

REBECCA GREATRIX: LANDSCAPE AND VISUAL

PROOF OF EVIDENCE

1 SUMMARY AND CONCLUSION

- 1.1 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.
- 1.2 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).
- 1.3 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 Landscape¹ through the proposed removal of net 16 pylons and approximately 7km of overhead line.
- 1.4 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**”).
- 1.5 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.
- 1.6 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).
- 1.7 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.
- 1.8 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

¹ 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).

siting options S1 to S6 to have potential to result in some residual adverse landscape and visual effects.

- 1.9 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).
- 1.10 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.
- 1.11 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 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.
- 1.12 Overall landscape and visual effects are categorized as Major, Major-Moderate², Moderate, Moderate-Minor³, Minor and Negligible and the direction of landscape or visual effect beneficial, adverse or neutral.
- 1.13 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.
- 1.14 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).
- 1.15 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.
- 1.16 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 of 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:
- (a) 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

² The term 'Major-Moderate' is interchangeable with 'Moderate to Major'

³ The term 'Moderate-Minor' is interchangeable with 'Moderate to Minor'

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.

- (b) 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.
- (c) 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.
- (d) The Project will further the purposes⁴ 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).

- 1.17 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.
- 1.18 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.

2 WITNESS DECLARATION

- 2.1 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.
- 2.2 I confirm that artificial intelligence has not been used to produce this statement of evidence.

⁴ 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”.



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12th OCTOBER 2025