

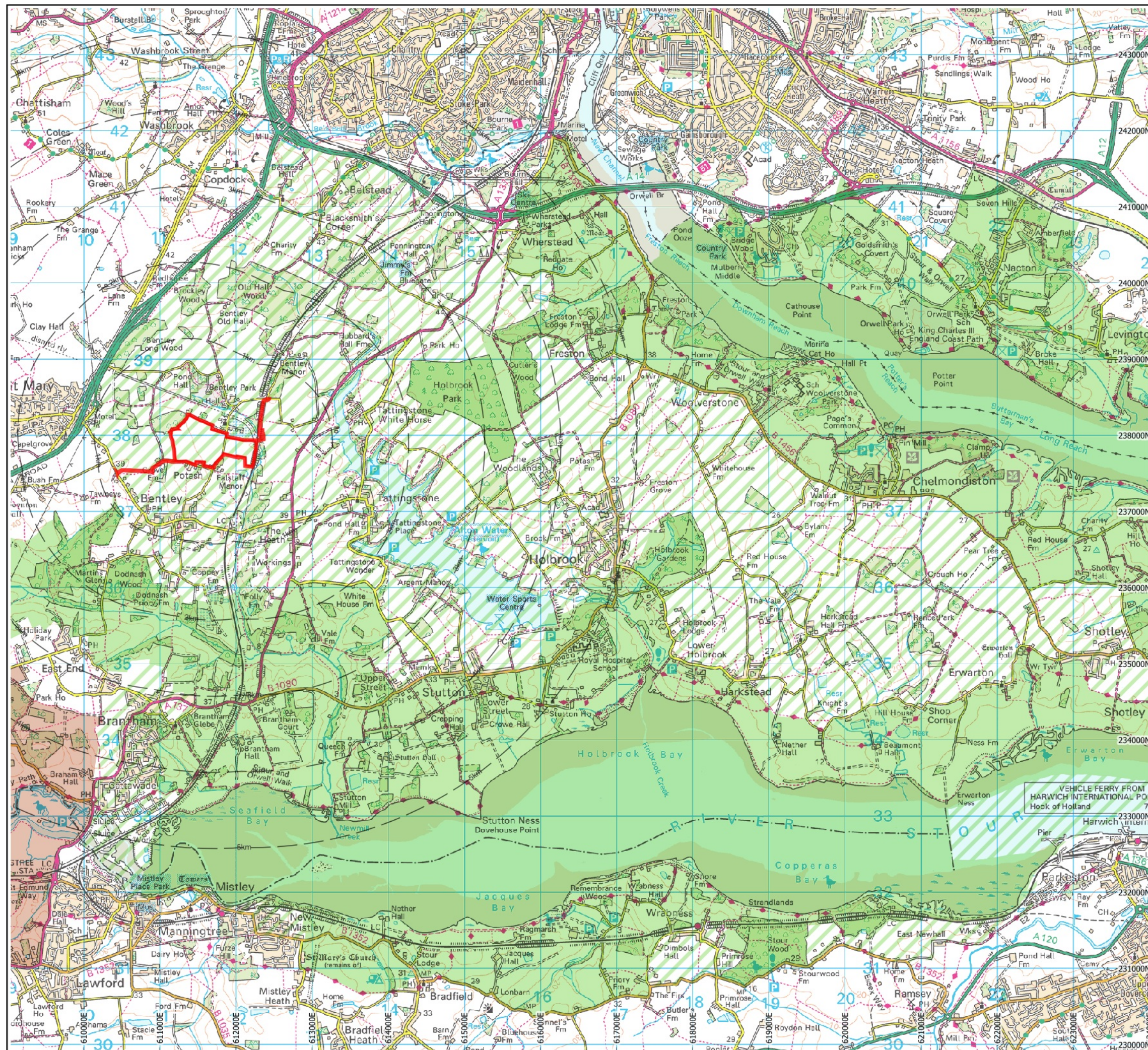


APPENDICES

MB Appendix 1	Figures (A3)
MB Appendix 2	Methodology
MB Appendix 3	Review of Alternative Sites Assessment

MB APPENDIX 1

Figures



MB FIGURE 1. SITE CONTEXT



PROJECT
Groves Farm Bentley solar farm

CLIENT
Babergh District Council

DATE
25/11/2025

Legend

 Site boundary

 1km offset lines

National Landscapes

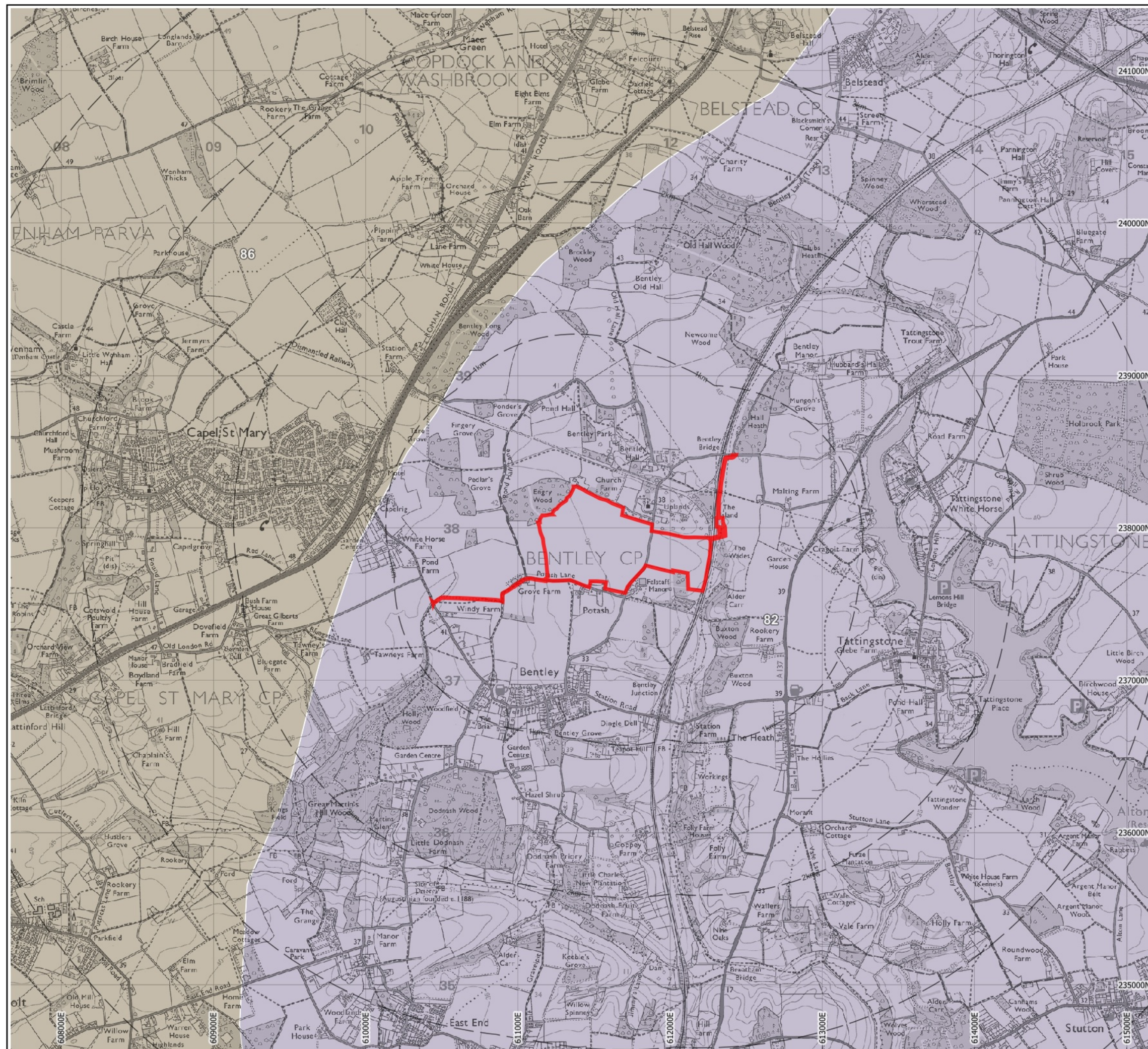
 Dedham Vale

 Suffolk Coast & Heaths

 Suffolk Coast & Heaths
Additional Project Area

 1:50000

1 0 1 2 3 km



MB FIGURE 2. NATIONAL CHARACTER



PROJECT
Grove Farm Bentley solar farm

CLIENT
Babergh District Council


DATE
25/11/2025

Legend

 Site boundary

 1km offset lines


National Character Areas

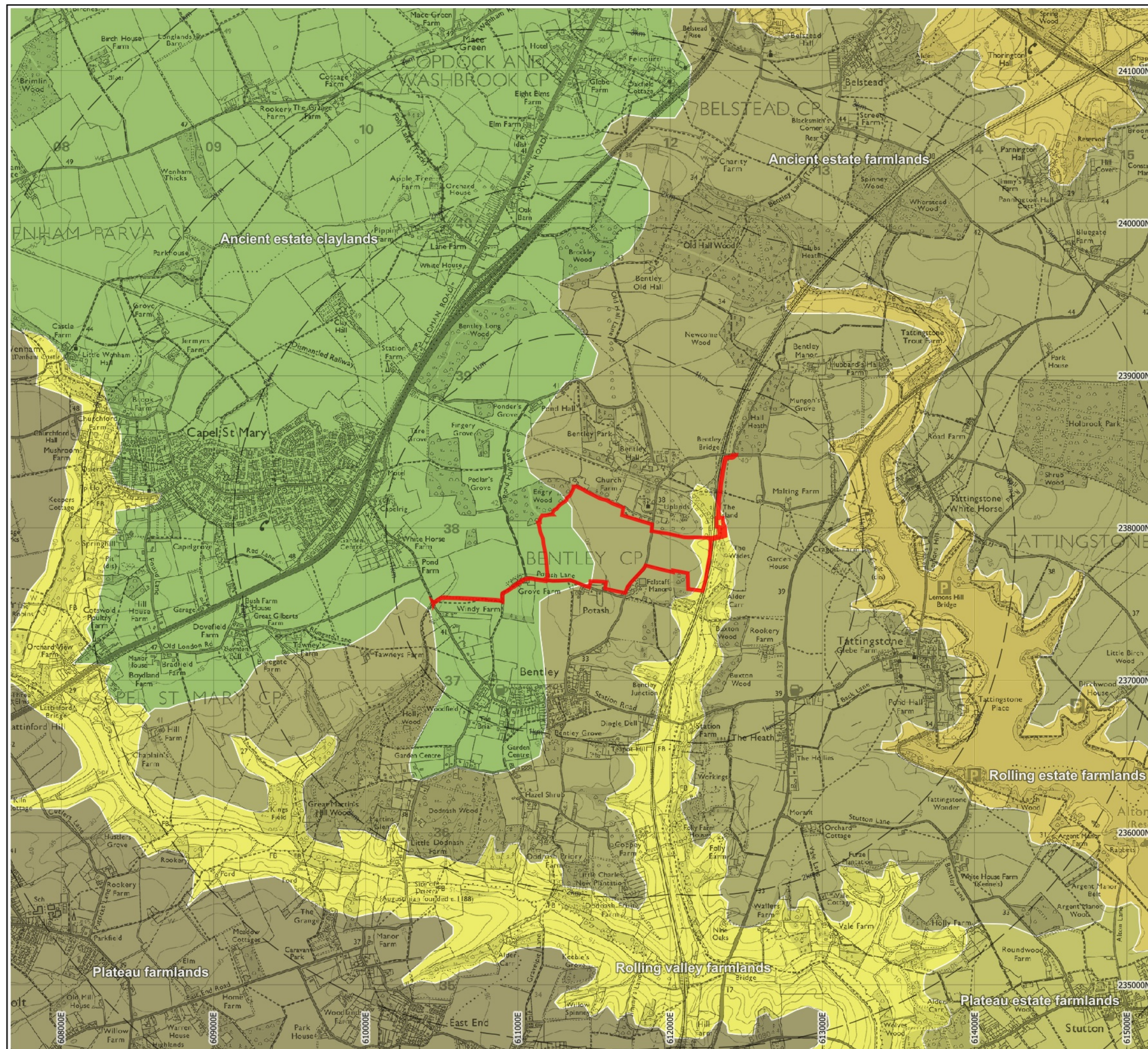
 86 South Suffolk and North Essex Clayland

 82 Suffolk Coast and Heaths

Data from Natural England National Character Areas

 1:25000

 1 0 1 km



MB FIGURE 3. COUNTY/DISTRICT CHARACTER



PROJECT
Grove Farm Bentley solar farm

CLIENT
Babergh District Council

DATE
25/11/2025

Legend

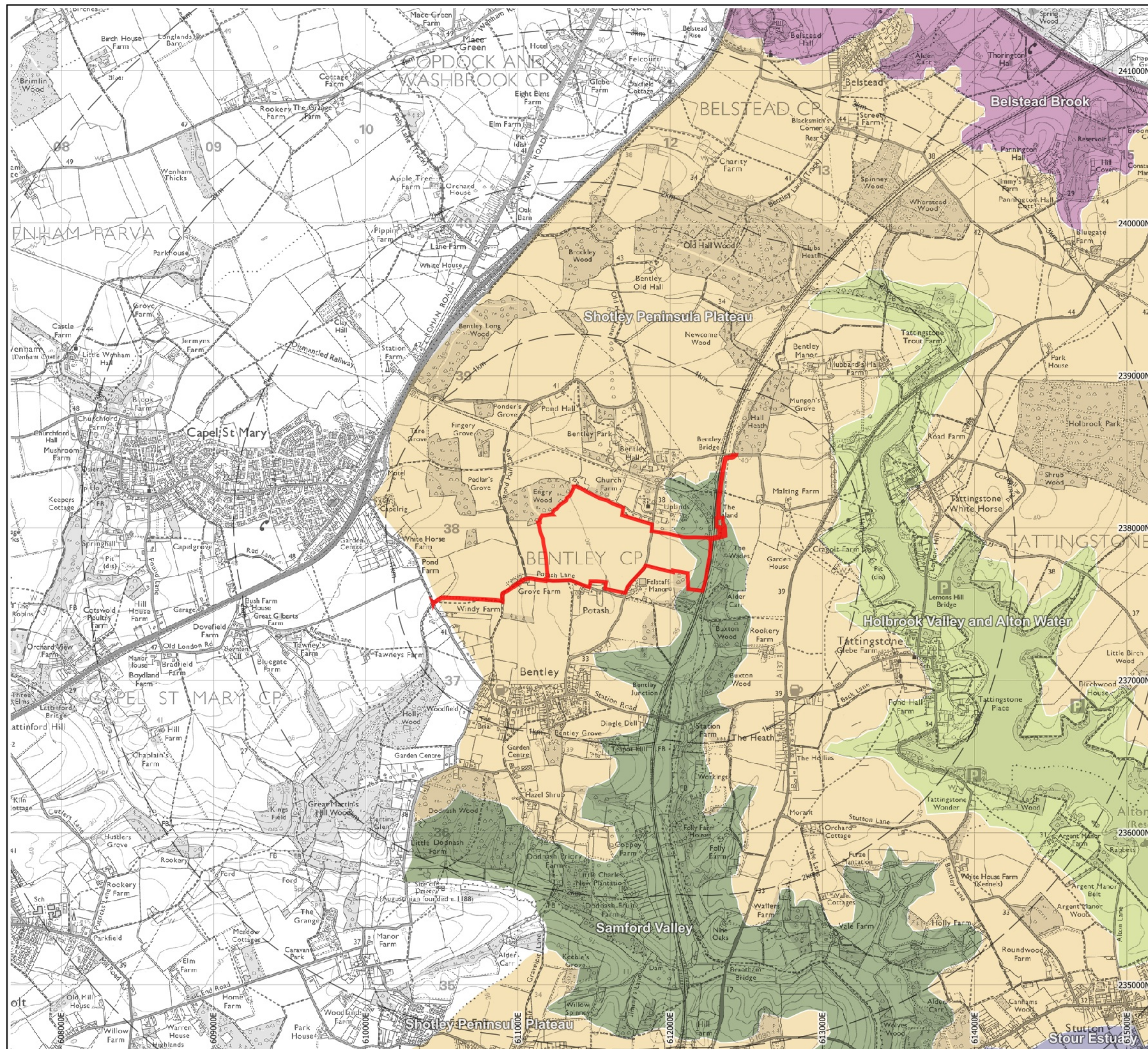
Suffolk and Joint Babergh & Mid Suffolk LCAs

- Ancient estate claylands
- Ancient estate farmlands
- Plateau estate farmlands
- Plateau farmlands
- Rolling estate farmlands
- Rolling valley farmlands

Data from Suffolk Landscape Character Assessment
and Joint Babergh and Mid Suffolk District Council
Landscape Guidance 2015

1:25000





MB FIGURE 4. SUB DISTRICT CHARACTER



PROJECT
Grove Farm Bentley solar farm

CLIENT
Babergh District Council

DATE
25/11/2025

Legend

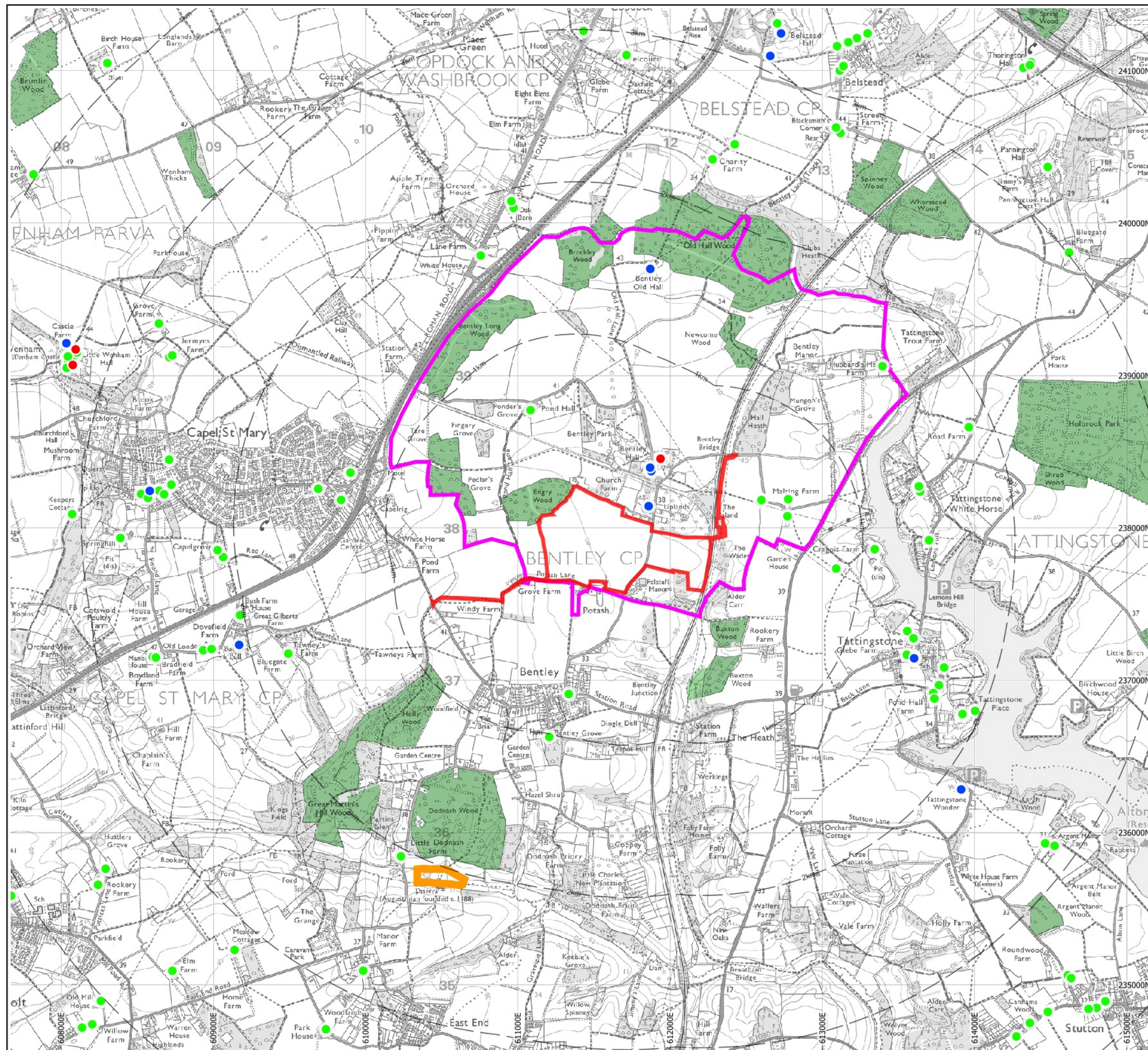
Shotley Peninsula and Hinterland LCA

- Belstead Brook
- Holbrook Valley and Alton Water
- Samford Valley
- Shotley Peninsula Plateau
- Stour Estuary

Data from Shotley Peninsula and Hinterland
Landscape Character Assessment, by Alison Farmer
Associates, 2013

1:25000





MB FIGURE 5. BENTLEY CONSERVATION AREA



PROJECT
Grove Farm Bentley solar farm

CLIENT
Babergh District Council

DATE
25/11/2025

Legend

- Site
- km_offset_lines
- Grade I Listed Building
- Grade II* Listed Building
- Grade II Listed BUILDING
- Conservation Areas
- Scheduled Monuments
- Ancient Woodland

1:25000

1 0 1 km

MB APPENDIX 2

Methodology



Methodological Approach for Landscape and Visual Assessment

Introduction

1. The methodology used by Michelle Bolger Expert Landscape Consultancy (MBELC) when preparing evidence on landscape and visual issues is based on *Guidelines for Landscape and Visual Impact Assessment*, Third Edition 2013 (GLVIA3) prepared by the Landscape Institute/Institute of Environmental Management and Assessment. It also takes account of the 2024 Technical Guidance Note (TGN), *Notes and Clarifications on Aspects of GLVIA3* (LITGN 01/24). The methodology also identifies where the approach adopted has been informed by the consideration of specific landscape or visual issues by the courts or by inspectors at public inquiry.
2. Landscape/ townscape effects are effects on the fabric and character of the landscape/ townscape. Visual effects are effects on people and are concerned with the impact of the proposals on the amenity of those people who will experience visual changes as a result of the proposals.
3. GLVIA3 sets out the processes that should be followed in the preparation of a Landscape and Visual Impact Assessment (LVIA), required for development that is the subject of an Environmental Impact Assessment (EIA), and for a Landscape and Visual Appraisal (LVA) required for development that is not the subject of an EIA. Regarding the differences between a LVIA and a LVA, GLVIA3 states that '*the overall principles and the core steps in the process are the same*'¹ and sets out the differences in defined procedures as follow:
'As a 'standalone' appraisal the process is informal and there is more flexibility, but the essence of the approach - specifying the nature of the proposed change or development; describing the existing landscape and the views and visual amenity in the area that may be affected; predicting the effects, although not their likely significance; and considering how those effects might be mitigated - still applies'.²

¹ Guidelines for Landscape and Visual Impact Assessment, 2013 Page 26 Paragraph 3.2

² Guidelines for Landscape and Visual Impact Assessment, 2013 Page 26 Paragraph 3.2

Baseline Assessment

4. GLVIA3 sets out the factors that should be considered in establishing a study area and determining the baseline conditions. (GLVIA3 Page 32 Paragraphs 3.15-3.17) *‘For the landscape baseline the aim is to provide an understanding of the landscape in the area that may be affected - its constituent elements, its character and the way this varies spatially, its geographic extent, its history (which may require its own specialist study), its condition, the way the landscape is experienced, and the value attached to it.’*³
5. The **value** of a landscape is: *‘the relative value that is attached to different landscapes by society, bearing in mind that a landscape may be valued by different stakeholders for a variety of reasons...A review of existing landscape designations is usually the starting point in understanding landscape value but the value attached to undesignated landscapes also needs to be carefully considered’.*⁴
6. The National Planning Policy Framework (NPPF) (revised December 2025) in paragraph 187 states that:
‘Planning policies and decisions should contribute to and enhance the natural and local environment by: (inter alia)
a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);
7. Valued landscapes include nationally and internationally designated landscapes. The statutory status of nationally designated landscapes is set out in the National Parks and Access to the Countryside Act 1949 and the CROW Act 2000. This status is reflected in NPPF Paragraph 189 and local planning policies.
8. NPPF paragraph 187 Valued Landscapes are not restricted to designated landscapes. LITGN 02/21 *Assessing landscape value outside national* expands on the advice in GLVIA3. Table 1 in LITGN 02/21 includes a range of factors that can be considered when identifying landscape value. It is useful in determining which aspects of a site /landscape are important to protect or enhance. Table 1 builds on the assessment of value as set out in GLVIA3 Box 5.1. LITGN 02/21 confirms that:
‘When assessing landscape value of a site as part of a planning application or appeal it is important to consider not only the site itself and its features/

³ Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013, Page 32, Paragraph 3.15

⁴ Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013, Page 80, Paragraph 5.19

*elements/characteristics/qualities, but also their relationship with, and the role they play within, the site's context. Value is best appreciated at the scale at which a landscape is perceived - rarely is this on a field-by-field basis.'*⁵

9. Judgements about the value of a landscape are recorded on a verbal scale of high, medium and low with an overall conclusion that if the landscape in which a site is located has 'high' value this is likely to equate to a NPPF paragraph 180 'Valued Landscape'.

Landscape Effects

10. Landscape effects can be effects on the fabric of the landscape or on landscape character. Effects on landscape character often extend beyond the site itself and are usually a consequence of visual changes which affect the pattern and character of the landscape.
11. The assessment of the **sensitivity** of the landscape is directly related to the type of development proposed. Landscape Sensitivity is derived from: '*combining judgements of their [the landscape receptors'] susceptibility to the type of change or development proposed and the value attached to the landscape*'⁶. As identified above, the value of the landscape is assessed as part of the baseline, whereas the assessment of the susceptibility to change of a landscape must be tailored to individual projects and '*should not be recorded as part of the landscape baseline but should be considered as part of the assessment of effects*'.⁷
12. The **susceptibility to change** of a landscape is: '*the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or areas, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of landscape planning policies and strategies*'.⁸ Judgements about the **susceptibility** of the landscape are recorded on a verbal scale of high, medium and low and the basis for the judgements is made clear and linked back to evidence from the baseline study as required by GLVIA Para 5.43.

⁵ Assessing landscape value outside national designations TGN 02/21 Paragraph 2.4.5 Bullet Point 5

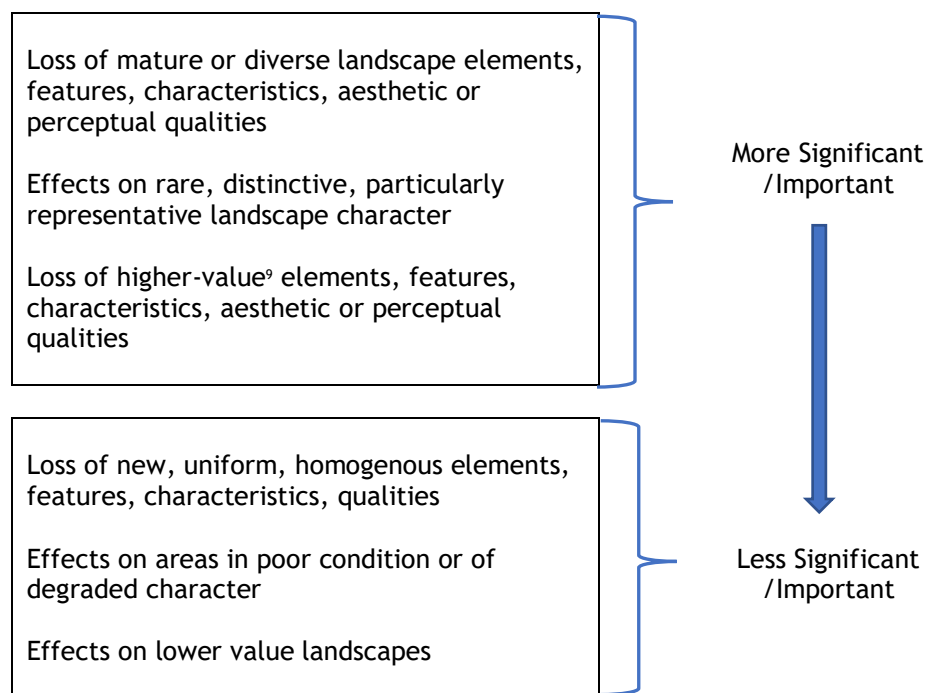
⁶ Guidelines for Landscape and Visual Impact Assessment, 2013 Page 88 Paragraph 5.39

⁷ Guidelines for Landscape and Visual Impact Assessment, 2013 Page 89 Paragraph 5.42

⁸ Guidelines for Landscape and Visual Impact Assessment, 2013 Page 88 Paragraph 5.40

13. Judgements about **sensitivity** of the landscape are a result of combining judgments regarding value and susceptibility. This is recorded on a verbal scale of high, medium and low and the basis for the judgements is made clear.
14. Judgements about the **magnitude of change** for landscape effects are recorded on a verbal scale of high, medium, low and negligible, based on the principles set out in GLVIA3 paragraphs 5.48-5.52 which includes a consideration of scale, geographical extent and the duration and reversibility of the landscape effects.

Judgements about the level of landscape effects, are recorded on a verbal scale of major, moderate, minor and negligible, based on the principles set out in GLVIA3 paragraphs 5.53-5.57. The underlying principles are summarised in GLVIA Figure 5.10 (Page 92) which has been adapted below.



*Figure 1 - Scale of Significance/Importance
(Derived from GLVIA3 Figure 5.10 Page 92 Scale of Significance)*

⁹ The Figure on Page 92 says 'loss of lower-value elements', but this is an error in the text identified in GLVIA3 Statement of Clarification 2/13 8-07-13. It should read 'Loss of higher-value elements'.

15. The reasons for reaching the final judgments on landscape effects are always made clear in the text. However, the following diagram in Figure 2 can assist in understanding the way in which the judgments regarding landscape sensitivity and magnitude of change are combined to reach a final judgment on the level of the landscape effects.

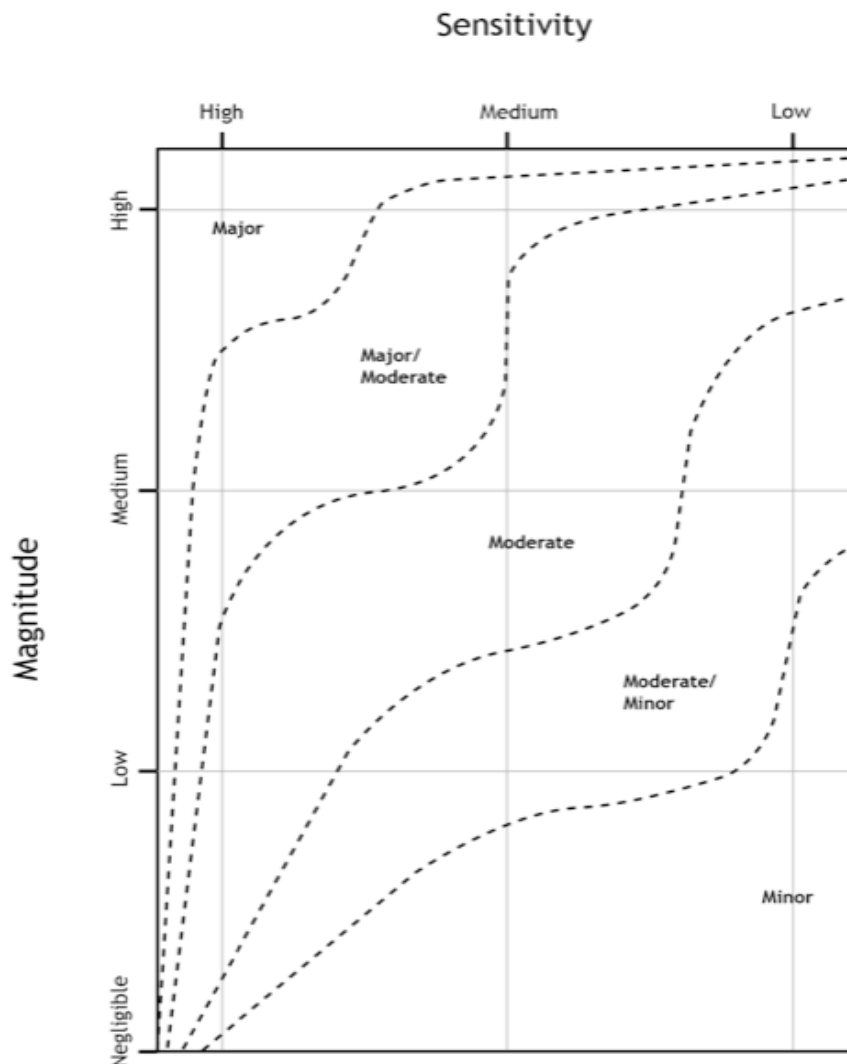


Figure 2 (MBELC) - Level of Effects

16. Identifying whether effects are significant is only required for LVIA3. LITGN 24/01 states that *'it is not necessary to establish thresholds for levels of significance, provided that it is made clear whether effects are, or are not, significant. However, typically, effects falling below the middle of the range of overall effect are assessed as not significant.'*¹⁰

¹⁰ Notes and Clarifications on Aspects of LVIA3 Section 3(5)

Visual Effects

17. Judgments about visual effects are derived from a consideration of the sensitivity of visual receptors to the proposed development, and the magnitude of change to their existing visual amenity. Changes in landscape character may also be a result of visual changes but these are considered under landscape effects.
18. GLVIA3 provides guidance on the relative sensitivity of different visual receptors (GLVIA3 paragraphs 6.31-6.37). In summary, the most sensitive receptors are:
 - Residents at home;
 - People engaged in outdoor activities whose attention is focused on the landscape and view; and
 - Visitors to locations where views are an important part of the experience.
19. The least sensitive receptors are:
 - People engaged in outdoor sports or activities which do not depend on an appreciation of views; and
 - People at their place of work (although this can vary).
20. The sensitivity of road users varies. People on busy or main routes are considered to have medium or low sensitivity, whilst users of rural roads or scenic routes will have medium or even high sensitivity.
21. Judgments are recorded on a verbal scale of high, medium and low. Visual receptors who would be affected by the development are identified in groups and their sensitivity assessed combining issues relating to their susceptibility and the value attached to the views affected.
22. Judgments about the **magnitude of change** for visual effects are recorded on a verbal scale of high, medium, low and negligible based on the principles set out in GLVIA3 paragraphs 6.38-6.41 which includes a consideration of scale, geographical extent and the duration and reversibility of the visual effects.
23. *‘Significance of visual effects is not absolute and can only be defined in relation to each development and its specific location’¹¹*. Judgments about the level of visual effects are recorded on a verbal scale of major, moderate, minor and negligible, based on the

¹¹ Guidelines for Landscape and Visual Impact Assessment, 2013 Page 115 Paragraph 6.42

principles set out in GLVIA3 paragraphs 6.42-6.45. The underlying principles are summarised in Paragraph 6.44:

‘There are no hard and fast rules about what makes a significant effect, and there cannot be a standard approach since circumstances varied the location and context and with the type of proposal. In making a judgement about significance of visual effects the following points should be noted:

- *Effects on people who are particularly sensitive to changes in views and visual amenity are more likely to be significant.*
- *Effects on people at recognised and important viewpoints or from recognised scenic routes are more likely to be significant.*
- *Large-scale changes which introduce new, non-characteristic or discordant or intrusive elements into the view are more likely to be significant than small changes or changes involving features already present within the view.’¹²*

24. The reasons for reaching the final judgments on visual effects are always made clear in the text. However, Figure 2 above can assist in understanding the way in which the judgments regarding visual receptor sensitivity and magnitude of change are combined to reach a final judgment on the level of the visual effects.

Final Notes

25. MBELC adopts a narrative approach to LVA. As set out in LITGN 24/01 ‘A clear professional judgement needs to be communicated, evidenced and robustly justified in the LVIA in order for decision-makers to weigh up any harm against the benefits of the development in the planning balance.’
26. Intermediate judgements such as medium/high or minor/moderate are also used in the assessments where the judgment falls between two levels. Where such a judgement is reached there is no intended difference to be derived from which judgment comes first - so medium/high is the same as high/medium and moderate/major the same as major/moderate.

Last Updated February 2025.

¹² Guidelines for Landscape and Visual Impact Assessment, 2013 Page 116 Paragraph 6.44

MB APPENDIX 3

Review of Alternative Sites Assessment

Review of Updated Alternative Sites Assessment

The Table below analyses the reasons behind the conclusions of the Updated Alternative Sites Assessment.

	Appeal Site	C1	C2	F2	F3	H2/3
Public Rights of Way	Not crossed by PRow but Church Road, a historic 'Quiet Lane' runs through the site.	<i>crossed by a number of public rights of way that would be incorporated into the Scheme, however the routes would be channelised through the solar farm and consequently there would be a notable loss of amenity.</i>	<i>crossed by a number of public rights of way that would be incorporated into the Scheme, however the routes would be channelised through the solar farm and consequently there would be a notable loss of amenity</i>	<i>not crossed by public rights of way, but has footpaths around its boundary in a similar way to the Application Site. Public rights of way are a neutral differentiator.</i>	<i>crossed by Public Rights of Way, including a Public Bridleway, that would be incorporated into the scheme, however the routes would be channelised through the solar farm and consequently there would be a notable loss of amenity.</i>	<i>crossed by public rights of way that would be incorporated into the Scheme, however the routes would be channelised through the solar farm and consequently there would be a notable loss of amenity.</i>
Relationship to Suffolk Coast and Heaths NL	Not immediately adjacent to the Suffolk Coast and Heaths NL.					<i>adjacent to the AONB to its southern boundary, and it is therefore potentially within the setting of the AONB for purpose of NPPF Paragraph 176. in close proximity to Tattingstone and Alton Water to its east.</i>

	Appeal Site	C1	C2	F2	F3	H2/3
Topography	Western part of the site is relatively flat. The Eastern part is more noticeably sloping.	<i>across sloping topography, likely to notably increase its zone of visual influence compared to the Application Site, and reduces options for using planting to provide screening.</i>	<p><i>flat topography of arable fields.</i></p> <p><i>The zone of visual influence is likely to be slightly greater than the Application Site due to the more open boundaries to the north and west.</i></p> <p><i>[Check]</i></p> <p><i>Mitigation planting has the potential to be effective in reducing some significant effects due to the flat topography in the medium- to long-term,</i></p>	<p><i>Site F2 has flat topography of arable fields,</i></p> <p><i>The site boundaries are open to the road to the south, and to Old Hall Lane to the west, which increases its visibility</i></p> <p><i>The zone of visual influence is likely to be slightly greater than the Application Site due to the more open boundaries to the south and west. There would be open views from the public footpaths to the west and north where recreational users of the countryside will have their experience of views across the landscape changed. Mitigation planting has the potential to be effective in reducing some significant effects due to the flat topography in the medium- to long-term, however the visual experience for nearby footpaths would be altered.</i></p>	<p><i>Site F3 has flat topography of arable fields</i></p> <p><i>The zone of visual influence is likely to be comparable to the Appeal Site due to the similar lack of open boundaries. There would however be open views from public footpaths that traverse the site.</i></p> <p><i>Mitigation planting has the potential to be effective in reducing some of the significant effects due to the flat topography in the medium- to long-term,</i></p>	<p><i>Aerial imagery suggests that Site H3 comprises a patchwork of small to large-scale arable fields. Smaller fields are more susceptible to change from solar development. The sensitivity of Site H3 would be higher than the Application Site. Development at Site H3 would likely detract from peoples experience of visiting these areas, including for footpaths across the Site. Mitigation planting has the potential to be effective in reducing some significant effects due to the broadly flat topography in the medium- to longterm, however</i></p>

	Appeal Site	C1	C2	F2	F3	H2/3
Proximity to heritage assets	Within the Bentley CA and important heritage assets to the north	Not mentioned as relevant to the L & V assessment	Not mentioned as relevant to the L & V assessment	<i>There are important heritage assets to the north and south of the Site.</i>	Not mentioned as relevant to the L & V assessment	Not mentioned as relevant to the L & V assessment
Valued Landscape	Independent studies have suggested that the site is within a valued landscape.	Not mentioned	Not mentioned	Not mentioned	Not mentioned	<i>Development of solar at Site H3 would result in adverse impact in relation to the Site's position in the setting of the AONB, and Alton Water to its east (which likely has many of the characteristics of a 'valued landscape').</i>
Proximity to PRoW	Not crossed by PRoW but Church Road, a historic 'Quiet Lane' runs through the site	<i>crossed by public footpaths, recreational users of the countryside will have their experience of views across the landscape substantially changed.</i>	<i>There are public footpaths crossing the Site where recreational users of the countryside will have their experience of views across the landscape substantially changed. ... however the visual experience for footpaths crossing the Site would be fundamentally different.</i>		<i>There would however be open views from public footpaths that traverse the site where recreational users of the countryside will have their experience of views across the landscape changed.</i>	<i>the visual experience for nearby footpaths would be altered.</i>
Proximity to modern development	Very little modern development in close proximity except the railway line and pylon line on the eastern boundary	<i>in close proximity to a dual carriageway and crossed by overhead pylons.</i>	<i>crossed by overhead power lines.</i>	<i>is crossed by overhead lines to its south-west.</i>		Not mentioned

	Appeal Site	C1	C2	F2	F3	H2/3
Landscape Sensitivity (Updated ASA)	Assessed in my evince as medium/high.	<i>Overall the receiving landscape character is likely to be of slightly reduced sensitivity than the Application Site. But Mitigation is not likely to be effective in reducing all significant effects, principally due to the topography and the footpaths crossing the site.</i>	<i>The receiving landscape character is likely to be of similar sensitivity as the Application Site.</i>	<i>The Site is overall likely to be of a comparable or slightly higher sensitivity than the Application Site.</i>	Not mentioned	Not mentioned
Overall Conclusion (Updated ASA)		<i>The Application Site is judged to be a slightly better option than Site C1. Alternative Site has some disadvantage(s) compared to the Application Site</i>	<i>The Application Site is judged to be a slightly better option than Site C2. Alternative Site has some disadvantage(s) compared to the Application Site</i>	<i>The Application Site is judged to be a slightly better option than Site C2 due to its greater existing enclosure and limited visibility.</i>		<i>Overall, Site H2/H3 does not have any obvious benefits over the Appeal Site, with a number of neutral differentiators between the sites. There remain notable disadvantages to Site H2/H3 in relation to landscape and visual impact and the public right of way network that are not improved by including Site H2 within the assessment</i>

	Appeal Site	C1	C2	F2	F3	H2/3
MB Comment		I agree that the landscape character is less sensitive. Updated ASA continues gives more weight to visual impact, but greater weight should be given to the sensitivity of the landscape. LVIA had not correctly understood the landscape sensitivity of the appeal site.	I do not agree that landscape in which this site is located has similar landscape sensitivity to the appeal site. I consider that the appeal site has greater landscape sensitivity. As well as the LVIA underestimating the landscape sensitivity of the appeal site, visual impacts have been given precedence over landscape impact	Agree that appeal site is slightly better but not due to existing enclosure and limited visibility but because it is located in an area that is even more intact and has even greater landscape value than the site.	I agree that site F3 has no notable landscape or visual benefits compared to the Appeal Site	I agree that site H2/3 is less suitable than the site due to its proximity to the Suffolk Coast and Heaths NL
MB Conclusions		C1 has less landscape sensitivity than the appeal site and slightly greater visual sensitivity. Overall, I consider that Site C1 is preferable to the appeal site from a landscape and visual perspective.	C2 has less landscape sensitivity than the appeal site and slightly greater visual sensitivity. Overall, I consider that Site C2 is equivalent to the appeal site from a landscape and visual perspective.	I agree the appeal site is preferable from a landscape and visual perspective.	I agree the appeal site is preferable from a landscape and visual perspective.	I agree the appeal site is preferable from a landscape and visual perspective.



Michelle Bolger Expert Landscape Consultancy Ltd

Company Registration No. 09809868

VAT Registration No. 224 2598 12

Registered Office: 35 Pickford Road Bexleyheath DA7 4AG

0208 303 2102

07803 591 478

Michelle@michellebolger.com

www.michellebolger.com