project will provide several **visual benefits** to **users of the Cotswolds National Landscape**. There will be two **Moderate to Major adverse** visual effects at **Year 0** from PRoW, including Ref. **AWB63** which lies adjacent to the Winchcombe (northern) CSEC and Ref. **KWH19** which lies adjacent to the Whittington (southern) CSEC. Due to the proximity of these two routes to the CSECs, the adverse effects will be unavoidable in the short-term (**Year 0**). However, with the benefit of proposed landscape mitigation surrounding each of the CSECs maturing, a **Moderate to Minor adverse** visual effect is predicted at **Year 15**. Similarly, due to the proximity of the **Cotswold Way National Trail** to the CESC infrastructure between Ham Road and Dowdeswell Wood, users will experience some long-term **adverse** effects on views, noting that this will be along a limited stretch of the long distance route.

6.30 Most visual effects upon people travelling along **local roads** during operation will be **beneficial**. However, some long term **Minor adverse** visual effects will remain at **Year 15** along limited parts of Ham Road. This is due to the proximity to the Whittington (southern) CSEC and glimpsed views from Ham Road through maturing mitigation planting.

6.31 All information pertaining to construction and operational phase landscape character effects are summarised within Table 7.1 of the submitted LVA (CD D5.1).

6.32 All information pertaining to construction and operational phase visual amenity effects are summarised within Table 8.1 of the submitted LVA (CD D5.1).

Implications on special qualities of the Cotswolds National Landscape

6.33 Chapter 9 of the LVA (CD D5.1) considers how the Project may affect the special qualities (or natural beauty[8]) of the Cotswolds National Landscape during construction and operation.

6.34 During construction the Project may adversely affect the following 8 out of 14 special qualities over a temporary period, within a limited and localised area of the designation, and the majority of construction effects will be reversible:

6.34.1 *"The Cotswold escarpment, including views from and to the National Landscape;*

6.34.2 *The high wolds – a large open, elevated predominately arable landscape with commons, 'big' skies and long-distance views;*

6.34.3 *Distinctive dry stone walls;*

6.34.4 *Flower-rich grasslands including floodplain meadows and neutral grasslands and particularly limestone grasslands;*

6.34.5 *The tranquillity of the area, away from major sources of inappropriate noise, development, visual clutter and pollution;*

6.34.6 *Extensive dark sky areas;*

6.34.7 *An accessible landscape for quiet recreation for both rural and urban users, with numerous walking and riding routes, including the Cotswold Way National Trail;*

6.34.8 *Significant archaeological, prehistoric and historic associations dating back 6,000 years, including Neolithic stone monuments, ancient drove roads, Iron Age forts, Roman villas, ridge and furrow fields, medieval wool churches and country estates and parks"*

6.35 During operation, the Project will permanently conserve, enhance or notably enhance the following 9 out of 14 special qualities:

6.35.1 *"The Cotswold escarpment, including views from and to the National Landscape;*

6.35.2 *The high wolds – a large open, elevated predominately arable landscape with commons, 'big' skies and long-distance views;*

[8] The aspects of natural beauty for which the Cotswolds National Landscape was designated can be summarised as the 'special qualities' of the area.

6.35.3 Distinctive dry stone walls;

6.35.4 Flower-rich grasslands including floodplain meadows and neutral grasslands and particularly limestone grasslands;

6.35.5 Variations in the colour of the stone from one part of the National Landscape to another which add a vital element of local distinctiveness;

6.35.6 The tranquillity of the area, away from major sources of inappropriate noise, development, visual clutter and pollution;

6.35.7 Extensive dark sky areas;

6.35.8 An accessible landscape for quiet recreation for both rural and urban users, with numerous walking and riding routes, including the Cotswold Way National Trail;

6.35.9 Significant archaeological, prehistoric and historic associations dating back 6,000 years, including Neolithic stone monuments, ancient drove roads, Iron Age forts, Roman villas, ridge and furrow fields, medieval wool churches and country estates and parks"

7. COMPLIANCE WITH POLICY AND STATUTORY DUTIES

7.1 Please also refer to the Planning Proof of Evidence prepared by Mr Juan Maurray (The Environment Partnership) for the wider planning policy context in relation to the Project. This section will address policy relevant to Landscape and Visual matters only.

7.2 NGET's visual impact provision (VIP) policy (CD D6) sets out the following guiding principles relevant to the Project in relation to landscape and visual considerations:

7.2.1 Maximise Landscape Enhancement: The primary goal is to achieve the greatest possible visual improvement to National Parks and Areas of Outstanding Natural Beauty (AONBs) using the funds allocated to the Visual Impact Provision.

7.2.2 Conserve and Enhance Natural Beauty: Projects should conserve and enhance the natural beauty, wildlife, and cultural heritage of protected landscapes.

7.2.3 Avoid Unacceptable Environmental Impacts: Mitigation projects must not cause significant adverse environmental impacts, such as harm to historical or ecological features.

Principle 1: Maximise Landscape Enhancement

7.3 The area potentially influenced by the Project is described in the baseline information presented in Section 5 of this Proof of Evidence and Chapter 5 of the submitted LVA (CD D5.1).

7.4 There will be substantial landscape and visual improvements to the Cotswolds National Landscape due to the removal of net 16 pylons and approximately 7 km of overhead line. Many recreational receptors are predicted to experience long-term benefits. The most notable beneficial long term effects are predicted from the Sabrina Way, the Winchcombe Way and parts of the Cotswold Way National Trail. Long-term beneficial visual effects are also predicted for users of Cleeve Common, visitors to Belas Knap Long Barrow, as well as users

of other numerous recreational route and footpaths crossing the Cotswolds National Landscape.

7.5 As illustrated in Figure 3 of the LVA (CD D5.7), over 5 km of transmission line, together with net 13 pylons will be removed from LCA 7C: Cotswolds High Wold Plateau to the east of Cheltenham (CD D19). This large scale open landscape is of high quality and contains many features that are representative of the special qualities of the National Landscape. The characteristic sense of remoteness and space is enhanced by the dominance of sky within the broad vistas. The Cotswolds AONB LCA (CD D19) itself notes that pylon lines are "*intrusive features across this part of the High Wold, notably on the plateau to the east and south of Cheltenham"*. The Project will significantly reduce the impact of this transmission infrastructure on the open skyline and broad vistas associated with this LCA. This will have direct benefits for the character of the landscape, through the enhancement of the sense of tranquillity and remoteness. The benefits will be tempered by the fact that pylons will remain beyond the CSECs, but these are typically lower lying and more distant and do not have such a great effect on character of LCA 7C: Cotswolds High Wold (CD D19).

7.6 As illustrated in Figure 3 of the LVA (CD D5.7), over 1 km of transmission line, together with net 3 pylons will be removed from LCA 2E: Winchcombe to Dover's Hill (CD D20). There will be removal of vegetation at Breakheart Plantation to facilitate the installation of the underground cables and the addition of the Winchcombe (northern) CSEC and associated pylon. This means that the beneficial effects on this area of escarpment will be relatively minor in the short term, but will increase in the longer term as proposed mitigation planting matures to assimilate the Project into the landscape.

Principle 2: Conserve and Enhance Natural Beauty and Avoid Unacceptable Environmental Impacts

7.7 The aspects of natural beauty for which the Cotswolds National Landscape was designated can be summarised as the 'special qualities' of the area. The special qualities of the Cotswolds National Landscape are set out in Section 4 of the Cotswolds National Landscape Management Plan 2025-30 (CD D16). This describes the Cotswolds as "a rich mosaic of historical, social, economic, cultural, geological, geomorphological and ecological features."

7.8 The effectiveness of the Project in achieving conservation and enhancement of natural beauty (or special qualities) largely reflects the landscape and visual enhancement benefits set out under Principle 1. Overall, there will be major benefits to the natural beauty of the National Landscape because of specific impacts on the special qualities relating to landscape. They can be summarised as follows:

7.8.1 **The distinctive character of the landscapes:** The removal of the sections of overhead line will bring both direct and indirect benefits for the character of the Cotswolds High Wold Plateau area of the High Wold Landscape, within the National Landscape.

7.8.2 **A sense of remoteness and tranquillity:** Tranquillity is defined partly in terms of the absence of detracting features and so the Project will generally have significant benefits in terms of enhanced tranquillity in the area around subsection ZF.2(B) due to the removal of the overhead line and pylons.

7.8.3 **Important resources that support tourism and leisure:** these include some fine cultural landscapes, notably the open access land of Cleeve Common and Belas Knap Long Barrow, and other important resources for recreation in the area including the promoted Cotswold National Trail, the Sabrina Way, the

Winchcombe Way and other routes and rights of way, all offering many opportunities for quiet enjoyment of the countryside. Users of these resources will experience the visual enhancement benefits from the Project.

7.9 The Project aims to avoid unacceptable environmental impacts, including upon ecology and cultural heritage. Mitigation measures have been identified for these topics and included within the submitted Archaeological Statement (CD B17), Ecological Impact Assessments (CD B18 and CD B19). I understand that the Archaeological Statement reports notable overall benefits for heritage assets in the area due to the removal of pylons and the Ecological Impact Assessment reports that the project will provide habitat enhancement that will deliver a Net Gain in Biodiversity in line with legislation and planning policy. Mitigation measures to minimise landscape and visual effects during construction and operation are also outlined in Chapter 6 of the LVA (CD D5.1).

Principle 3: Encourage Public Understanding and Enjoyment of the Protected Landscapes, including positive socio-economic impacts

7.10 Impacts of the Project on public understanding and enjoyment of people in the area will arise because of the removal of the overhead line and pylons within the Project boundary, and the resulting enhancement of the landscape and the way it is enjoyed by visitors. The whole of the Cotswolds National Landscape is attractive to visitors, both local people and tourists. It is promoted in many places as a place to visit and visitors are drawn by the fine landscapes, and the wealth of historic and natural features to be found in the area, as well as by the sense of tranquillity. Access to the countryside is an important contributor to enjoyment of the area.

7.11 The Cotswolds National Landscape is already an attractive place to visit, but the experience of visiting will be enhanced by the Project. The promoted loop of the Cleeve Hill Common Ring[9] or the Cleeve Common Circular, for example, will be more attractive to visitors once the project is complete and the mitigation works have matured.

Section 85 CRoW Act 2000

7.12 The objective of AONB designation is to ensure that its statutory purpose is achieved as set out in Section 82 of the CRoW Act 2000, i.e. the conservation and enhancement of an area's natural beauty. Section 85 of the CRoW Act 2000 places responsibilities on all public bodies, statutory undertakers (such as water and electricity companies including National Grid) and holders of public office to seek to further the AONB purpose when conducting functions in relation to or affecting land within the Cotswolds National Landscape (an AONB) as follows: *"Any relevant authority exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty"*. Guidance on the 'seek to further the purpose' duty is set out by the Department for Environment, Food and Rural Affairs (CD A15). It is my opinion that the landscape and visual enhancements which will be achieved by the Project's permanent removal of approximately 7 kilometres of OHL and the net removal of 16 pylons further the purpose of the Cotswolds National Landscape (an AONB).

8. OBJECTIONS MADE TO THE ORDER

8.1 At the time of writing there are four objections to the Order:

[9] This loop is not specifically referenced in the LVA. It follows a combination of the Cotswold Way National Trail, the Winchcombe Way and paths within Cleeve Common open access land all of which are assessed in the LVA (CD D5).

8.1.1 National Gas Transmission (CD C6 and CD E3)

8.1.2 Mr Ivan Drake and Mrs Ann Drake (CD C10 and CD E2)

8.1.3 John Henry Barnes & Rosemary Susan Barnes (CD C9)

8.1.4 Mr Jonathan Morton Stanley and Corinium Construction Limited (CD C7 and CD E1)

8.2 I have reviewed each of these objections to determine those relevant to my area of expertise and evidence. The objections raised by National Gas Transmission (CD C6 and CD E3) is not considered further in my proof as the grounds for objection are not relevant to my area of expertise. The remainder of this section summarises and responds to the points within the remaining three objections that I consider to be relevant to my area of expertise.

OBJECTION FROM ANN WENDY DRAKE AND IVAN LAURENCE DRAKE (CD C10)

8.3 I note the objectors Statement of Case explains that they are in favour of the aims of the Project.

8.4 The grounds for objection, as set out in the objectors Statement of Case, includes the point "*that insufficient detail has been provided by NGET to allow for [the objectors] professional advisors to assess the potential impact of the proposed project"* and that *"the land in question comprises woodland, some of which has been identified as ancient, on a steep slope and is potentially the most environmentally sensitive part of the proposed project"*.

8.5 The evidence of Mr Dave Rogerson sets out the technical detail requested by the objectors. The evidence of Ms Nicky Lear sets out how environmental matters are addressed.

8.6 The LVA (CD D5) reported that adverse visual effects of the Project during three years of construction will be temporary and reversible except for the direct replacement of trees that cannot be planted over the underground cables and the change in land use at the CSEC sites. The LVA (CD D5) considered tree removal within Breakheart Plantation. Embedded landscape and visual mitigation proposals seek to minimise the landscape and visual effects of the Project wherever possible and deliver long-term benefits. Figure 10 of the LVA (CD D5.7) presents illustrative landscape proposals within Breakheart Plantation. The aim of this is to provide a mosaic of new native woodland and scrub planting along edges and across the gap between the existing retained woodland within Breakheart Plantation, to reduce the visual gap within the woodland further and provide a woodland edge habitat for the benefit of local wildlife. Effects on landscape character during construction are set out in more detail in Chapter 7 (CD D5.1) and Appendix C (CD D5.4) of the LVA and summarised in paragraphs 6.2 to 6.5 of my evidence. The benefits of the Project on landscape character during operation are also set out in more detail in Chapter 7 (CD D5.1) and Appendix C (CD D5.4) of the LVA and these are summarised in paragraphs 6.20 to 6.23 and Section 7 of my evidence. Paragraph 6.22 of my evidence summarises the operational effects of the Project in the vicinity of Breakheart Plantation.

OBJECTION FROM JOHN HENRY BARNES & ROSEMARY SUSAN BARNES (CD C9)

Landscape Effects

8.7 I note the objectors support the aims of the Project and are in agreement with the statement of reasons at 3.3.1 *"The Cotswolds VIP Project has the potential to benefit and enhance the natural beauty of a portion of the Cotswolds National Landscape"*.

8.8 The objection raises concern and disagreement over statement of reasons paragraph 3.3.9 *"In relation to effects upon landscape character upon the site and surrounding area, there would be some temporary adverse short-term effects as a result of construction activities"*. The issue raised by the objection in relation to this point is linked to potential socio-economic effects on agricultural, shooting and leisure businesses and not landscape character. Consideration of socio-economic effects is outside my area of expertise. My expert opinion of effects on landscape character during construction is as per statement of reasons paragraph 3.3.9, which is set out in more detail in Chapter 7 (CD D5.1) and Appendix C (CD D5.4) of the LVA and summarised in paragraphs 6.2 to 6.5 of my evidence. Although there will be short term adverse impacts on landscape character during construction there will be long term substantial benefits due to the permanent removal of some 7km of overhead line and the net removal of 16 pylons from the Cotswolds National Landscape. This will greatly enhance the landscape, visual amenity and natural beauty (special qualities) of the Cotswolds National Landscape including increasing the sense of tranquillity and remoteness of LCA 7C: Cotswolds High Wold Plateau (CD D19). The benefits on landscape character during operation are set out in more detail in Chapter 7 (CD D5.1) and Appendix C (CD D5.4) of the LVA and summarised in paragraphs 6.20 to 6.23 and Section 7 of my evidence.

Visual Effects

8.9 The objection raises concerns regarding potential visual effects on holiday guests staying at a converted barn at Whalley Farm during construction. This is said to be due to vehicles using a temporary haul (access) road to the west. The concern is principally related to potential impacts on the business which is outside the scope of the landscape and visual appraisal and my area of expertise.

8.10 The objection requests mitigation measures which include the planting of "*tree screening on Whalley Farm west of the Farmhouse garden north for approximately 120m to join an existing hedge line. Semi Mature trees will be required to create the visual barrier for the converted barn to reduce visual intrusion for the holiday guests"*.

8.11 Consideration of construction effects on visual amenity is addressed in Chapter 8 (CD D5.1) and Appendix D (CD D5.5) of the LVA and dealt with in my evidence. Figure 8 of the LVA (CD D5.7) sets out the principles for vegetation replacement and protection that will be used by NGET as guidance to minimise effects during construction. This figure illustrates existing vegetation to be retained along a local road between Whalley Farm and the temporary haul (access) road to the west. This vegetation will filter views of the temporary haul (access) road from the local community to the east. Plate 4 below is an extract taken from Figure 8 which illustrates the location of Whalley Farm in relation to the closest parts of the Project.

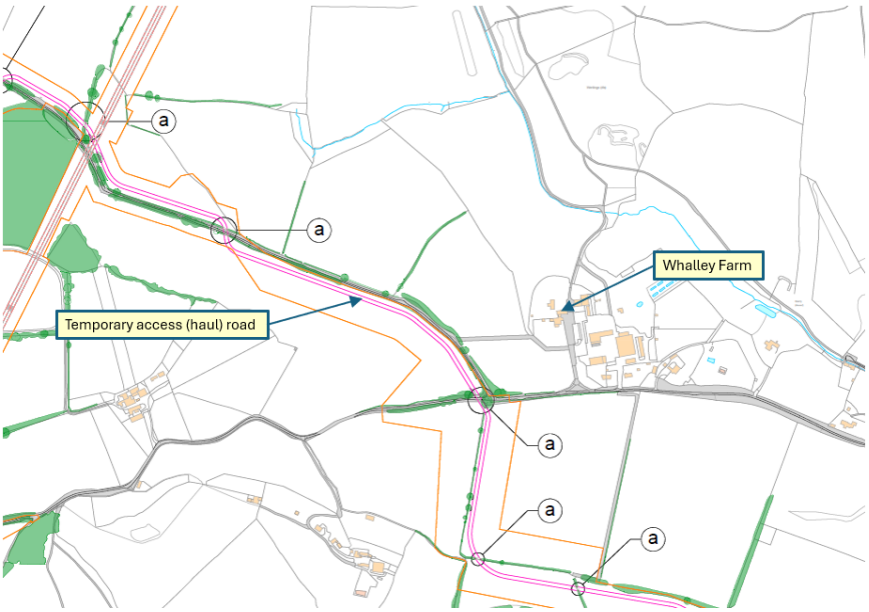


Plate 4: *Extract from LVA Figure 8 with the location of Whalley Farm and the temporary haul (access) road to the west labelled for information. Please refer to LVA Figure 8 for more information (CD D5.7).*

8.12 Table D.6 within Appendix D of the LVA (CD D5.5) reports an overall Moderate to Minor adverse visual effect on the local community in and around Whittington during construction. Impacts include the presence of construction traffic along the temporary haul (access) road in question which will be visible from some places during construction but limited by intervening field boundary hedgerows, roadside vegetation (including trees and hedgerows) and vegetation surrounding the buildings within gardens. The LVA reports overall beneficial visual effects during operation as pylons will be removed from the skyline in views from the community (including views from the holiday accommodation).

8.13 The planting of trees, as requested, would enhance the landscape by reinforcing tree cover and connecting field boundaries which would be a positive intervention. Views from Whalley Farm towards vehicles on the haul (access) road during construction would be filtered by existing vegetation along the lane to the west. I therefore do not consider it necessary to plant additional trees as requested, though I note in the evidence of Ms Nicky Lear that NGET has confirmed a willingness to consider additional mitigation works where appropriate. The consideration of tree planting along this boundary could potentially serve as part of the tree replacement strategy where trees cannot be replaced directly over underground cables.

Southern CSEC Location (Whittington CSEC)

8.14 I note the objection supports the case put forward by Mr Jonathan Morton Stanley and Corinium Construction Limited (CD C7 and CD E1) that the southern CSEC be in location S5 or S6. My response to this is within paragraphs 8.18 to 8.31 of my evidence.

OBJECTION FROM MR JONATHAN MORTON STANLEY AND CORINIUM CONSTRUCTION LIMITED (CD C7)

Landscape Effects

8.15 I note the objectors support, in principle, the Project's aim of reducing visual impact of transmission infrastructure in the Cotswolds National Landscape.

8.16 The objector's Statement of Case raises concerns that the Project and its associated works will have a significant adverse effect on the landscape and character of the objector's land (within the Cotswolds National Landscape) which they feel is likely to undermine the overall aim of the Project. I disagree with the objection that the localised effect of the southern CSEC would undermine the overall aim of the project. My expert opinion of effects on landscape character during construction is as per the Statement of Reasons paragraph 3.3.9, which is set out in more detail in Chapter 7 (CD D5.1) and Appendix C (CD D5.4) of the LVA and summarised in paragraphs 6.2 to 6.5 of my evidence. Although there will be short term adverse impacts on landscape character during construction there will be long term substantial benefits due to the permanent removal of some 7km of overhead line and the net removal of 16 pylons from the Cotswolds National Landscape. This will greatly enhance the landscape, visual amenity and natural beauty (special qualities) of the Cotswolds National Landscape. Most notably increasing the sense of tranquillity and remoteness of LCA 7C: Cotswolds High Wold Plateau (CD D19). The benefits on landscape character during operation are set out in more detail in Chapter 7 (CD D5.1) and Appendix C (CD D5.4) of the LVA and summarised in paragraphs 6.20 to 6.23 and Section 7 of my evidence.

Visual Effects

8.17 I note the objector's Statement of Case states *"the objectors support, in principle, the Project aim of reducing visual impact of transmission infrastructure in the Cotswolds National Landscape"*. I conversely note the Statement of Case also explains that the objectors *"…believe the pylons have been part of the landscape for decades, and their visual impact is less detrimental than the impact that prolonged intrusive works will have on the area."* I disagree with this latter statement. The LVA (CD D5.1) reported that adverse visual effects of the Project during three years of construction are temporary and reversible, with the exception that direct replacement of trees that cannot be planted over the underground cables and the change in land use at the CSEC sites. In my opinion these adverse effects during construction and localised adverse visual effects of the CSECs in operation are far outweighed by the overall visual benefits of the Project. As stated above in paragraph 8.16 the permanent removal of some 7 km of overhead line and the net removal of 16 pylons will greatly enhance the landscape, visual amenity and natural beauty (special qualities) of the Cotswolds National Landscape.

Southern CSEC Location (Whittington CSEC)

8.18 The objection and Statement of Case raise several points relating to concerns over the selected location for the southern CSEC at S2 and asks for evidence of NGET assessment of the options. The objectors believe the CSEC should be located within *"the most beneficial and deliverable southern end-point options (S5/S6) or the optimal southern CSEC siting (South End E vs South End F)"*.

8.19 As set out in the evidence of Mr Amardeep Malhi, NGET undertook an extensive and ongoing assessment of the relevant options between 2021 and 2025. NGET initially assessed 6 broad southern CSEC siting zone options (Options S1 to S6) and then 6 more detailed southern configuration options (South End A to South F) against multiple criteria including landscape and visual impact, health and safety management, environmental and land use impact, and engineering and construction considerations. In respect of the southern CSEC, NGET considered whether the siting of the CSEC could be located south of the A40 (Options S5/S6) and also South End E as raised by the objector. Plate 5 below illustrates the locations of Options S1 to S6.

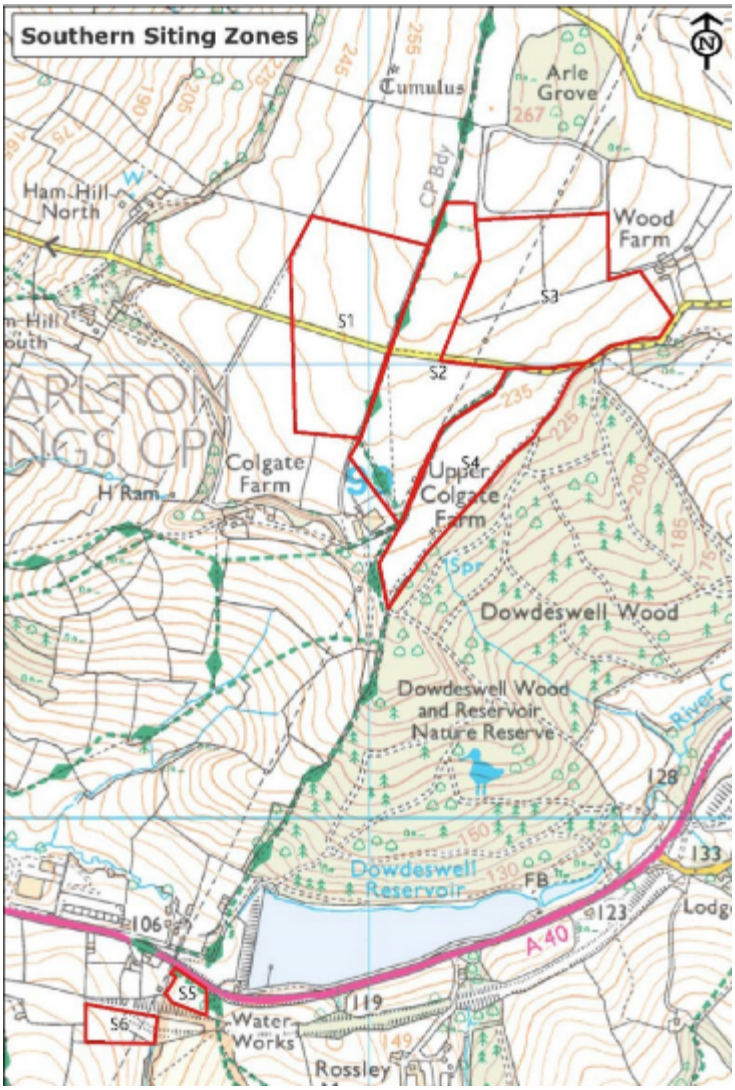


Plate 5: *Image of southern CSEC siting zones (S1 to S6) extracted from Figure 5 of the CSEC siting study* (CD D4)

8.20 As stated in paragraph 1.8.3 I undertook a landscape and visual CSEC siting study in 2021 whilst working at Gillespies (CD D4). This information fed into the NGET decision making process. The landscape and visual order of preference for the southern CSEC was reported as S6 being first preference, S3/S4 second preference and S1/S2/S5 third preference. The study judged all CSEC siting options S1 to S6 to have potential to result in some residual adverse landscape and visual effects. The below paragraphs discuss S5, S6 and S2.

Option S2 vs Options S5/S6

8.21 Whilst locations S5/S6 would present some landscape and visual benefits resulting from the removal of an additional 3 pylons there are other landscape and visual matters that need to be weighed up in the balanced decision making together with environmental, economic and technical considerations.

8.22 The removal of these additional 3 pylons, most notably the 2 lower lying pylons, would deliver less benefit than that of the net 16 pylons to be removed by the Project. This is because the lower 2 pylons are often viewed against the backcloth of vegetation and the

escarpment/valley slopes which reduces their visibility in combination with the higher frequency of tree cover in this location. The majority of pylons being removed by the Project are on the more open and elevated LCA 7C: Cotswolds High Wold Plateau. These are more highly visible and break the skyline as noted in the Cotswolds AONB LCA (CD D19) pylon lines are "*intrusive features across this part of the High Wold, notably on the plateau to the east and south of Cheltenham.*"

8.23 Option S5 is heavily constrained in terms of space for landscape and visual mitigation measures. The Cotswold Way National Trail runs directly through Option S5, meaning people walking along this nationally important route and other highly sensitive visual receptors including people living in the local community would be likely to experience significant residual visual effects from the CSEC infrastructure. People travelling along the A40 would likely have close but fleeting views as they travel past the site.

8.24 Option S6 would potentially be constrained in terms of space for landscape and visual mitigation measures. This option is less constrained than S5 in terms of visual receptors, however, there would potentially be views of a CSEC in this location from a small proportion of the local community including views from parts of the community on the upper slopes of the valley side to the north. Some views would likely be filtered by intervening vegetation.

8.25 In addition to the appraisal set out in the landscape and visual CSEC siting study (CD D4) it is worth noting a CSEC in S5/S6 would require a longer length of underground cabling. A potential route and method of installation is not known but due to the field pattern and vegetation present on the escarpment/valley sides I anticipate this would increase landscape and visual impacts during construction and operation. The installation of an additional length of underground cabling to S5/S6 would likely result in a loss of additional vegetation associated with the mosaic of narrow bands of woodland, woodland blocks, copses, hedgerows and trees that define and break up the small to medium scale fields found on the steep and undulating escarpment/ valley sides of LCA 2D: Cooper's Hill to Winchcombe (CD D20). It is not possible to judge the extent of permanent effects; however, trees cannot be planted over the underground cables therefore it is likely that some trees could not be replaced in situ.

8.26 A CSEC in S5/S6 would also need to tie into the existing overhead line to the south which may increase landscape and visual effects. Works required to connect the overhead line to a CSEC in S5 may impact tree cover as the existing pylon to the west is adjacent to woodland. A CSEC in S6 would require construction of a new pylon slightly higher up the valley which would likely be visible from the local community and the Cheltenham Circular Footpath to the west.

8.27 Whilst Option S6 was the first preference for a CSEC location in the landscape and visual CSEC siting study (CD D4), I understand that this option and Option S5 were ultimately rejected due to fundamental technical challenges relating to topography, crossings, and construction constraints.

8.28 These challenges are addressed more fully in the engineering proof of evidence of Mr Dave Rogerson; however, I note in summary these challenges include the following.

8.28.1 Topographical constraints: cables would need to ascend approximately 60 – 80 metres elevation change up the escarpment over a relatively short distance, presenting significant engineering difficulties for cable installation and long-term thermal performance.

8.28.2 Complex crossings: any cable route would require crossings beneath the A40 trunk road, the dismantled railway embankment, and the River Chelt, necessitating specialised construction techniques with substantial technical risk, cost, and programme implications that would compromise Project delivery.

8.28.3 Construction constraints: the confined nature of sites S5/S6 south of the A40 severely restricts construction access and working space, making delivery and installation of large electrical equipment extremely challenging and creating unacceptable health and safety risks during construction and raising serious concerns about long-term maintenance accessibility for the operational infrastructure.

8.29 The selected location of the CSEC in the east of Option S2 is immediately adjacent to siting zones S3 and S4 which were jointly second preference in landscape and visual terms. The CSEC is in the corner of a field in S2 which is sloping down to the south east. It is also at the furthest point from the Cotswold Way National Trail, within S2. The location of the CSEC is directly related to the existing overhead line alignment which currently influences landscape character and visual amenity and so would reduce the spread of effects of transmission infrastructure. Proposed mitigation in line with Figure 12 of the LVA (CD D5.7) will aid with filtering of views from the Cotswold Way National Trail (west of the CSEC), Ham Road (north of the CSEC) and PRoW (east of the CSEC) in the long term. The screened zone of theoretical visibility (ZTV)[10] of the southern CSEC (in S2) is presented in Figure 6 of the LVA (CD D5.7). This illustrates a relatively contained envelope of theoretical visibility of the CSEC.

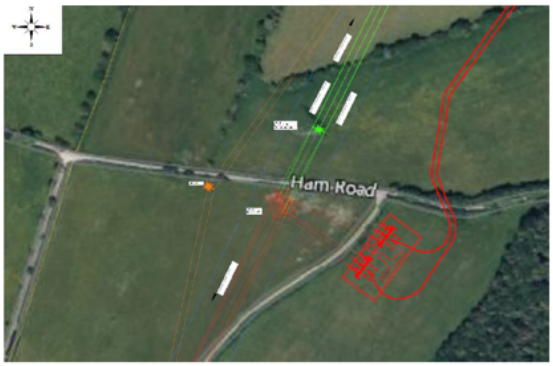
8.30 It is my opinion that the Project ending at the southern CSEC selected location (Option S2) delivers substantial landscape and visual improvements. The Project will further the purposes of the Cotswolds National Landscape by enhancing visual amenity and the natural beauty (special qualities) of the landscape through the removal of some 7km of overhead line and net 16 pylons through the National Landscape.

Option South End E vs South End F

8.31 As explained in the evidence of Mr Amardeep Malhi, I understand the selection of South End F as the preferred location for the southern CSEC resulted from an extensive assessment undertaken by NGET. I understand all 6 southern CSEC configuration options (South End A to South End F) were appraised against multiple criteria including landscape and visual impact, health and safety management, environmental and land use impact, and engineering and construction considerations. I understand South End F was selected by NGET because it provides optimal performance across these assessment criteria, particularly in avoiding positioning any new CSEC or terminal tower closer to the Cotswold Way National Trail whilst minimising engineering complexity and land use complication. In contrast, I understand that South End E was rejected despite offering marginally greater distance from the Cotswold Way National Trail this benefit was outweighed by significant disadvantages, as set out in the evidence of Amardeep Malhi. I was not involved in detailed design review meetings at this point in time of the project. I have reviewed the 2023 Baker Hicks Selection Report for OHL, UGC and CSEC Terminations (CD D28) which summarises discussions and registers the conclusions that led to the selection of CSEC location South End F. Plate 6 below illustrates the locations of South End E and South End F as set out in the Selection Report (CD D28).

[10] The screened ZTV is a map generated by computer software which shows the theoretical areas from which an existing structure or proposed development may be visible. It factors in screening elements like buildings and vegetation.

South End E



South End F

Plate 6: *Locations of South End E and South End F extracted from the Selection Report (CD D28)*

8.32 I support the preference of South End F vs South End E in terms of landscape and visual considerations for the following reasons:

8.32.1 South End E would reduce the benefits of the project by removing one less pylon from the Cotswold National Landscape (a total removal of net 15 pylons instead of net 16 pylons)

8.32.2 South End E would introduce a terminal pylon with an auxiliary crossarm adjacent to Ham Road. This pylon would be much heavier in appearance and would be more prominent and discordant in views due to both its bulkier nature and notable difference in design to the existing pylons.

9. SUMMARY AND CONCLUSION

9.1 My name is Rebecca Greatrix. I am a Chartered Member of the Landscape Institute (2005) with 23 years post-graduate experience and employed by Land Use Consultants Ltd (LUC) as an Associate Director of Landscape Planning.

9.2 I have undertaken and played a key role in Landscape and Visual Impact Assessments (LVIA) and Landscape and Visual Appraisals (LVA) for several high-profile energy infrastructure projects including National Grid Cotswolds Visual Impact Provision (VIP) ("the **Project**") (planning permission consented), the Eryri (Snowdonia) VIP Project (under construction) and the Peak District East VIP Project (project completed).

9.3 My evidence relates to landscape and visual considerations of the Project and demonstrates the substantial improvement to landscape character, visual amenity and natural beauty of the Cotswolds National Landscape[11] through the proposed removal of net 16 pylons and approximately 7km of overhead line.

9.4 Between 2014 and 2021 I contributed to assessments and reporting (CD D1, CD D2 and CD D4) that assisted National Grid in decision-making leading to the Project and the making of The National Grid Electricity Transmission ("**NGET**") Plc Cotswolds Visual Impact Provision Compulsory Purchase Order 2025 ("**CPO**").

9.5 In 2014 I was part of a team of experienced landscape architects who undertook an independent assessment of National Grid's existing overhead lines (within English and Welsh National Parks and National Landscapes). This work involved dividing up the existing overhead lines into subsections for analysis and a comparison of the level of importance of landscape and visual impact.

9.6 The Cotswolds National Landscape is crossed by five NGET overhead lines. Subsection ZF.2 of the 400kV Feckenham-Walham/Feckenham-Minety overhead line was judged to have overall combined landscape and visual impacts of high importance in 2014 (CD D1).

9.7 In 2020 I undertook a study (CD D2) which recommended NGET focus the Project on removing the central section of ZF.2 (ZF.2(B)) which would remove pylons from Landscape Character Area (LCA) 7C: Cotswolds High Wold Plateau in which pylon lines are noted as "*intrusive features across this part of the High Wold, notably on the plateau to the east and south of Cheltenham.*" (CD D19). In the brief for the study, NGET explained that due to the length of ZF.2 being some 16.6 km, the cost of undergrounding the entire section would make it infeasible and that they wished to take forward a technically and financially viable project whilst also providing the greatest benefits in terms of landscape and visual mitigation. I understand this to be the reason for the landscape and visual study (CD D2) as this would result in the most significant visual benefits to the widest range of visual receptors.

9.8 In 2021 I undertook a landscape and visual appraisal of potential cable sealing end compound (CSEC) siting zone options, including consideration of Options S1 to S6 to assist NGET with decision making. The landscape and visual order of preference for the southern CSEC was S6 being first preference, S3/S4 second preference and S1/S2/S5 third preference. The study judged all CSEC siting options S1 to S6 to have potential to result in some residual adverse landscape and visual effects.

9.9 In 2024 I was directly involved in overseeing the LVA and supporting documents that formed part of the consented planning applications for the Project (CD D5, CD B14, CD B15 and CD B16).

9.10 The LVA (CD D5) considers the Project in terms of the physical changes to the landscape as well as changes in landscape character. It also considers the implications of the Project on the special qualities of the Cotswolds National Landscape, and the visual impacts of the Project, as perceived by people.

9.11 The LVA methodology (CD D5.2) is based on industry standard guidance (CD D23 and CD D29) and includes consideration of landscape and visual effects of the Project during the construction and operational phases within a defined study area of 3km. Operational effects

[11] Cotswolds National Landscape was designated as an Area of Outstanding Natural Beauty (AONB) in 1966. The aspects of natural beauty for which it was designated can be summarised as the 'special qualities' of the area, as set out in its Management Plan (CD D16).

are assessed at year 0 in Winter to cover worst case and year 15 in Summer to give an indication of the likely effectiveness of mitigation, which includes planting.

9.12 Overall landscape and visual effects are categorized as Major, Major-Moderate[12], Moderate, Moderate-Minor[13], Minor and Negligible and the direction of landscape or visual effect beneficial, adverse or neutral.

9.13 Chapter 5 of the LVA (CD D5.1) documents the landscape and visual baseline and receptors used as a reference point for undertaking the assessment.

9.14 The LVA is supported by 25 viewpoints (Figure 5 and 6 CD D5.7) selected to represent views from publicly accessible areas. Two of the viewpoints were beyond the 3km study area at the request of representatives from the Cotswolds National Landscape. Supporting visualisations (CD D5.8) demonstrate the removal of Overhead Line (OHL) infrastructure and woodland clearance, but do not include landscape mitigation in the form of planting, or the removal of field boundary sections to facilitate the route of the underground cabling. Visualisations accord with industry standard guidance (CD D24) and LVA visualisation methodology (CD D5.3).

9.15 The landscape and visual effects identified during construction and operation of the project are available in Chapter 7 and Chapter 8 of the LVA (CD D5.1). Chapter 9 of the LVA (CD D5.1) considers how the Project may affect the special qualities of the Cotswolds National Landscape during construction and operation.

9.16 The LVA (CD D5.1) reported that adverse landscape and visual effects of the Project during three years of construction are temporary and reversible except for the direct replacement of trees that cannot be planted over the underground cables and the change in land use at the CSEC sites. During construction the Project may adversely affect 8 out 14 special qualities over a temporary period, within a limited and localised area of the designation with the majority of construction effects being reversible. In my opinion these adverse effects during construction and localised adverse visual effects of the CSECs in operation are far outweighed by the overall permanent visual benefits of the Project as outlined below:

9.16.1 Over 5 km of transmission line, together with net 13 pylons will be removed from LCA 7C: Cotswolds High Wold Plateau to the east of Cheltenham. This large scale open landscape is of high quality and contains many features that are representative of the special qualities of the National Landscape. The characteristic sense of remoteness and space is enhanced by the dominance of sky within the broad vistas. The Cotswolds AONB LCA itself notes that pylon lines are "*intrusive features across this part of the High Wold, notably on the plateau to the east and south of Cheltenham*" (CD D19). The Project will significantly reduce the impact of this transmission infrastructure on the open skyline and broad vistas associated with this LCA. This will have direct benefits for the character of the landscape, through the enhancement of the sense of tranquillity and remoteness. The benefits will be tempered by the fact that pylons will remain beyond the CSECs, but these are typically lower lying and more distant and do not have such a great effect on character of LCA 7C: Cotswolds High Wold.

[12] The term 'Major-Moderate' is interchangeable with 'Moderate to Major'

[13] The term 'Moderate-Minor' is interchangeable with 'Moderate to Minor'

9.16.2 Over 1 km of transmission line, together with net 3 pylons will be removed from LCA 2E: Winchcombe to Dover's Hill (CD D20). There will be removal of vegetation at Breakheart Plantation to facilitate the installation of the underground cables and the addition of Winchcombe (northern) CSEC and associated pylon. This means that the beneficial effects on this area of escarpment will be relatively minor in the short term but will increase in the longer term as proposed mitigation planting matures to assimilate the Project into the landscape.

9.16.3 Overall, there will be substantial visual improvements due to the removal of net 16 pylons and approximately 7 km of overhead line. Many recreational receptors are predicted to experience long-term benefits. The most notable beneficial long term effects are predicted from the Sabrina Way, the Winchcombe Way and parts of the Cotswold Way National Trail. Long-term beneficial visual effects are also predicted for users of Cleeve Common, visitors to Belas Knap Long Barrow, as well as users of other numerous recreational routes and footpaths crossing the Cotswolds National Landscape.

9.16.4 The Project will further the purposes[14] of the Cotswolds National Landscape by permanently conserving, enhancing or notably enhancing 9 out of 14 special qualities, most notably "*The high wolds – a large open, elevated predominately arable landscape with commons, 'big' skies and long-distance views*" (CD D16).

9.17 I note that objectors are in favour of the aims of the project but there are requests for further information and matters of concern raised; some of which related to landscape and visual matters to which I have responded.

9.18 In relation to concerns about the selected location of the Whittington (southern) CSEC, it is my opinion that the Project ending at the selected location (Option S2, South End F) delivers substantial landscape and visual improvements. The Project will further the purposes of the Cotswolds National Landscape by enhancing visual amenity and the natural beauty (special qualities) of the landscape through the removal of some 7km of overhead line and net 16 pylons through the National Landscape.

[14] The objective of AONB designation is to ensure that its statutory purpose is achieved as set out in Section 82 of the Countryside and Rights of Way Act (CRoW) 2000, i.e. the conservation and enhancement of an area's natural beauty. Section 85 of the CRoW places responsibilities on all public bodies, statutory undertakers (such as water and electricity companies including National Grid) and holders of public office to seek to further the AONB purpose as follows: *"Any relevant authority exercising or performing any functions in relation to, or so as to affect, land in an area of outstanding natural beauty in England must seek to further the purpose of conserving and enhancing the natural beauty of the area of outstanding natural beauty"*.

10. WITNESS DECLARATION

10.1 I confirm that the evidence prepared for this Inquiry and contained within this statement of evidence are my true and professional opinions. I confirm that I have understood and complied with my duty to the Inquiry as an Expert Witness and have provided my evidence impartially and objectively. I confirm that I have no conflicts of interest.

10.2 I confirm that artificial intelligence has not been used to produce this statement of evidence.

REBECCA GREATRIX

12TH OCTOBER 2025