Grove Farm Solar, Bentley

Proposed Development of a Photovoltaic Solar Array on Land at Grove Farm, Bentley

PINS Ref: APP/D3505/W/25/3370515

LPA Ref: DC/23/056656

Proof of Evidence

Landscape and Visual Matters

On Behalf of the Applicant

Green Switch CAPITAL

December 2025

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1.0 INTRODUCTION AND SCOPE OF EVIDENCE

1.1 Qualifications and Relevant Experience

1.1.1 I am Jon Mason, a Director of Axis, a multi-disciplinary planning, environmental and landscape consultancy.

1.1.2 I am a Chartered Member of the Landscape Institute and hold a BSC honours degree in Landscape Design and Plant Science from the University of Sheffield as well as a Diploma in Landscape Architecture also from the University of Sheffield. I lead a team of experienced landscape architects acting on a wide range of primarily infrastructure projects throughout the UK.

1.1.3 I have been employed by AXIS since 2001 and have over thirty years of professional experience. I have extensive experience of assessment of major infrastructure projects across the UK.

1.1.4 A senior Axis colleague within my team produced the Landscape and Visual Impact Assessment (LVIA) which accompanied the original planning application. I have subsequently become involved following the refusal of the planning application.

1.1.5 I am familiar with the appeal site (the Site) and the immediate surrounding area having made a site visit on Thursday 10th April 2025.

1.1.6 The evidence which I have prepared and provide for this call-in inquiry in this proof of evidence is true and I confirm that the opinions expressed are my true and professional opinions. My professional fees in respect of this project do not depend upon the outcome of this inquiry.

1.2 Scope of Evidence

1.2.1 This Proof of Evidence (PoE) addresses matters relating to landscape character and visual amenity.

1.2.2 The planning application was refused on 6 February 2025 for two reasons, one relating to heritage and one relating to landscape. This Proof addresses the landscape reason for refusal, which is worded as follows:

The proposal would conflict with policies SP09, LP17, LP18, LP25 and consequently SP03 of the Babergh and Mid Suffolk Joint Local Plan (2023), policies BEN 3 and BEN 7 of the Bentley Neighbourhood Plan (2022) and paragraphs 187 and 189 of

the NPPF (2024). The development would introduce an incongruous, industrialised character into a valued landscape, being within the setting and Additional Project Area of the Suffolk Coast and Heaths National Landscape. The development would erode a well preserved and largely unaltered agricultural area and would infill a tranquil transitional gap between settlement and a valuable historical landscape with an abrupt, alien and jarring form of development.

1.2.3 A Statement of Common Ground ("SoCG") has been prepared between the Appellant and the LPA. It records a number of agreements relevant to landscape and visual matters. An additional topic specific SoCG is in preparation at the time of writing.

1.3 Proof of Evidence Structure

1.3.1 My evidence is divided into a number of sections which cover the following:

i) Section 2 – Site context and the Proposed Development
ii) Section 3 – Assessed baseline landscape context
iii) Section 4 – Embedded landscape design and mitigation
iv) Section 5 – Proposed amendments (post-determination)
v) Section 6 – LVIA findings
vi) Section 7 – The National Landscape and the Additional Project Area (APA)
vii) Section 8 – Valued landscapes
viii) Section 9 – What if the Landscape is "Valued"?
ix) Section 10 – Summary and conclusions

1.3.2 A summary of this evidence is provided in a separate volume (APP/JM/1).

2.0 SITE CONTEXT AND THE PROPOSED DEVELOPMENT

2.1 The Site

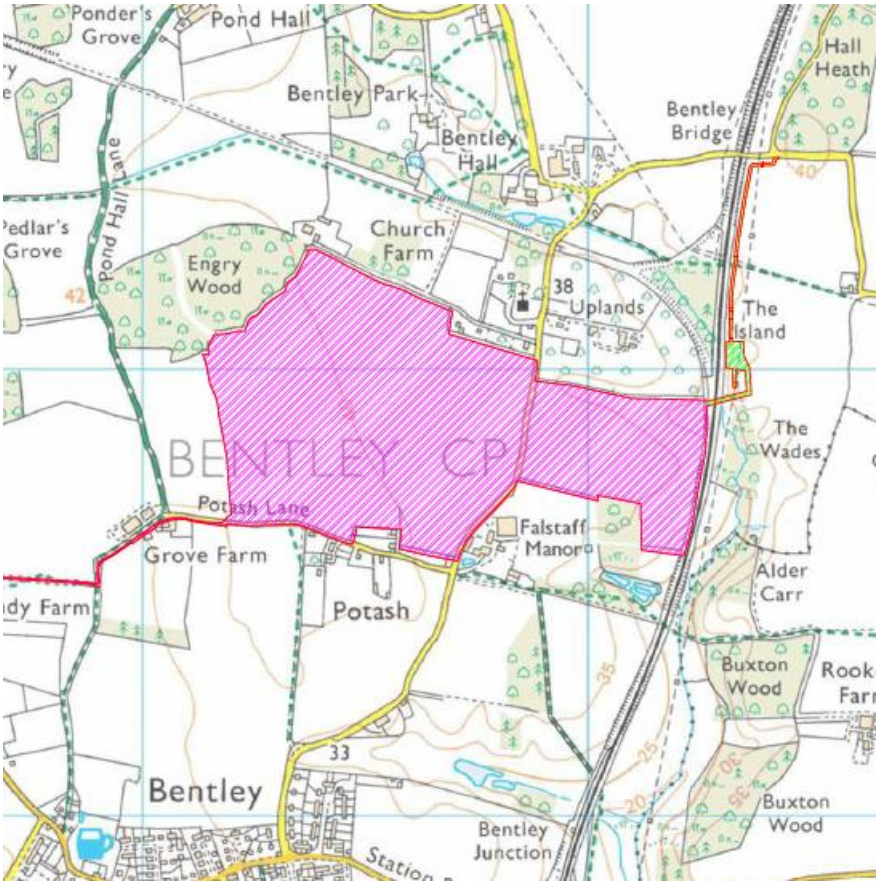
2.1.1 The Site is described in detail in both the LVIA and the SoCG.

2.1.2 In brief summary the site comprises agricultural land totalling 46.8ha to the north of Bentley within Babergh District.

2.1.3 The planning application site comprises two distinct areas: the “Main Site” and the “Substation Site”, located on either side of the Great Eastern Main Line railway.

2.1.4 The Main Site (shaded pink below) comprises two arable fields accessed via Grove Farm from Station Road, separated by Church Lane. The Substation Site (shaded green) comprises the western edge of two arable fields east of the railway line, accessed via a track from the north and connecting to a high voltage pylon identified as the point of connection.

Site Location from LVIA Figure 1 [CD: A5]



2.1.5 The application site lies within the Additional Project Area of the Suffolk & Essex Coast and Heaths National Landscape and within the Bentley Conservation Area (designated 23 April 2025).

2.2 Proposed Development description

2.2.1 The Proposed Development is described in the SoCG **[CD: C12]** and in section 2.0 of the LVIA **[CD: A4]**. In brief it consists of a solar farm of up to 40MW export capacity with ancillary infrastructure and cabling, a DNO substation, a customer substation, and new/altered vehicular accesses. The site would be enclosed by deer/stock fencing.

2.2.2 The grid connection point will be in the vicinity of a high voltage pylon adjacent to the DNO substation, with connection delivered partly by trenching and partly by horizontal directional drilling.

2.2.3 Embedding mitigation proposed includes native woodland planting, around 2.5km of hedgerow planting and 139 hedgerow trees. The ground surface within the Proposed Development will comprise grazed pasture and species rich grassland.

2.2.4 The Proposed Development would have an operational life of forty years, after which it would be decommissioned. The solar arrays, fencing, substations and access tracks would all be removed at the point of decommissioning. The proposed planting would however be retained post-decommissioning.

3.0 BASELINE LANDSCAPE CONTEXT

3.1 The surrounding landscape

3.1.1 The Site enjoys a high degree of enclosure due to the extent of woodland and mature hedgerows in field boundaries and alongside roads and footpaths. The wider landscape around the Site is characterised by a more open medium- to large-scale field pattern often with open field boundaries rather than hedgerows, which enhances a perception of openness.

3.1.2 The narrow valley to the east of the Site is characterised by blocks of woodland scrub and woodland clumps following the sinuous watercourse. Belts of mature trees and woodland also follow the alignment of the Great Eastern Main Line, and a now defunct former railway spur to the north of the Site.

3.1.3 To the north of the Site around St Mary's Church, Bentley Hall and Bentley Park there are more formal vegetation patterns that relate to historic parkland and formal gardens. These vegetation patterns create a sense of intimacy in the local landscape here and increase the perceived separation between the Site and Bentley Hall.

3.1.4 Analysis of historic mapping reveals that there has been a gradual erosion in field boundaries over the past century, and that this included the removal of all of the hedgerows within the Site. The result of these field boundary removals is the open medium-large scale field pattern that is evident today.

3.1.5 The Bentley Neighbourhood Plan Landscape Appraisal (2019) **[CD:G7]** provides further relevant baseline context in relation to landscape character, including reference to detractors including the railway, electricity pylons and noise from the A12 trunk road, all of which affect perceptions of tranquillity in parts of the area.

3.2 Landscape Character

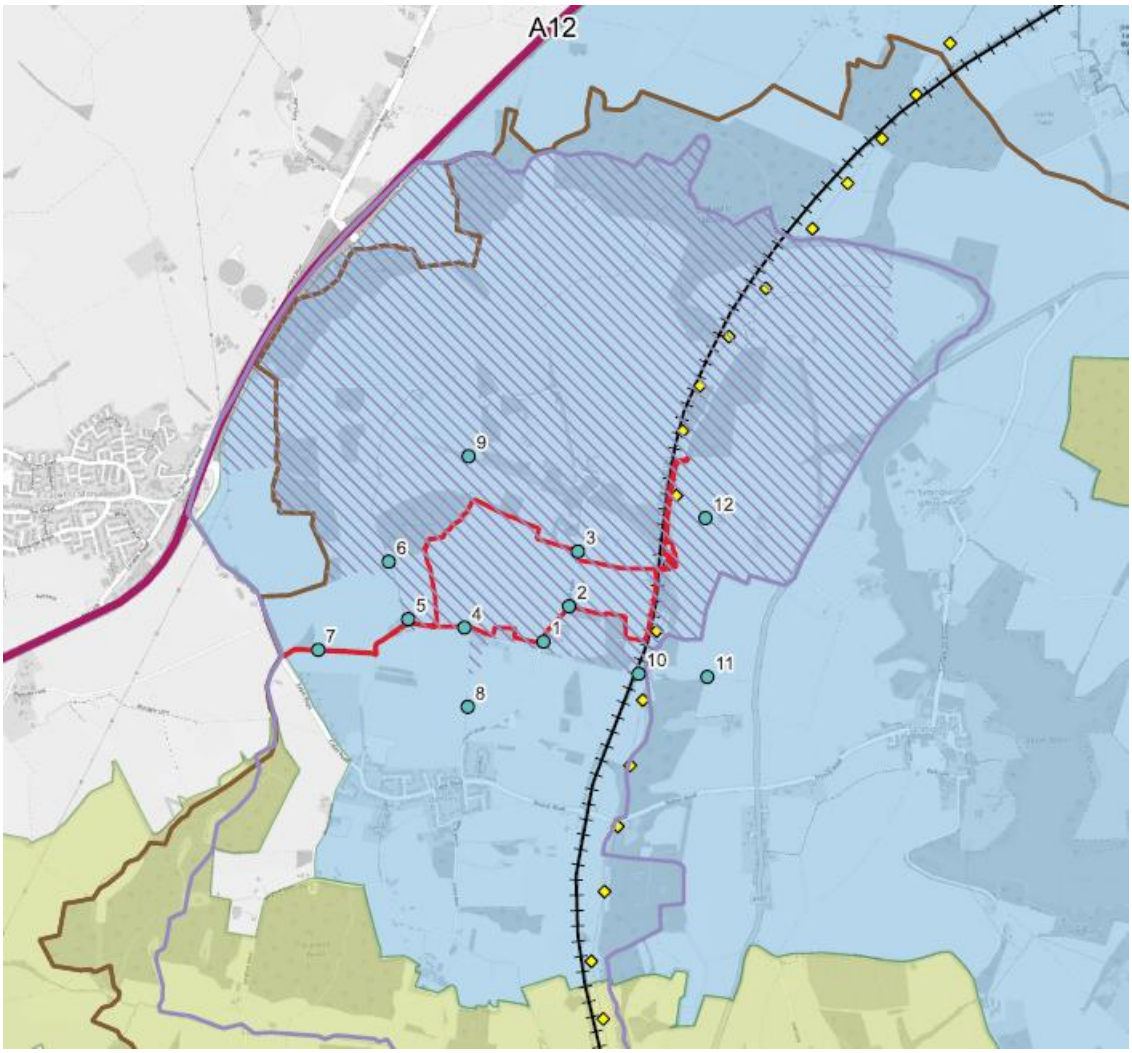
3.2.1 The landscape character assessment hierarchy that provides relevant context for the Appeal scheme is set out in detail in section 4.3 of the LVIA

3.3 Designations

3.3.1 The below illustration - an extract of my Figure JM2 illustrates the boundaries of a number of entities, understanding of which is relevant to consideration of the Appeal. None of the designations that coincide with the Site are strictly speaking extant Landscape Designations, although this is a matter of dispute between the parties.

3.3.2 The pale green shading indicates areas that fall within the Suffolk & Essex Coast and Heaths National Landscape. Pale blue shading relates to the National Landscape Additional Project Area (the APA). The former Dodnash Special Landscape Area is outlined with a brown line. The Bentley Parish Council boundary is shown in purple and the recently designated Bentley Conservation Area is hatched purple. The Site is outlined in red.

Figure JM2 Extract



National Landscape

The Suffolk & Essex Coast & Heaths National Landscape

3.3.3 The Suffolk & Essex Coast & Heaths National Landscape (the National Landscape) is a nationally designated landscape with the legal purpose to conserve and enhance natural beauty. “National Landscape” is the new name for AONBs in common usage.

The legal name remains AONB. Within my proof any references to the National Landscape or the AONB thus refer to the same entity.

3.3.4 The Suffolk & Essex Coast & Heaths National Landscape Management Plan 2023–2028 (the NL Management Plan) **[CD: E3]** fulfils the statutory duty on local authorities to adopt and publish a plan for the AONB (as outlined in section 89 of the Countryside and Rights of Way Act 2000).

3.3.5 The NL Management Plan records that the National Landscape was extended in 2020 "along the southern shore of the Stour Estuary into Essex, and the Freston and Samford Valleys in Suffolk."

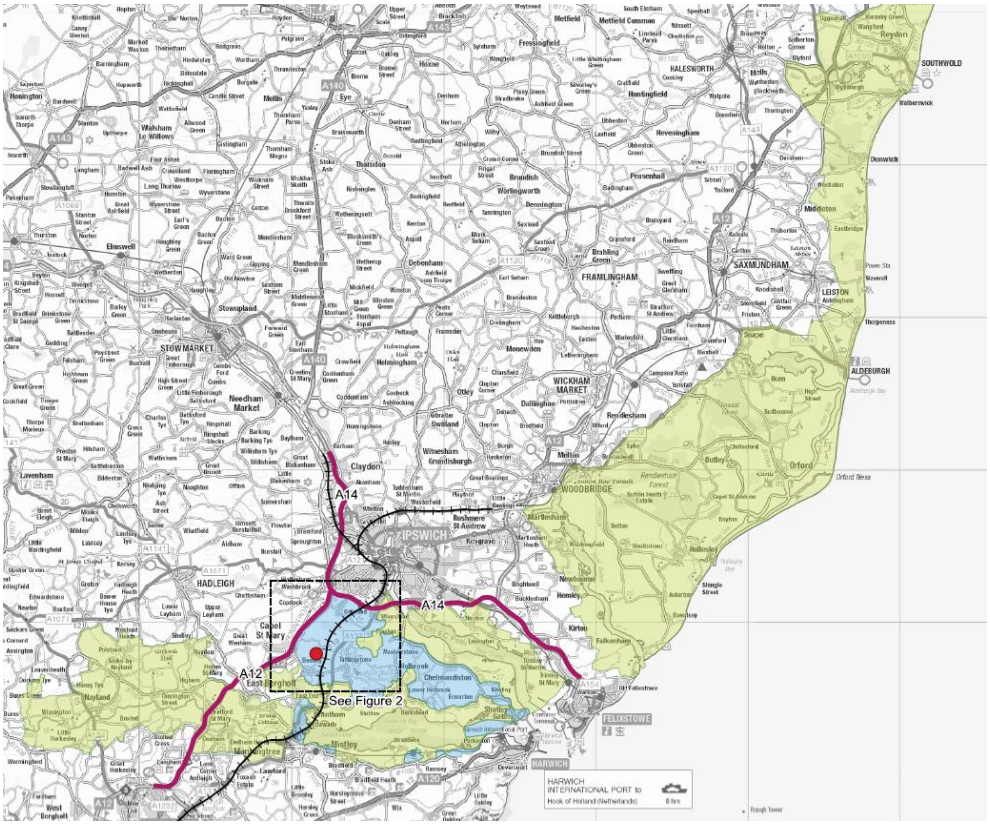
3.3.6 The NL Management Plan describes the National Landscape as follows:

The Suffolk Coast & Heaths Area of Outstanding Natural Beauty covers an area of around 170 square miles (441 square kilometres) stretching from Kessingland near Lowestoft, in the north, to Parkeston near Harwich on the southern shore of the Stour Estuary to the south. To the east the boundary is formed by the North Sea and the western boundary is largely to the east of the A12 and encompasses Suffolk's estuaries.

The character of the AONB is a product of the underlying geology and its associated natural habitats. It is shaped by the effects of the sea and the interaction with people and the landscape. It is a gently rolling landscape, with the estuaries a common and dominant feature. Where the land does rise, commanding views across the landscape are rewarding

3.3.7 The wider extent of the National Landscape, and the location of the Site are illustrated below, with the National Landscape (including the 2020 extensions) shaded pale green. The blue shading indicates the National Landscape Additional Project Area (described in more detail below), and the red dot shows the Site.

Figure JM1 Extract



The National Landscape Additional Project Area

3.3.8 As is explained in the Alison Farmer Associates' "Valued Landscape Assessment Suffolk Coast & Heaths Additional Project Area" report (2020) **[CD: G9]** the National Landscape Additional Project Area (the APA) stemmed from a long-held aspiration to extend the area designated as AONB, recognising the inter-relationship of the area with the adjoining Stour and Orwell Estuaries.

3.3.9 A degree of uncertainty surrounding the history and reasoning around proposed AONB variation in this area is expressed in section 3 of the 2017 Natural England report "Natural Beauty Assessment, Suffolk Coast and Heaths AONB **[CD: G8]**. In section 4, the anomalous nature of there being an Additional Project Area associated with an AONB is described followed by the following statement concerning its rationale:

It has not proved possible to establish clearly the rationale behind the original designation of the Additional Project Area or its boundary, (which has changed slightly over the years), however anecdotally it is thought possible locally that it reflects land which has a visual link with the estuary and land which provides a setting to the AONB.

3.3.10 The lack of an evidential basis to support inclusion of the APA as an adjunct to the National Landscape is such that the area was described as no more than a "useful starting point" for review of whether there were additional areas which merited designation.

3.3.11 Whilst it is stated in several places that there has been a history of management by the National Landscape authorities within the APA and also that the area shares similar landscape features to the National Landscape – I have not anywhere seen any evidence of which areas are meant and to what extent they had been managed. What is clear is that much of this very extensive area neither has a visual relationship with the AONB, and nor does it have an obvious other role in its setting. I will return to discussion of the APA later in my proof at Section 7.

3.3.12 Suffice it to say that I do not consider the position advanced in the current National Landscape Management Plan (2023-2028) **[CD: E3]** which is that the whole of the APA should be considered to be a Valued Landscape, is one that is supported by a body of evidence. In fact, I consider that the converse is true – there is a body of evidence which confirms that it is not.

Dodnash Special Landscape Area

3.3.13 The Dodnash Special Landscape Area (SLA) is a legacy designation. Believed to have been established in 2006 within the Babergh Local Plan **[CD: G8]** (p11) the original assessment which led to this area being designated is not available, and so even if it remained as a relevant designation, which it does not, the evidence base to support it does not exist.

Bentley Conservation Area

3.3.14 The Bentley Conservation Area was designated in 2025. This is a cultural heritage rather than a landscape designation.

4.0 LANDSCAPE DESIGN AND EMBEDDED MITIGATION

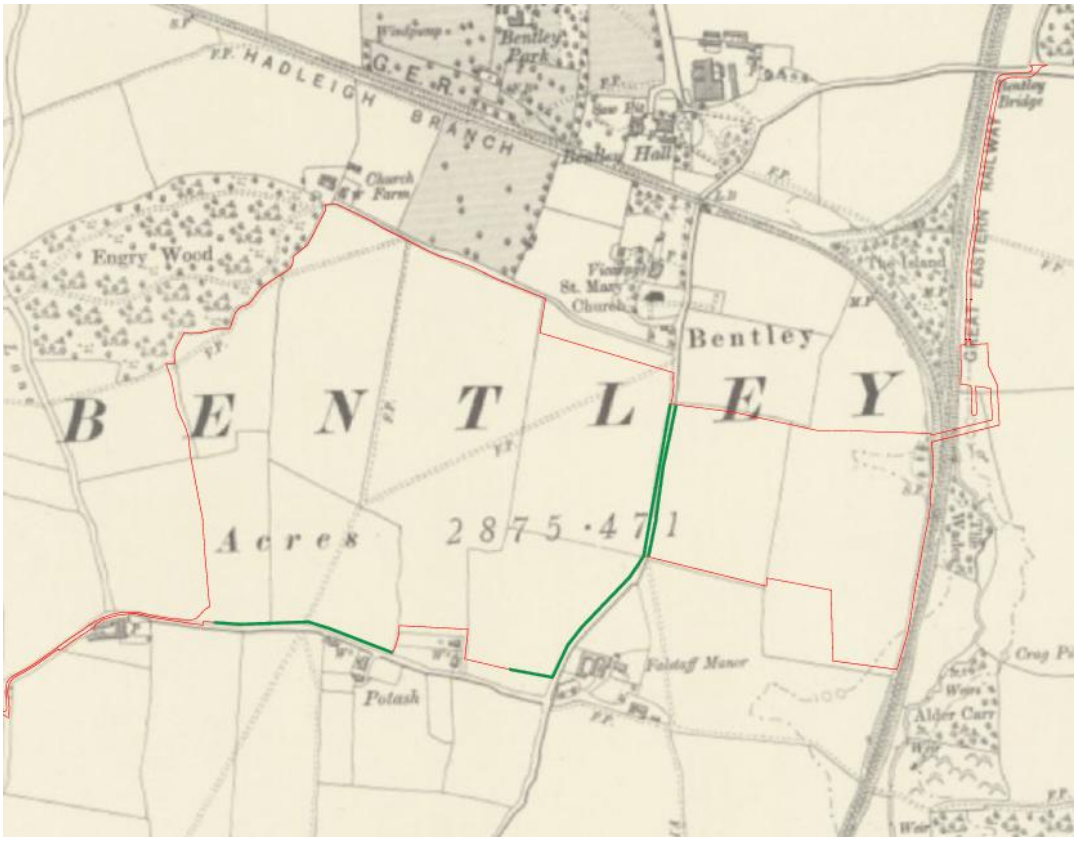
4.1 Introduction

4.1.1 The layout and design of the Proposed Development have been conceived in a manner which is landscape rather than engineering led. As a result, it can be seen to be responsive to its location and the prevailing landscape character. The originally submitted design has evolved following consultee comments prior to determination and subsequently, in advance of the appeal some further beneficial adjustments have been proposed. Whether the latter amendments (which are described fully in section 5) are to be accepted for the purposes of the appeal was at the time of writing still to be determined.

4.2 Landscape Design

4.2.1 As far as practicable all hedgerows and boundary vegetation will be retained, with predicted vegetation removal limited to localised removal around two of the access points, and at the point of connection. To ensure that the development does not conflict or impinge on retained vegetation, a minimum 6m buffer distance between the existing field boundaries and the proposed solar farm fencelines has been used. The depth of the buffer is increased in proximity to trees and boundary woodland. There will be a buffer in excess of 15m between the solar farm fenceline and the Engry Wood Ancient Woodland, and appropriate buffers to avoid the specific root protection areas of all trees in field boundaries - as informed by the Arboricultural Constraints Plans **[CD: A16]**.

4.2.2 It is very evident that the historic landscape fabric of the site has been drastically eroded by the removal of all internal field boundaries and trees. This appears to have taken place in the 1950s, resulting in the very large field units of the Main Site. The below illustration shows the site as it was mapped in 1884 – rather than the single large existing field to the north of Potash Lane there can be seen to be seven or eight smaller field units. As can be seen, the only remaining hedgerows are those along some of the boundaries adjoining roads. Footpaths shown on the historic maps have also since disappeared.



4.2.3 Some boundary hedgerows are also somewhat gappy in nature and suffering from a lack of proactive management. This is symptomatic of the landscape trends and characteristics identified in the published landscape character assessments. The character assessments advocate seeking opportunities to:

i) generate long-term landscape enhancement through extensive hedge planting schemes;
ii) reinforce the historic pattern of field boundaries and recognising these when restoring and planting hedgerows; and
iii) maintain and increase the stock of hedgerow trees.

4.3 Embedded Mitigation

4.3.1 A series of measures have been incorporated into both the design of the Proposed Development and the drawing up of the construction and operational procedures which are intended to provide embedded mitigation against potentially adverse landscape and visual effects and other environmental effects.

4.3.2 The siting of the proposed DNO substation at a low point in the landscape and in close proximity to the point of connection and the railway line. In siting the substation

in this way, the perception of electrical infrastructure within the local landscape will be minimised, due to the natural screening provided by the topography and through co-location with other infrastructure.

4.3.3 The most notable embedded mitigation is provided in the form of hedgerow planting across the site, as described below.

4.4 Layout Design

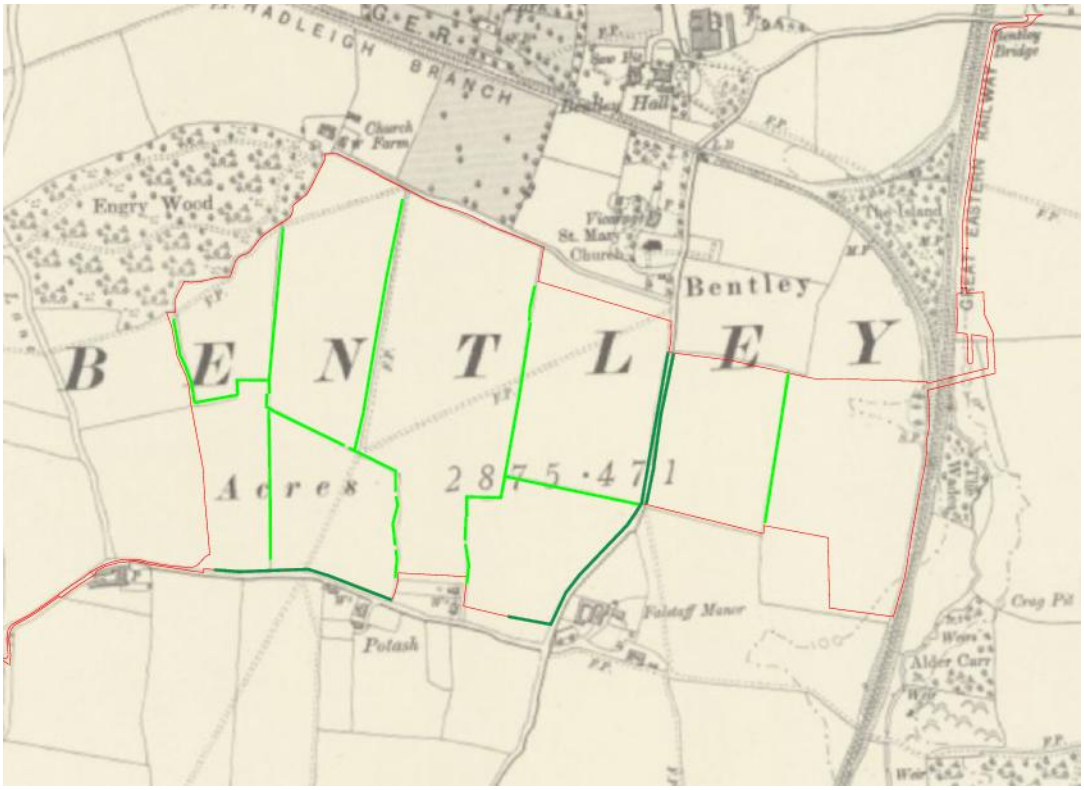
4.4.1 The layout of the Proposed Development has been guided reference to two principles:

i) Reference to historic field pattern, researched via the Suffolk Historic Landscape Characterisation and review of historic maps of the Site (available to view online via the National Library of Scotland)
ii) the need to maximise the efficiency of the solar development whilst considering long-term management post-decommissioning.

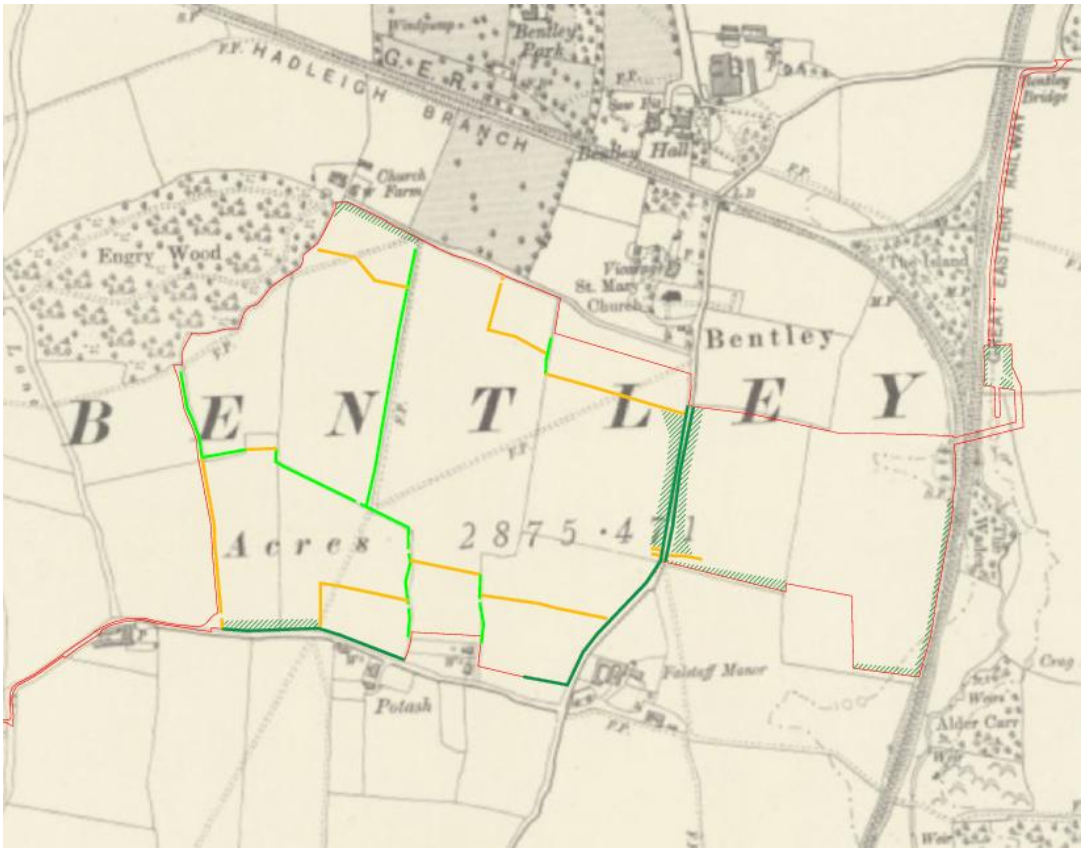
4.4.2 The resultant proposed layout of solar arrays subdivided into field parcels by hedgerows seeks to screen and break up the massing of the solar panels in the short to medium term whilst also restoring a field pattern that reflects the historic scale and pattern in the longer-term. In this way the proposals will mitigate views, improve landscape character and improve habitat connectivity with an increase in the amount of hedgerow and hedgerow tree habitats. This is intended to provide a positive legacy to the Proposed Development post decommissioning as shown on LVIA Figure 10 **[CD: A5]**.

4.4.3 The below illustrations show the historic field pattern overlaid on to the 1884 map and then the field pattern proposed in the Appeal Scheme:

Historic Hedgerow Layout



Proposed Hedgerow Layout

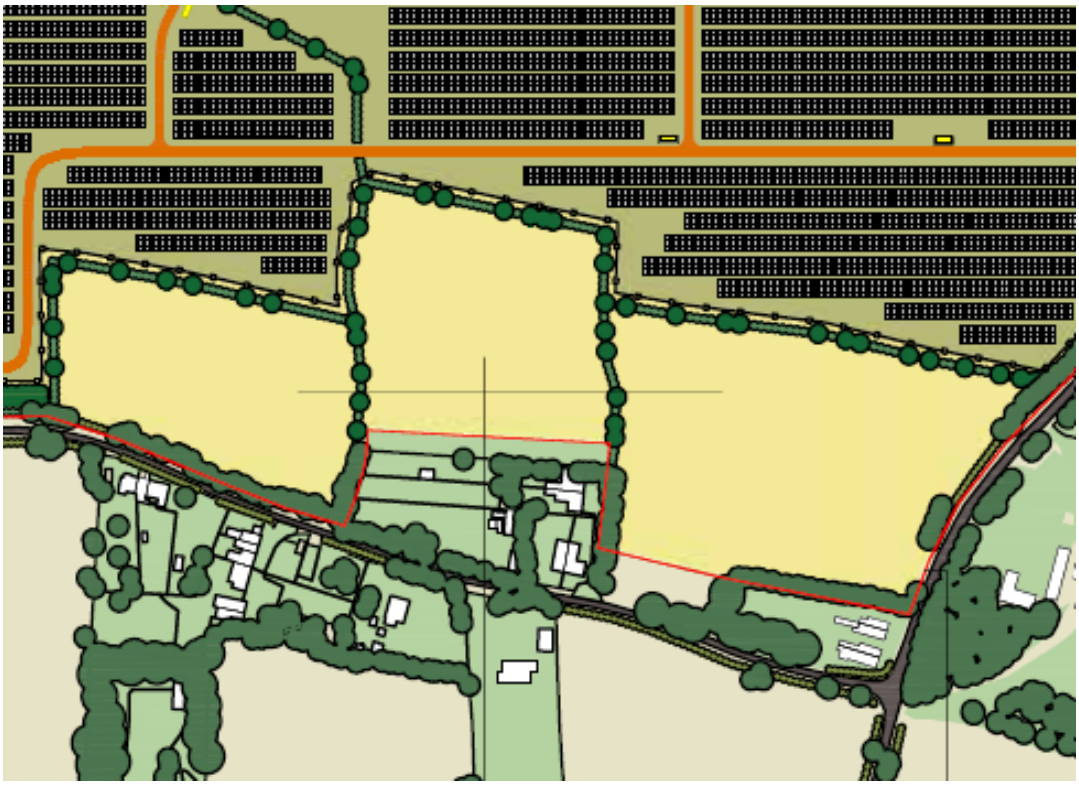


4.4.4 Hedgerows coloured in green on the proposed layout coincide with the original field pattern, whilst those shown in yellow are positioned in such a way as to replicate the

scale of the historic pattern whilst also facilitating an efficient operational solar array layout.

4.4.5 Whilst this long-term legacy is a long time away – c.40 years – it should be noted that the manner in which the scheme has been designed is such that the beneficial scale changes would be appreciated much sooner. It can be seen that the layout of the Proposed Development creates several smaller fields along the northern and southern boundaries of the Main Site. These fields would be managed as species diverse wildflower meadows throughout the life of the development, with the boundary hedgerows expected to provide effective screening within approximately 5 years.

Extract from LVIA Figure 9 [CD:A5] showing small scale meadows at southern edge of the Site



4.4.6 The grassland within the fenceline of the Proposed Development is expected to be grazed by sheep but alternatively could be managed by mowing. Whilst it is expected these areas would not achieve the same levels of species diversity as the field margins and dedicated wildflower meadows outside of the solar fencelines, the species mixes here will incorporate appropriate herbs and legumes which will provide pollinator and biodiversity benefits.

4.4.7 The proposed hedgerows would utilise native species such as hawthorn, blackthorn, holly, hazel, field maple, elder, dogwood, field roses. Hedgerow trees will comprise

species such as oak, hornbeam, elm, and small-leaved lime. The final detail of species composition and specification is anticipated to be subject to a planning condition and thus the approval of the Council

4.4.8 As confirmed in the SoCG, the quantum of landscape elements proposed within the scheme, are as follows:

i) approximately 10.3ha of species-rich grassland;
ii) approximately 33.7ha of grazed pasture;
iii) approximately 1.07ha of native woodland planting;
iv) approximately 2,500m of native hedgerow planting; and
v) 139 individual hedgerow trees.

4.4.9 The lightweight and modular nature of the Proposed Development is such that it can be readily disassembled and removed at the end of its operational lifetime with minimal need to disrupt or disturb the created landscape features, which will remain as permanent features.

The Site – Post Decommissioning (LVIA Figure 10) [CD: A5]

5.0 PROPOSED AMENDMENTS (POST-DETERMINATION)

5.1.1 The Appellant has proposed a number of amendments which are shown on drawings 3223-01-03a Rev A / 03b Rev A (General Arrangement) **[CD: C2 & C3]** and 3223-01-12 Rev A (Landscape Proposals) **[CD: C4].**

5.1.2 The amendments are as follows:

a) Amendment A: increased offset between Church Lane and the fenceline on both east and west sides, allowing additional woodland belt planting either side of Church Lane, increasing screening, integration and habitat connectivity.
b) Amendment B: additional woodland belt planting to the north side of Falstaff Manor to reduce potential intervisibility between the site and the Manor.
c) Amendment C: additional woodland belt planting along the eastern edge of the eastern parcel to provide greater screening between the solar farm and the railway line.
d) Amendment D: relocation of a proposed transformer within the central part of the western parcel further north (operational reasons).
e) Amendment E: gaps introduced to hedgerows to facilitate access between fields for agricultural purposes.

5.1.3 The amendments will have the effect of:

i) reducing the influence of the Proposed Development on users of Church Lane, particularly in winter
ii) limiting the scope for intervisibility between Falstaff Manor and the site – albeit that this seems to be very limited in any case due to intervening buildings
iii) Increasing screening to reduce views from trains

6.0 LANDSCAPE AND VISUAL IMPACT ASSESSMENT FINDINGS

6.1 Authorship and scope

6.1.1 The Landscape and Visual Impact Assessment **[CD: A4]** was authored by a Chartered Member of the Landscape Institute and directed and reviewed by a second Chartered Member. The LVIA has been undertaken in accordance with the Guidelines for Landscape and Visual Impact Assessment and comprises a main report supported by figures and appendices. It also identifies the national and local planning policies relevant to its content and conclusions.

6.2 Study area and baseline character framework

6.2.1 The LVIA defines its study area on the basis of computer-generated Zone of Theoretical Visibility modelling and adopts a study area extending to approximately 1 km from the site boundary. The baseline landscape character is described at national, regional, county, district and neighbourhood levels, with the district Landscape Character Areas identified by Babergh and Mid Suffolk District Council used as the framework against which effects on landscape character are assessed.

6.3 Landscape value within the LVIA

6.3.1 Landscape value is an underlying component of landscape and visual assessment because it informs the judgement of receptor sensitivity and therefore the assessment of effects. The LVIA addresses value through its baseline characterisation and its consideration of the policy and designation context. It records that the Site lies outside the National Landscape and is not subject to any landscape designation, and it evaluates the receiving landscape on the basis of its physical and perceptual characteristics as experienced at the site scale.

6.3.2 The Council (in the Consultation response prepared on its behalf by MBELC **[CD: B32]**) has criticised the LVIA for not identifying that the site lies within the APA. In my opinion, that point does not undermine the LVIA's findings. The APA is an extensive contextual study area rather than a statutory landscape designation – something that I address in more detail in the next part of my proof. Its extent necessarily includes landscapes of varied character, condition and quality. Whether or not the APA label is applied, the LVIA's value and sensitivity judgements are anchored in the baseline conditions on the ground and in the confirmed absence of designation. In those circumstances, the assessment remains properly calibrated,

and the conclusions reached on the likely extent and significance of landscape and visual effects remain robust.

6.4 Receptors and visual assessment approach

6.4.1 Visual effects are assessed from twelve viewpoints, selected to represent the range of visual receptors and directions of view around the site. Photomontages are prepared from four viewpoints and illustrate the appearance of the Proposed Development in the year it becomes operational and again ten years later, once proposed planting has become established. This provides an evidential basis for understanding both initial effects and the effect of mitigation over time.

6.4.2 Appendix JM3 to my proof contains the viewpoint visual materials, comprising the existing winter view, the photomontages (where prepared) and then existing summer views (the latter being supplementary to what was submitted).

6.5 Embedded mitigation included within the scheme

6.5.1 The LVIA **[CD: A4]** considers a scheme inclusive of embedded mitigation that is described within the proposed landscape scheme. Measures include the retention of existing boundary vegetation, the planting of approximately 2,600 m² of new woodland, an increase in the extent of hedgerows and hedgerow trees (including the reinstatement of historic field boundaries) resulting in a net increase of approximately 2.5 km, and diversification of grassland cover within the site. These measures accord with recommendations in published landscape character documents and result in. This is mitigation has been designed not merely as screening, but as a response to local character objectives.

6.6 Construction phase effects

6.6.1 With regard to construction effects, the LVIA concludes that effects would be locally significant for a short period, with little influence on land outside the site boundary. That is consistent with the temporary nature of construction activity.

6.7 Operational effects on landscape fabric

6.7.1 Once operational, the LVIA identifies a distinction between effects on the main site and those associated with the DNO substation. It concludes that effects on the landscape fabric of the main site are initially adverse but in the longer term tend towards beneficial outcomes, reflecting the establishment of new hedgerows and

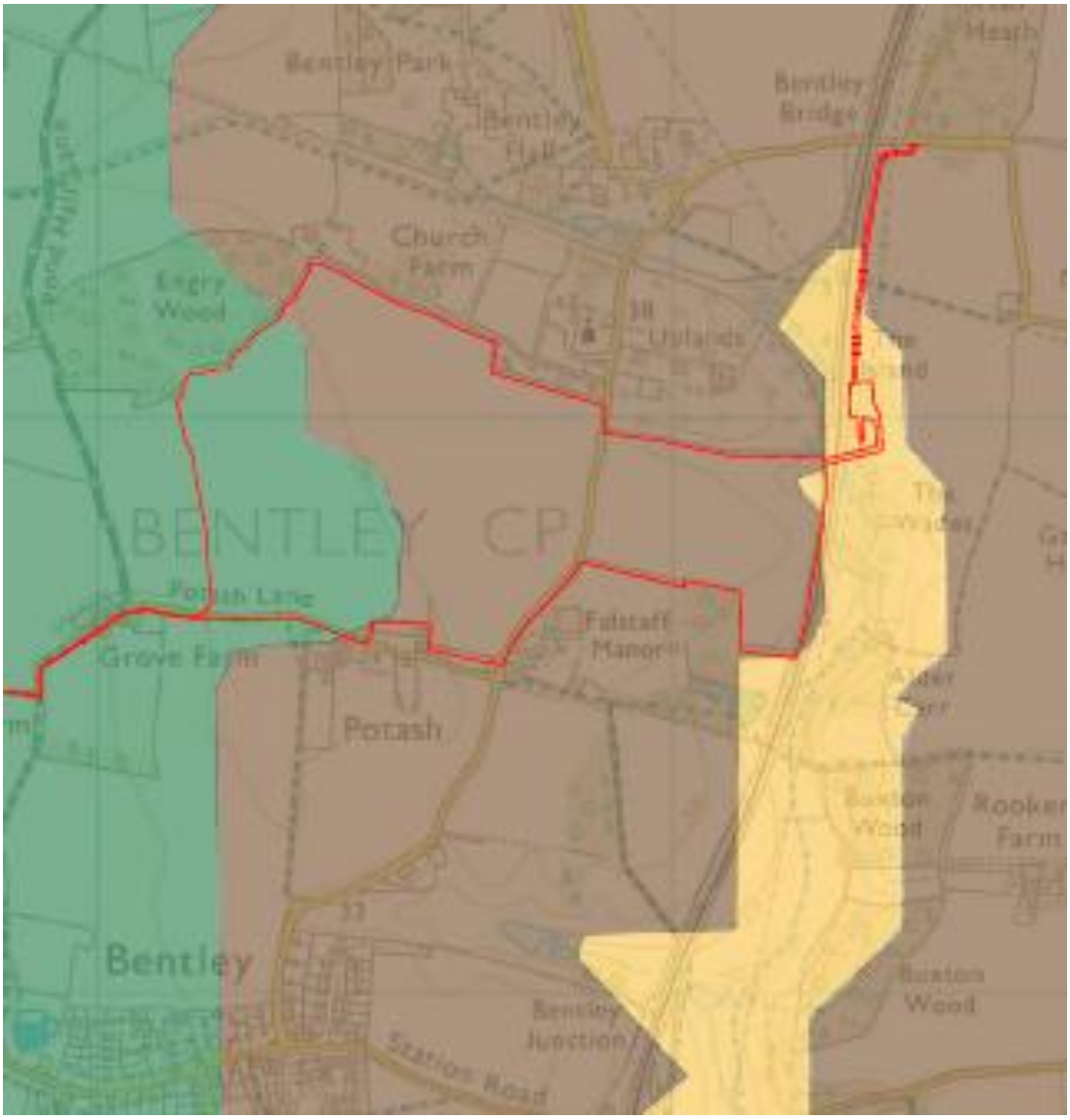
hedgerow trees and the strengthening of landscape structure. Effects associated with the substation are assessed as adverse, although also reducing in the longer term.

6.7.2 The operational phase summary indicates that, for the main site, farmland effects are reported as minor adverse in both the short and long term, while effects on hedgerows and hedgerow trees move from negligible to minor adverse in the short term to moderate to major beneficial in the long term. For the substation site, farmland effects are negligible, while the woodland mosaic receptor is reported as moderate to major adverse in the short term, reducing to moderate adverse in the long term.

6.8 Effects on landscape character

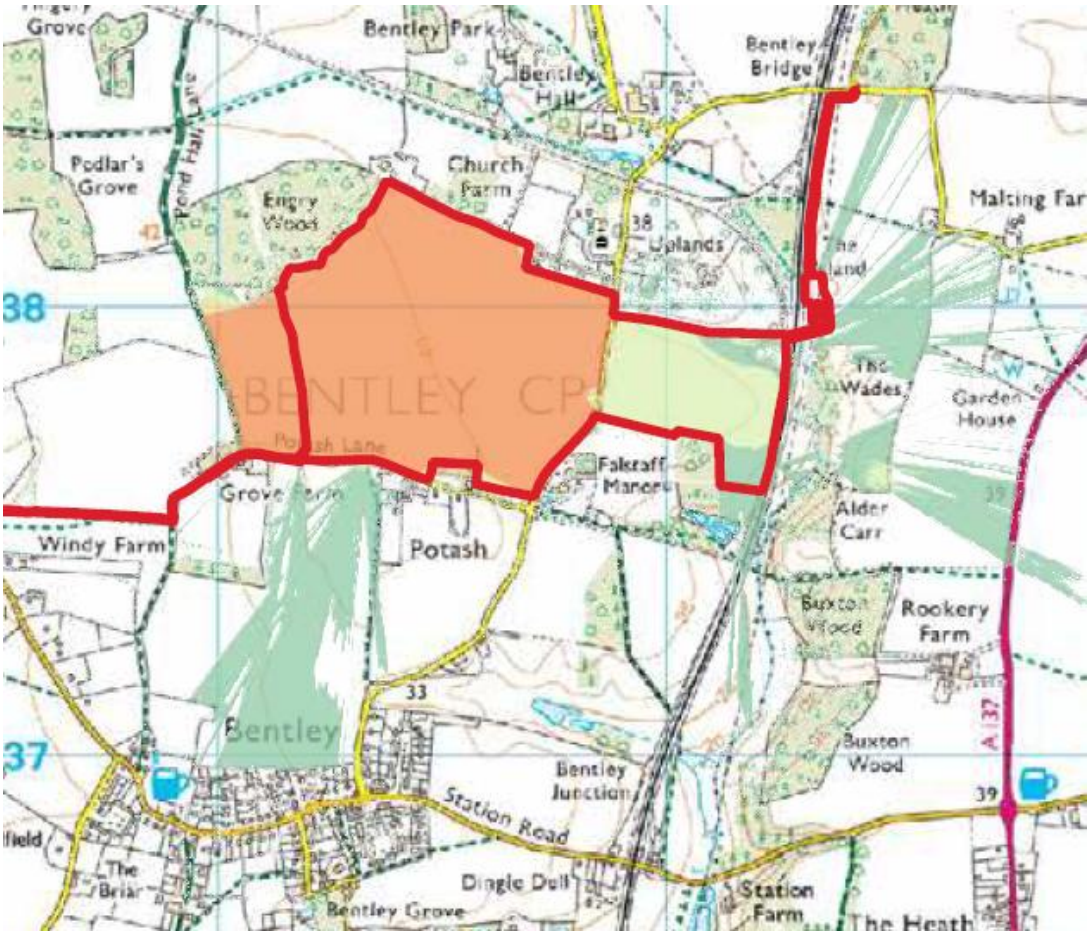
6.8.1 For landscape character, the LVIA concludes that within both the Ancient Estate Claylands LCA and the Ancient Estate Farmlands LCA (as originally described in the 2013 Shotley Peninsula LCA **[CD: G6]**) there would be a medium magnitude of change in landscape characteristics over a fairly small area. Change would reversible but nonetheless experienced for a long period of time. Change would be localised change, due to the low height of the Proposed Development, which would how widely it is perceived. Effects would reduce over time as mitigation planting matures.

Extract from LVIA Figure 7 [CD: A5] showing the Site relative to LCA extents



6.8.2 The largest reported effect is within the Ancient Estate Farmlands LCA (shaded brown in the above illustration), assessed as major to moderate adverse in the short term, reducing to moderate to minor adverse in the long term. It should be noted that these effects would be limited to a small proportion of the LCA within a short distance of the Site. This is illustrated by the ZTV on LVIA Figure 2 – extract reproduced below.

Extract from LVIA Figure 2 – ZTV [CD: A5] showing limited theoretical visibility from surrounding areas (and thus limited scope for character impacts)



Green shaded areas: 1-20% of the development theoretically visible:

6.8.3 Effects in the Ancient Estate Claylands LCA (shaded green) are reported as moderate adverse in the short term, reducing to minor adverse in the long term. Again, these apply only to a very small area of the LCA.

6.8.4 Effects on the two LCAs as reported in the LVIA are summarised in the below table. I concur with these findings

Landscape Character Area:	Value	Susceptibility	Sensitivity	Magnitude of change	Level of effect
Ancient Estate Claylands	Medium	Medium	Medium	Medium, becoming Small over time	Moderate adverse, becoming Minor adverse over time
Ancient Estate Farmlands	Medium to High	Medium to High	Medium to High	Medium, becoming Small over time	Moderate to Major adverse, becoming Minor to Moderate adverse

6.9 Effects on visual receptors

6.9.1 Visual effects follow a similar pattern, being adverse initially with a reduction over time as mitigation establishes. The LVIA identifies the largest viewpoint effect at Viewpoint 2 (*on Church Lane*), assessed as major to moderate adverse initially, reducing to minor adverse in the medium and long term. There are moderate adverse effects initially at Viewpoints 1 (*also on Church Lane*), 3 (*also on Church Lane*) and 5 (*from a bridleway, west of the main site*), reducing to minor adverse in the medium and long term, and moderate adverse effects initially at Viewpoint 12 (*from a public footpath west of Maltings House, looking towards the substation*), reducing to negligible in the medium and long term.

6.9.2 The operational phase summary also records viewpoint locations where effects are negligible, and locations where there is no change and therefore no effect.

6.10 Effects on residential receptors

6.10.1 The LVIA identifies that residents along the northern side of Potash Lane, and at Church Farm and Maltings House, would experience major to moderate adverse effects initially. In each case, effects are reported to reduce to minor adverse in the medium and long term, which is consistent with the mitigation strategy.

6.11 Summary of LVIA findings

6.11.1 In summary, the LVIA concludes that effects are most notable in the short term and within the immediate area, and that effects reduce over time as planting becomes established. The operational phase summary indicates that while some receptors

experience adverse effects initially, there are also longer-term beneficial effects recorded in relation to hedge and hedgerow tree structure on the main site.

6.12 Effects on users of public rights of way crossing or in the vicinity of the site

6.12.1 At the CMC, the Inspector specifically requested **[CD: C21]** that the likely effects on users of public rights of way crossing or in the vicinity of the Site be addressed.

6.12.2 The LVIA identifies that views from nearby routes are typically intermittent and sequential, obtained through gaps in hedgerows, rather than being sustained or panoramic.

6.12.3 For users of the bridleway to the west and Church Lane and Potash Lane, the LVIA's representative PRoW viewpoints indicate that, where the proposals are visible, effects would generally reduce over time as mitigation establishes (for example, from moderate adverse in the short term to minor or minor–negligible in the long term for bridleway users at FP65)

6.12.4 Other PRoW locations effects are assessed as minor reducing to negligible, or negligible throughout. The LVIA also records that existing vegetation will screen views in summer and filter them in winter, such that the clearest views would occur at field openings/access gaps and could be described as "glimpsed".

6.12.5 As such the effects on users of public rights of way are consistent with the rest of the findings of the LVIA. Effects would be limited, localised and would reduce over time.

7.0 THE ADDITIONAL PROJECT AREA (APA)

7.1 Origins

7.1.1 The area surrounding the Site is an area of landscape that has been subject to multiple layers of landscape assessment and appraisal. Some of these studies are available to review and others are seemingly lost to history. The latter category includes documentation of the rationale and origins of the Dodnash SLA and the National Landscape APA. This is documented in the Valued Landscape Assessment of the APA **[CD: G9]**, where it is postulated that the origin of the APA was an aspiration to extend the AONB.

7.1.2 This aspiration was achieved in 2020 following the undertaking of the Natural Beauty Assessment **[CD: G8]**. Whatever the rationale was for the APA extents, having used this (in combination with the former SLA boundary) to define the study area for the Natural Beauty Assessment, the study subsequently evaluated the whole area using a methodology underpinned by Landscape Character Assessment best practice. The principal source document for this study was the Alison Farmer Associates Shotley Peninsula and Hinterland Landscape Character Assessment undertaken in 2013 **[CD: G6]**.

7.2 Evaluation

7.2.1 Evaluation of the study area in the Natural Beauty Assessment **[CD: G8]** revealed that whilst some areas included a good range of features that contribute to higher levels of natural beauty, other areas, '*particularly parts of the plateau farmland, appeared to lack these types of features and to be flat areas of intensive agriculture typical of much of inland Suffolk and Essex*'. Whilst the study was supported by illustrations and maps of the evaluation areas shown on a series of Figures, the Figures are not appended to the version of the report on the Natural England website, and I have been unable to view them elsewhere. A reasonable understanding of the evaluation process and the geographic areas to which it refers is nonetheless possible to elicit from the tabulated exercise in section 6.

7.2.2 Pages 70 to 74 of this exercise within **CD:G8** set out the evaluation of the Shotley Peninsula Plateau (sub area D3) – this being the part of the assessment relevant to the Site.

7.2.3 The evaluation describes a landscape that is overall defined as being of moderate landscape and scenic quality, with some isolated pockets of higher quality including one that is associated with the cluster of heritage buildings north of Bentley. The report notes these isolated pockets areas are limited in extent within a wider area which overall, lacks distinction due to the intensity of modern agricultural use.

7.2.4 On the basis of this evaluation, the Shotley Peninsula Plateau as a whole was not considered suitable for inclusion within a Candidate area for designation. (Candidate areas being thereafter subject to further examination in order to potentially become extensions to the AONB)

7.2.5 Having undertaken such a comprehensive study of the Shotley Peninsula and gained a detailed understanding of its landscape characteristics, it seems to be folly at best that the current National Landscape management plan (2023-2028) **[CD: E3]** persists on page 19 (as per the below quote) in describing the APA wholesale as a Valued Landscape, when it is very evident that it has been demonstrated in the National Landscape Partnerships own studies that the majority of it is nothing more than typical Suffolk farmland.

These areas are valued landscapes as defined by the National Planning Policy Framework and are an important part of the setting of the AONB.

7.2.6 Whilst failing to make the grade as AONB might not necessarily mean that areas would not qualify as Valued Landscapes, what is clear from the analysis in the Natural Beaty Assessment is that areas that failed to meet the requirements of being Candidate areas did so because they were in very large part ordinary areas of countryside that were subject to degradation or contained detractors. Logic suggests that these characteristics are likely to mean that they also do not meet the criteria for Valued Landscape status.

7.2.7 Despite the overarching statement in the introduction to the Valued Landscape Assessment **[CD: G9]** I have seen no further evidence to indicate which parts of the APA have been managed by the AONB Countryside Management Service operating within the area beyond the boundary of the existing AONB. My expectation is that any such activity would have been restricted to transitional areas between the inland plateau of the APA and the coastal areas of the AONB, rather than land with entirely different characteristics remote from the coast.

7.2.8 In its consultation response **[CD:B32]**, MBELC makes reference to the Management Plan **[CD: E3]** on p19 where it describes the APAs as areas adjacent to the AONB that are considered important for the context of the nationally designated landscape, an important part of the setting of the AONB, with the Shotley Peninsula (among other areas) having been subject to landscape character assessment identifying links to the AONB and the importance of a co-ordinated land management approach.

7.2.9 Again, this statement is all very well, but it is clear from the studies of the APA that there are some areas that were considered to be similar to the AONB or which directly adjoined it, which as a consequence were designated in 2020 as an extension. The majority of the APA did not fall into this category. The detailed evaluation of area D3 of the APA in **CD: G8**, which the Site falls within, can be seen to make no reference to the landscapes of the AONB.

7.2.10 Some areas, including wooded areas at Holbrook Park and Dodnash, are noted to by contiguous with neighbouring areas of the higher quality Samford and Freston valleys (both of which now form part of the AONB), but even they are not cited as providing important setting.

7.3 Overall

7.3.1 Overall, it strikes me that the APA is a construct that has served its purpose and is no longer relevant.

8.0 VALUED LANDSCAPES

8.1 Introduction

8.1.1 The National Planning Policy Framework requires planning decisions to protect and enhance valued landscapes in a manner commensurate with their identified quality. The term “valued landscape” is not defined in policy, so its meaning has been shaped by case law and professional guidance.

8.1.2 The leading authority is the judgment of Ouseley J in Stroud District Council v Secretary of State for Communities and Local Government. The central point is that “valued landscape” cannot sensibly mean all countryside, otherwise the word “valued” would add nothing to policy. The test is therefore a threshold one: for an undesignated landscape to be “valued” in NPPF terms it must be shown, on the basis of identifiable attributes, to be demonstrably beyond the ordinary. Whether that threshold is met is a matter of planning judgment, but it must be supported by a coherent explanation and a fair reading of the evidence.

8.1.3 In practice, the question is not whether the landscape contains any valued characteristics (most rural areas do), but whether the landscape as a whole, or the relevant landscape unit being relied upon, is sufficiently elevated—by reason of its qualities, condition, and perceptual/cultural attributes—to pass a “more than ordinary” bar.

8.2 Method and scope of my review

8.2.1 In order to address the “valued landscape” dispute transparently, I have undertaken two complementary exercises. Both are intended to test whether the evidence relied upon by others demonstrates a landscape that is, in the round, demonstrably above ordinary countryside, rather than simply containing valued features within an otherwise mixed or ordinary baseline.

8.2.2 Assessment of landscape value is a fundamental component of landscape and visual assessment. An assessment of value, in combination with an assessment of susceptibility, informs the judgement of receptor sensitivity and, in turn, the likely significance of effects.

8.2.3 There is no prescribed single method for identifying whether an undesignated area is a “valued landscape”, but there are two established and commonly used structural frameworks that provide a transparent way to examine the evidence and reach a

reasoned conclusion. These are the value-related factors set out in GLVIA3 Box 5.1 (published in 2013) **[CD: G1]**, and second, the Landscape Institute's TGN 02/21 guidance (published in 2021) **[CD:G3]**.

8.2.4 GLVIA3 Box 5.1 provides a structured way of identifying and describing the factors that can contribute to landscape value and has been used in two of the landscape assessment documents that provide the evidence base to this Appeal, these being the Bentley Neighbourhood Plan Landscape Appraisal (2019) **[CD: G7]** and the APA Valued Landscape Assessment (2020) **[CD:G9]**. In Appendix JM1 I have tabulated the results of the Box 5.1 exercises from each, with the findings against each factor listed side by side for the two assessments alongside my own evaluation.

8.2.5 Landscape Institute Technical Guidance Note 02/21 (TGN 02/21) **[CD: G3]** builds on the same general concept established by Box 5.1 but is aimed specifically at supporting practitioners and decision-makers when assessing landscape value outside nationally designated landscapes. It sets out a set of value factors and prompts for the evidence base that should be considered, with the intention of making value judgements more transparent, consistent and defensible. Appendix JM2 sets out the TGN 02/21 exercise undertaken by MBELC in its note of August 2024 **[CD: B32]** alongside my evaluation.

8.3 My Box 5.1 conclusions at the site scale (summarising Appendix JM1 findings)

8.3.1 My Box 5.1 appraisal focuses deliberately on the Site and its immediate surroundings, i.e. the landscape unit that would actually receive and experience the proposal.

8.3.2 Whilst I acknowledge the presence of positive features in the wider area, most notably ancient woodland, mature trees and the historic Bentley Hall/Church grouping to the north, the landscape centred on the site is best described as an area of working, modernised arable plateau of mixed condition.

8.3.3 It is characterised by large, simplified field units, with obvious historic hedgerow removal and continuing hedgerow weakness/decline. There is limited topographic variation, and influence of modern artefacts and infrastructure (including pylons and the railway) on perceptual qualities.

8.3.4 Scenic quality is "pleasant but ordinary" in the site-context, with higher-quality experiences consisting of adjacent localised pockets rather than a uniform

characteristic of the receiving landscape. Rarity and distinctiveness are also limited, with many of the features relied upon by others (ancient enclosure framework, quiet lanes, dispersed heritage assets) widespread across Suffolk/lowland England. Genuinely rarer landscapes are those that survive intact and which are not degraded, which is not the case in the immediate site context.

8.3.5 Overall, my Box 5.1 exercise points to a landscape of predominantly medium value, with some attributes tending higher only where the analysis shifts away from the site-centred unit to stronger pockets elsewhere. This is consistent with the LVIA findings.

8.4 Comparison with AFA and the APA assessment

8.4.1 It is important to note that the two Alison Farmer Associates exercises do not assess the same extent as my appraisal. The Bentley Neighbourhood Plan exercise considered the whole parish, and the part of the APA study referenced considered the Western Wooded Plateau (the relevant sub area of the APA). In contrast, my exercise tests the site and immediate receiving landscape.

8.4.2 It is also important to recognise that the two studies I am comparing against do not purport to be "valued landscape" determinations in NPPF terms. They were prepared for different purposes and at different times, and both pre-date the current emphasis in national policy and case law on whether an undesignated landscape should be treated as "valued" for the purposes of the Framework. (This is somewhat counter intuitive given that one of the studies is titled a Valued Landscape Assessment)

8.4.3 Consistent with the above, neither exercise provides an explicit value judgement against each Box 5.1 criterion, and neither draws any single, definitive conclusion as to whether the study area or parts of the study area should as a whole be considered "valued".

8.4.4 All three analyses (including my own Box 5.1 appraisal) present a mixed picture, identifying positive characteristics, such as woodland structure, historic route patterns and pockets of intact historic character, alongside negative influences and detractors, including boundary loss, fragmentation and modern infrastructure.

8.4.5 The key point is therefore one of appropriate use and interpretation. These exercises can assist in describing landscape character and identifying valued attributes across wider areas, but they cannot be treated as evidence that a "valued landscape" exists

in the specific NPPF/case law sense, because they simply do not set out to answer that question.

8.5 My assessment against the TGN 02/21 / Box 5.1 value factors

8.5.1 My assessment applies the recognised value factors (natural heritage, cultural heritage, condition, associations, distinctiveness, recreation, perceptual qualities and function) to the landscape unit relevant to the Site. It acknowledges that there are positive features within the wider area, particularly ancient woodland, mature trees, the historic Bentley Hall/Church complex, and a network of rural lanes and routes - but it also gives proper weight to the more ordinary components of the receiving landscape and to evident detractors.

8.5.2 In particular, the landscape around the site has been materially altered by twentieth-century agricultural change, including hedgerow loss and amalgamation into larger arable field units, such that landscape condition and scenic/perceptual qualities are mixed rather than uniformly strong. Tranquillity is similarly variable and reduced by modern influences and infrastructure, and the recreational offer (while present) is not unusual in the context of lowland England.

8.5.3 Overall, when these factors are considered “in the round”, my assessment identifies a landscape of predominantly medium value, with some factors tending higher only where the analysis focuses on discrete pockets of intactness rather than the site-centred landscape as experienced.

8.6 Comparison with MBELC’s assessment

8.6.1 MBELC’s assessment reaches consistently higher value judgements across the same factors, typically by emphasising the strongest positive elements (ancient woodland, mature/veteran trees, the Hall/Church complex, historic lanes and PRoW connections, and perceived tranquillity) and treating these as characteristic of the landscape more generally. While those elements are real and contribute to local character, MBELC’s approach is, in my view, selective in its sampling of the evidence base and tends to underplay the ordinary baseline and the detracting elements that are intrinsic to the landscape unit relevant to the Site, most notably the extensive loss and weakening of hedgerow structure, the resultant enlarged and simplified arable field pattern, and the influence of modern infrastructure and contemporary agricultural practice on scenic and tranquillity qualities.

8.7 Summary

8.7.1 In summary, the available evidence does not demonstrate that the landscape unit relevant to the Site is “valued” in the NPPF sense as interpreted by Ouseley J, i.e. demonstrably beyond the ordinary.

8.7.2 My Box 5.1 appraisal shows a mixed receiving landscape in which positive elements are present but sit alongside clear signs of alteration and ordinary, modern arable character. The earlier AFA Box 5.1 studies, prepared for different purposes and before the current NPPF emphasis, do not purport to make, and do not make, any determinative finding of “valued landscape” status.

8.7.3 The more recent value-based analyses relied upon by the Council and others, in my view, reach elevated conclusions by selective emphasis on the strongest pockets of character and by underplaying the role of detractors and the presence of the very ordinary baseline that is intrinsic to much of the site’s setting.

8.7.4 Taking the evidence fairly and in the round, I conclude that the Site does not lie within a valued landscape for the purposes of the Framework; and in any event, as I address in the following section, the proposal would not materially erode the characteristics said to underpin local landscape quality and would deliver substantial, secured enhancement through hedgerow reinstatement and strengthened landscape structure.

9.0 WHAT IF THE LANDSCAPE IS "VALUED"?

9.1 Introduction and approach

9.1.1 Notwithstanding my conclusion that the Site does not lie within a valued landscape in NPPF terms, this section of my proof considers the position were the Inspector to proceed on the basis that the relevant landscape is "valued".

9.1.2 The purpose is to then test (i) what the valued attributes are said to be, (ii) whether the proposals would materially harm those attributes, and (iii) the weight that should be applied in the planning balance given the scale, duration, reversibility and mitigation of the scheme.

9.2 What "valued" would mean in this case

9.2.1 "Valued" status is not a designation in itself and does not mean the landscape is incapable of change. The key question is whether the development would lead to unacceptable adverse effects on the characteristics that are said to give rise to value, and whether those effects are limited, localised and appropriately mitigated, having regard to the nature of the proposal and relevant policy support for renewable energy.

9.2.2 In applying that approach, it is important to distinguish between: (a) the assets and components which are said to underpin value (for example ancient woodland, historic lanes, heritage groupings and dispersed settlement pattern), and (b) the particular parcel of land that would accommodate the solar array. In my judgment, much of what is relied upon to demonstrate elevated value comprises features that are either physically separate from the Site or are not dependent on the Site remaining free from all change.

9.3 Claimed valued attributes and their relationship to the appeal proposals

9.3.1 The Council and Rule 6 Party place weight on a number of recurring themes: the presence of ancient woodland and mature trees; the historic and cultural interest associated with the Bentley Hall / Church grouping and nearby vernacular farmsteads; the network of rural lanes and public rights of way that are said to express historic route patterns; and perceptual qualities including tranquillity, rural seclusion and scenic appeal.

9.3.2 I do not dispute that these are positive characteristics within parts of the wider area. However, the relevant question in this section is whether the proposals would materially harm those characteristics such that they would amount to unacceptable effects on the landscape as claimed to be “valued”.

9.4 Whether the proposals would materially harm the claimed valued attributes

9.4.1 In physical terms, the proposals do not remove the components typically relied upon to evidence value. Ancient woodland blocks, mature trees and woodland belts would be retained and buffered. The rural lane network, the dispersed settlement pattern and the core heritage assets, including the Bentley Hall / Church grouping, would remain intact and unaltered. There is therefore no loss of the fundamental fabric that is said to give rise to value.

9.4.2 Any effects arise primarily in perceptual and visual terms, and they are localised. In the early operational period, there would be intermittent views of the solar infrastructure from parts of the immediate surroundings where boundary vegetation is currently weakened or absent. Those views are, however, experienced within a landscape that already includes elements of modern influence and change, and they are capable of effective mitigation.

9.4.3 The siting of the scheme is material. The development is located within exceptionally large field units created through twentieth-century agricultural rationalisation and the removal of hedgerows. In other words, the receiving landscape around the Site is not an intact historic field pattern; it is an area where structure and enclosure have already been reduced, and where the legibility of historic grain is currently weakened.

9.4.4 Against that baseline, the mitigation is not simply a matter of attempting to “hide” development. The scheme includes substantial hedgerow reinstatement and strengthening of boundary structure, with a high proportion aligned to historic boundaries, together with associated planting. These measures directly address an acknowledged weakness in the site-centred landscape by restoring scale, grain, enclosure and legibility and by reducing open views across uncharacteristically enlarged arable fields. As planting establishes, the extent of visibility reduces and the experience from lanes and nearby public rights of way returns increasingly to a filtered, rural, wooded-farmland character.

9.4.5 Tranquillity and recreational experience would also be maintained. The proposal introduces no new lighting and will have low levels of operational activity; any

disturbance is largely confined to the construction phase. Public access is unaffected. Where views are available at present, they are intermittent and will become more limited over time as reinstated hedgerows mature, thereby strengthening enclosure along routes.

9.4.6 The temporary and reversible nature of the proposal is also relevant to the weight to be applied. The solar farm would be consented for a defined operational period and can be fully decommissioned, with the land capable of being fully restored.

9.4.7 By contrast, the reinstated hedgerow network and associated planting, secured and managed appropriately, has the potential to endure and mature, leaving a positive legacy in landscape structure beyond the operational life of the development.

9.5 Industrial and incongruous?

9.5.1 The landscape reason for refusal describes the proposals as introducing an "incongruous, industrialised character" and as an "abrupt, alien and jarring form of development". Those are pejorative labels rather than accurate descriptions of actual effects. A solar farm is, of course, utilitarian in form, but the question for the Inspector is whether the development would give rise to unacceptable adverse effects on landscape character and visual amenity when assessed in the round, having regard to the scale and height of its components, the duration proposed, and the reversibility and embedded mitigation inherent in the proposal. The "industrial" label is not a helpful characterisation in this context: the proposals will not introduce industrial buildings or industrial activity, and the physical form is low-height, modular, and capable of removal at the end of the operational period.

9.5.2 In practice, ground-mounted photovoltaic development is typically experienced as infrastructure sitting lightly on the landscape, rather than as development embedded in the landscape in the manner of permanent built form. There is airspace between and under the solar arrays, and natural soils and vegetation persist and continue to function beneath them. The change is therefore most commonly perceived as development which is occupying parts of existing fields (and functional fields at that, where there is continued agricultural management such as grazing), rather than as a wholesale change to the landscape type or a permanent land use change to the Site as a whole.

9.5.3 Where views are available, they are filtered and localised and include the functional fields; and, as addressed above, the reinstated hedgerow network and associated planting can strengthen enclosure and restore landscape structure over time.

9.5.4 This is also consistent with the direction of national policy support for renewable and low carbon energy in the December 2025 consultation draft NPPF, which gives substantial weight to the benefits of renewable and low carbon energy development. Policy S5 also recognises that energy infrastructure is a form of development that should be approved outside settlements (I.e. in the countryside), subject to the balance of benefits and adverse effects when assessed against national decision-making policies taken as a whole

9.5.5 Against that policy backdrop, it is more appropriate to test the scheme against its evidenced, site-specific landscape and visual effects (including mitigation, duration and reversibility) than to rely on loaded descriptors such as “industrial”, “alien” or “jarring” as a proxy for that assessment. Large solar farms are after all only found in the countryside – they are an established rural land-use.

9.6 Conclusion on acceptability of harm “even if valued”

9.6.1 Accordingly, even if the Inspector were to proceed on the basis that this is a valued landscape, the proposals would not materially erode the characteristics said to underpin that value. The core components would remain intact; any adverse effects would be limited, localised, time-limited and reversible; and the mitigation would deliver a sustained improvement in landscape structure and condition.

10.0 SUMMARY AND CONCLUSIONS

10.1 The key issues in this case

10.1.1 In my professional opinion, the landscape case turns on the proper interpretation and testing of the landscape reason for refusal as a whole, including the assertions about the nature of the change, the character of the receiving landscape, and the significance of any resulting effects. In particular, it raises a small number of linked questions:

i) whether the Site's relationship to the Additional Project Area (APA) properly elevates the weight to be given to landscape value, or provides reliable evidence that the receiving landscape should be treated as a valued landscape for NPPF purposes;
ii) whether the LVIA has properly addressed and evidenced landscape value (including any implications said to arise from the APA);
iii) whether the LVIA has correctly identified and described the likely landscape and visual effects of the Proposed Development, including the extent and nature of change and the role of embedded mitigation; and
iv) valued landscape or not, whether any identified harm would be material, and if so whether it would be unacceptable when assessed in the round against the relevant policy tests and the benefits of the scheme.

10.2 Valued landscape status

10.2.1 It is my view that the landscape surrounding the Site cannot properly be categorised as a valued landscape for NPPF purposes.

10.2.2 The Council and the Rule 6 Party identify positive characteristics within the wider area including ancient woodland, hedgerows with mature hedgerow trees, cultural heritage interest and associations, woodland distribution, a dispersed settlement pattern, vernacular farm complexes, sinuous rural lanes, a well-developed PRoW network, and relatively limited modern development.

10.2.3 However, what is not explained is why this assemblage of components, many of which are neither unique nor unusual across large parts of rural England, should, in the round and at the relevant scale, elevate the landscape beyond the ordinary countryside baseline required by the Ouseley threshold.

10.2.4 My professional opinion is that the evidence relied upon does not set the receiving landscape around the Site apart from ordinary countryside in a way that would justify valued landscape status in Framework terms.

10.3 LVIA calibration and reliability

10.3.1 I am entirely satisfied that, regardless of whether the receiving landscape is ultimately categorised as valued or not, the LVIA **[CD: A4]** has appropriately described the receiving landscape and assessed effects correctly, including in its treatment of landscape value. It identifies the site-centred landscape as one that contains positive elements but is also influenced by twentieth-century agricultural change and modern infrastructure, and it reasonably predicts effects that are limited in extent and reduce materially as mitigation establishes. In my judgment, awareness of additional contextual material does not alter the underlying physical and perceptual baseline on the ground, nor would it lead to materially different conclusions on the likely significance of effects.

10.4 Overall conclusions on landscape effects and scheme design

10.4.1 In my opinion the appeal proposals, whether as originally submitted or as amended through the appeal, are well considered and have been brought forward with carefully designed embedded mitigation. Importantly, that mitigation responds directly to one of the principal sources of landscape degradation in the immediate area, namely the loss and weakening of hedgerow structure and the resultant creation of enlarged field units through twentieth-century agricultural improvement. The scheme proposes the reinstatement of a more appropriate field scale comparable to that which existed prior to the widespread hedgerow removal of the mid twentieth century.

10.4.2 The proposals include approximately 2.5 km of new hedgerows, around half of which would align directly with historic boundaries, with the balance designed to achieve the same objective of reinstating appropriately scaled fields and providing effective screening of the operational development. As a result, landscape and visual effects would be limited and localised and would reduce over time as planting matures. Change to the wider framework of elements that enclose and adjoin the Site, including boundary hedges, woodland blocks, historic lanes, and the principal cultural heritage assets relied upon by others, would be minimal, with those components remaining intact.

10.4.3 The description of the proposals as “industrial”, “incongruous”, “alien” and “jarring” in the reason for refusal is, in my opinion, misplaced. This form of development is low-height, modular and reversible and sits lightly in the landscape; it is not industrial activity or industrial built form. Large ground-mounted solar farms are, by their nature, predominantly a countryside form of development. In this case, the proposals can be effectively screened and would be capable of co-existing with neighbouring receptors with only limited adverse effects.

10.5 Even if valued

10.5.1 Consequently, even if the Inspector were to accept the Council’s position that the landscape should be treated as valued, the evidence indicates that direct effects on the components said to contribute to value would be limited, localised and time-limited, and would reduce over time.

10.5.2 Moreover, the mitigation proposed would reinstate features that were present until the mid-twentieth century but subsequently lost, and whose loss has been detrimental to landscape structure, legibility and condition. Their reinstatement would therefore be restorative and beneficial, strengthening enclosure and improving the coherence of the immediate landscape.

10.6 Conclusion

10.6.1 There are therefore strong landscape grounds to uphold this appeal. The development is time-limited and reversible, and the embedded mitigation will strengthen landscape structure such that, following decommissioning, the landscape would be left in a more robust and more valuable structural condition than would prevail without the scheme.