

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

Grove Solar Farm, Bentley, Suffolk

REBUTTAL EVIDENCE

OF

ALISON FARMER

BA, MLD, CMLI

Landscape and Heritage Issues

On behalf of

Bentley Parish Council and Stop Grove Farm Solar

January 2026

1.0 Introduction

1. In this rebuttal evidence I respond to parts of the proof of evidence of Ms Garcia (heritage) and Mr Mason (landscape). I consider heritage matters first, but only in relation to the Conservation Area and not in relation to setting impacts on the built heritage (where the Rule 6 Party relies upon the evidence of the Council). I then consider landscape matters. The fact that I have not responded to all parts of the heritage or landscape evidence submitted by the Appellant does not mean that I necessarily agree with them on those matters.
2. The evidence that I provide in this rebuttal proof is true and I confirm that the opinions expressed are my true and professional opinions.

2.0 Heritage Issues

Potash Lane and the Southern Boundary of the Conservation Area

3. Ms Garcia mentions Potash Lane repeatedly in her evidence. At paragraph 6.12 she asserts it is not a medieval road, at paragraph 4.6 it is a post-medieval road not shown on mapping prior to 1805 and at paragraph 6.15 it is a 19th century road. In relation to the reference in the CAAMP, that Potash Lane reflects the alignment of the Hundred Way, she asserts there is no evidence for this. My proof (Appendix 1) sets out the evidence from the 1613 Survey that Potash Lane is much older than 1805 and Edward Martin, to whom I defer on this matter, considers it likely to be Saxon in origin.
4. Ms Garcia considers that the justification for the boundary of the Conservation Area is weak (paragraph 4.6) and that the southern boundary of the Conservation Area has been drawn arbitrarily (paragraph 6.13). She concludes this on the basis that Potash Lane is not medieval and that land associated with Falstaff Manor extended to the south of Potash Lane. She concludes that the Conservation Area boundary does not follow a line which reflects this historic association with Falstaff Manor (paragraph 6.13). The issue relating to the antiquity of Potash Lane has been addressed above. In terms of the association with Falstaff Manor, this is not stated to be a determining factor relating to the extent of the Conservation Area. The CAAMP (CD F1) is clear at page 4 that the significance of the Conservation Area relates to landscape which

expresses an ancient manorial structure still evident today, including three of the four manor houses that formed the Tollemache Estate at its zenith. It is true that it does not include all of the landscape historically associated with Falstaff Manor nor the lands at Dodnash to the south (which was the fourth manor). My interpretation of the CAAMP is that the fields to the south of Potash Lane were not regarded as expressing the intact manorial structure that is evident within the defined Conservation Area, as they have been eroded by estate development to the south. The designated southern boundary includes the historic route of Potash Lane and also the non-designated heritage assets of Potash Farm/Cottages and Red House/Cottages and the associated enclosure to the south. Whilst I was not involved in the Conservation Area Appraisal or designation, my knowledge of the area and review of the CAAMP, leads me to conclude that the southern boundary is rational and well considered. I understand that it was not challenged following designation.

Change and “Ordinary” Farmland

5. Landscapes and settlements contain an imprint of past activity reflected in features and the patterns they create. All landscapes and settlements change through time. What makes some landscape/settlements stand out from others is the extent to which, despite change, patterns still reflect earlier layout and management, where historic elements, the open spaces they define and patterns created, can be perceived in the present day, creating a distinctive place or character. Conservation Area designation is a means of giving recognition to these special places.
6. All parties agree that internal field enclosures have been lost from the Appeal Site. The extent to which they were ever very extensive is not known (I return to this latter in this rebuttal when considering landscape). Nevertheless, the CAAMP highlights that the loss of pattern is limited as a result of the surrounding historic routes and ancient woodland which define the spaces (both relevant to the Site and wider Conservation Area), such that the jigsaw of shapes still remain discernible and the rural manorial structure and character persists.
7. I disagree with Ms Garcia’s conclusion at paragraph 6.18 that the description in the CAAMP could be used to describe any group of fields in England and that the patterns of fields here and their development is commonplace throughout England.
8. In addition to the manorial structure still evident in the landscape, this area also has connection with the Tollemache family and with it, significant documentary evidence,

which enables the landscape features within the Conservation Area to be more fully understood. This again distinguishes this area from the ordinary.

Guidance on Conservation Areas

9. Conservation Areas are designated for special architectural and/or historic interest. Conservation Areas which include landscape are more likely to have special historic interest as is the case for the Bentley Conservation Area. Ms Garcia implies, through the use of images in her proof, that the identified views in the CAAMP show no architectural interest and therefore do not justify Conservation Area status (paragraph 6.82). This, in my view, misses the point of the Conservation Area and the significance of the landscape elements and the spaces they enclose. In my view, this is consistent with the identification of these views in the CAAMP – Historic England Advice Note 1 (CD F6) paragraphs 58-60 sets out how views are helpful in identifying key features and in experiencing significance of a Conservation Area. It highlights the importance of approaches along historic routes or visual connections between different areas that illustrate an important historic relationship. It is clear from Ms Garcia's statement in paragraph 6.28 and her commentary on images in her proof that she has not applied this understanding to her assessment of the Site. I note that Ms Garcia describes the historic routes at paragraph 6.37 as *'secluded and enclosed in character'* and that *'there are gaps in hedgerows that do allow some glimpses but in general, these routes are well-enclosed by tall hedgerows meaning that the view is focused on the road ahead'*. I will return to views across the Site from the adjacent historic routes later in this rebuttal.
10. Returning to Historic England Advice Note 1 (CD F6), there is no requirement for a Conservation Area to be a particular size, nor to include all land which was once in a particular ownership nor for ownership to last for a particular period of time. The fact that the Conservation Area does not include geographically separate land associated with Dodnash Manor or only part of Falstaff Manor does not diminish the significance of the area. Similarly, the precise number of centuries for which the Tollemache family may have owned Falstaff Manor does not reduce the significance of the Conservation Area or diminish the rationale for its extent. Furthermore, the views of a member of the Tollemache family regarding Bentley (paragraph 6.23 of Ms Garcia's Proof) are also not material to defining the significance of this landscape in heritage terms. The significance of the Conservation Area is not dependant for the Tollemache connection to be unbroken through time; rather, Tollemache ownership and stewardship provide

an overarching theme and connection which touches most of the land within the Conservation Area.

11. In any event, my proof of evidence sets out, through the transcription of the 1613 survey, that the Site was associated not just with Falstaff Manor but also Bentley Church House Manor to the north, a connection which Ms Garcia has not considered. Whilst the map in the CAAMP labels the western field as manorial farmland, it is evident from this mapping that both the western and eastern fields were associated with the manors.

Contribution of the Site to the Significance of the Conservation Area

12. Guidance on defining Conservation Areas (HE Advice Note 1 CD F6) includes reference to the spatial element of an area made up of settlement pattern (but equally landscape pattern) including green spaces. The green space of the Appeal Site is defined by historic assets which flank the fields and which enable the articulation and relationships of landscape features to be perceived. The Site, in association with other historic landscape features and buildings, forms an essential component of the wider Conservation Area and the southern part of the manorial landscape. To consider the open land of the Site in isolation is to fail to appreciate the historic interest. The historic routes, buildings and ancient woodland and the pattern they create is experienced in large part through the open rural character and appearance of the intervening agricultural land. This applies to the Site as well as other parts of the Conservation Area.
13. Ms Garcia concludes at paragraph 6.72 that the Site makes only a negligible contribution to the Conservation Area. However, as set out in my proof, it is evident from an understanding of the significance of the Conservation Area, that this significance is especially well expressed in the area of the Site. For this reason, I disagree with Ms Garcia at paragraph 6.47 that *'the site is green space but not essential component of a wider historic area'* and at paragraph 6.50 that *'the site does not contribute to the significance of the asset in the same way as other areas'*. In my view the Site, and its environs, makes a particular contribution to the significance of the Conservation Area, forming the southern part of the manorial landscape as defined by the Conservation Area boundary. If Ms Garcia accepts (paragraph 6.48) that historic field patterns and layouts can demonstrate historic interest through their character and

appearance, it is unclear why historic routes and ancient woodland—features that define the fields affected by the proposed development—are not also considered capable of demonstrating historic interest through character and appearance. These elements form an enduring historic framework which is perceived and experienced as a result of the openness of the fields. In terms of the eastern field, its extent is not a reflection of the railway, as can be seen from historic maps that predate the railway, but a reflection of the valley topography to the east.

14. Consequently, the Appeal Site cannot reasonably be equated to an undeveloped modern agricultural field with no visible historic layout. The absence of internal subdivisions does not negate the presence of a tangible and appreciable historic landscape structure, and the Site therefore continues to demonstrate historic interest through its character and appearance.
15. The two fields of the Appeal Site which will accommodate solar panels form the southern part of the Conservation Area. The immediate environs of the fields contain two historic manor houses (Falstaff and Bentley [Church] House) and the Church. The route of Church Road comprises the southern approach between the village of Bentley and the Church, and the lanes and woodland which define the fields are clearly of antiquity. These fields function as a visual and spatial hinge, allowing the manorial structure of the landscape to be read. Whilst other parts of the Conservation Area also reflect manorial structure, the southern part of the Conservation Area includes a concentration of features, and the pattern and relationships generated, are unique within the Conservation Area. There is no other part of the Conservation Area that has the combination of four interconnecting historic routes, association with the Church and ancient woodland and the main approach between Church and village. Given the significance of the Conservation Area as defined in the CAAMP (page 4) I consider this part of the Conservation Area to make an especially important contribution to the significance of the Conservation Area.

Impact of the Proposed Development on the Significance of the Conservation Area

16. Ms Garcia's notes the importance of considering harm in relation to the conservation area as a whole (Paragraph 6.73). At paragraph 6.84 she sets out the reasons why and reaches a number of conclusions about impact and I consider each in the table below:

Ms Garcia's conclusion and justification	AF Commentary
Appeal Site makes a negligible contribution to the significance of the CA as a whole	Ms Garcia adopts a reductionist approach to reach this conclusion considering the open fields in isolation to the pattern of historic features of which they are a part and which collectively contribute to the character and appearance of the Conservation Area.
The spatial area subject to the temporary change will be minimal given the size of the CA as a whole	Ms Garcia considers the extent of the CA affected is 5.6% (para 6.74). Mr Handcock considers it to be 7.9%. In any event NPPG states that it is the degree of harm to the asset's significance rather than the scale of the development that is to be assessed.
The last agricultural field associated with the Tollemache estate would not be removed	This implies that the significance is only affected once you get to the last field. This cannot be the case. Each agricultural field makes its own contribution to the significance of the Conservation Area, and the fields associated with the Appeal Site make a particular contribution as noted above.
The last area of Manorial farmland would not be removed	Ditto
Association with Falstaff Manor is only appreciated through documentation and is not experienced through the character and appearance of the Site	The significance of the CA is not tied to the Falstaff Manor connection. The documentary evidence associated with Falstaff Manor and indeed Bentley Church House Manor and the Tollemache Estate adds to an appreciation of the historic elements/patterns evident in the Conservation Area and therefore to an appreciation of its character and appearance.
The Site affects only a part of the Falstaff Estate	The significance of the Conservation Area is not dependant on the extent of the Falstaff Estate. The physical extent of land effected is not the test, the extent to which significance is impacted is.
Any harm is temporary	I address the temporary nature of development in my proof.

17. In assessing the harm of the proposed development, Ms Garcia at paragraph 6.77 makes reference to the Thaxted decision where the Inspector concluded solar arrays would sit on top of land and it would still be apparent that the arrays are located on former agricultural fields. In my view, the Thaxted case is not the same, as it relates to the setting of a heritage asset and function. In contrast the Appeal Site falls within the Conservation Area and, as noted above, the openness of the Site is fundamental to understanding the structure of the manorial landscape – this is not the same as an agricultural setting to a listed building. In terms of views to the development, again Thaxted appears to be a different scenario with the Inspector commenting on medium distance views. At Bentley the views would be adjacent to the development, from the historic routes, although I note that Ms Garcia does not consider these routes as heritage assets (paragraph 6.82) even though they are clearly referred to as such in the CAAMP. Views would be across solar panels and ancillary development, and although set back from the lanes in places, these elements would still be perceived as materially taller than the viewer. Furthermore, mitigation planting would not retain perceived openness.
18. Ms Garcia concludes (para 6.33) that the view of the Church from Potash Lane does not illustrate its topographical position. I disagree. The APA Valued Landscape Assessment (CD G9 page 16) describes the *'historic pattern of church and hall complexes siting isolated within a wider rural landscape remains intact'*. This is precisely what this view demonstrates. Ms Garcia also states at paragraph 6.36 there are no footpaths through the Site. Whilst there may be no Public Rights of Way, Church Road is a Quiet Lane, is well used by pedestrians and forms the primary route to church from the village to the south. This route would pass through the centre of the solar farm.
19. Ms Garcia at paragraph 6.38 states that the removal of the hedgerow on Church Road will result in an 'opportunity' to view the Site and that views would not be towards heritage assets. This is surprising given the view is towards Engry Wood and the CAAMP lists Engry Wood as a heritage asset (page 31). The same is true of The Wades to the east.
20. At paragraph 6.77 Ms Garcia agrees that the Appeal Scheme would represent a change in the character of land within the Site. As set out in my proof of evidence, it would also physically impact the historic lanes, alter the character and experience of

the lanes and the approach to the Church from the south, as well as impacting the setting of the Church (as set out in Mr Handcock's proof). The mitigation planting would leave a legacy largely unrelated to the current historic structure¹ and all these aspects would collectively harm the character and appearance of the Conservation Area.

Substantial or less than substantial harm

21. Ms Garcia does not find substantial harm a credible conclusion (para 6.88). She refers to the NPPG and case law to explain why. She states at paragraph 6.95 that '*The CAAMP does not seek to set out anywhere that it is the fields of the Site which are the primary reason or key reason for the designation of this Conservation Area*'. However, the CAAMP at page 37 is clear that '*Bentley Conservation Area's significance is inherently linked with its open rural aspect and the relationships between buildings, some deliberate, many incidental. Of particular note are the proliferation of public footpaths and bridleways which allow direct access or views of almost all parts of the conservation area..... Wide areas of open landscape form a significant feature of the conservation area. These fields and manorial grounds are reflective of historic land uses dating back to at least the medieval period.*' It also goes on to state (page 78) that '*the Quiet Lanes....make a significant contribution to the overall character and appearance of the historical significance of the Bentley Conservation Area.*'

[emphasis added]

22. I set out above why I consider the Appeal Site to make a particular and unique contribution to the open rural aspect of the Conservation Area. I therefore disagree that the development of two fields as a solar farm will cause only a temporary change to one small element of the manorial farmland. For clarity, I explain the reasons why I consider the harm to be substantial below.
23. Substantial harm does not require **total loss** of a heritage asset. It can arise where development would seriously affect a key element of the asset's significance.

¹ I have measured the length of proposed hedgerow planting which would follow an historic alignment utilising Mr Mason's Figure 3c, and it equates to c. 1070 meters. I have not included hedgerow which reinforces an existing hedgerow along adjacent lanes. I have calculated the total new hedgerow planting as c.2380 meters (not c.2500 meters as stated by Mr Mason paragraph 4.4.8) and therefore the reinstatement of historic hedgerow equates to just c. 45% of all new hedgerow planting.

24. I accept that substantial harm does not arise simply because harm exists. In this case I consider substantial harm arises because:

(1) The Site is a key component of significance – it is not a neutral or incidental parcel of land. The Appeal Site is defined by historic routes and ancient woodland; forms part of the manorial landscape framework; explains the historic relationship between settlement, movement, and land use; contributes to the legibility of historic patterns. These elements are fundamental to *why the Conservation Area is significant* (as set out in the CAAMP) and harm to them is not peripheral.

(2) The development would fundamentally alter how that significance is experienced – The development would urbanise an historically open and defining space; interrupt historic routes and the approach and setting to the Church; weaken the perceptible relationship between woodland, routes, and open land and permanently alter character.

(3) The harm would last for 40 years and is not fully reversable - The development would: remove openness for a considerable period of time; introduce planting much of which does not reflect historic patterns; permanently change how the Conservation Area is read and understood. The harm is not temporary – whilst the solar panels may be removed after 40 years, other aspects of the scheme/harm would be enduring.

25. **In my view the “only 5%” argument does not prevent substantial harm.** Case law has confirmed that substantial harm can arise from damage to a key element. The test is not a numerical one i.e. the loss of two fields and the retention of other areas of manorial farmland elsewhere in the Conservation Area. In this case the proposed development would seriously affect the southern part of the Conservation Area for the duration of the scheme – a location where the manorial framework is strongly expressed. It would, through access arrangements and mitigation planting, permanently alter the character and appearance of the landscape, overwriting the historic landscape structure.

26. The development may only occur in one part of the conservation area, but here the impact is serious as it occurs in an area where manorial structure is well expressed and on land that functions as the main southern approach to the cluster of historic dwellings

including the Church and as a setting to the Church. Development here would very much reduce the significance of the whole.

3.0 Landscape Issues

The Additional Project Area

27. Mr Mason at paragraph 7.3.1 concludes that the APA is a construct which no longer serves a purpose and is no longer relevant. This cannot reasonably be the case given it is embedded in the National Landscape Management Plan (CD E3), influences the work undertaken by the National Landscape Team² and is referred to within the Adopted Babergh Local Plan page 110 and Policy L18 (page 76/7).
28. Nevertheless, Mr Mason reaches this conclusion for a number of reasons. Firstly, he considers the desire to define the APA in order to extend the AONB has been achieved through the work of Natural England (CD G8). However, if this was the case then the most recent National Landscape Management Plan (CD E3) and Local Plan (CD E1) would no longer refer to it. Instead, the Management Plan (CD E3 page 19) describes the Additional Project Area as *'an important part of the setting of the AONB'* and as having *'links to the current AONB and the importance of a co-ordinated land management approach'* and the Local Plan (CD E1 page 110) states that that it *'contain[s] special qualities with similar landscape characteristic to the AONB.'* Both documents were written post Natural England's designation work.
29. Secondly, Mr Mason refers to Natural England's Natural Beauty Assessment (CD G8) and its assessment of the Evaluation Area G3. The maps which accompanied this assessment, and which Mr Mason was not able to access, can be found at Appendix 1 of this rebuttal. They show the extent of Evaluation Area D3, along with the concentration of assets and interest in the central part of the area. This interest is clearly described in the evaluation table of CD G3 in page 70 – 73. Mr Mason is correct to say that simply because the area around Bentley was not included in the proposed National Landscape boundary extension does not mean it lacks interest or would not qualify as a valued landscape (paragraph 7.2.6). However, I disagree with

² The National Landscape Planning Officer regularly comments and engages with developers regarding the potential impacts of development within the APA. Furthermore, recent conservation management initiatives have been undertaken in the APA working with landowners in the Parishes of Lower Holbrook, Chelmondiston and Bentley, including pond creation, hedge planting, orchard creation and stag beetle stumperies (pers comm Beverley McClean, Planning Officer Suffolk and Essex Coast & Heaths National Landscape).

his conclusion that the area in question failed because it comprises *'in very large part ordinary areas of countryside that were subject to degradation or contained detractors.'* The Evaluation Table in CD G3 clearly spells that out – the area associated with the Bentley halls and woodlands was not included because it was considered relatively small/limited in extent within a wider area which overall, lacked distinction.

Mitigation and Landscape Guidance

30. Mr Mason at paragraph 4.2.2 considers the historic fabric of the Site has been drastically eroded by the removal of all internal field boundaries and trees which appears to have taken place in the 1950s. However, the 1945 aerial photograph in my proof of evidence shows that the field divisions were not substantial or in some cases even hedgerows. This landscape is good quality land – was all arable at the 1838 tithe award and known to be prime agricultural land in the 18th and 19th centuries (CD G6, page 22) and thus unlikely to require stock proof hedges. Whilst extensive hedgerow removal post 1950's may have had a drastic effect on historic fabric elsewhere in the UK, there is no evidence to suggest this is the case at the Site.
31. Mr Mason notes at paragraph 4.2.3 that the boundary hedgerows along the lanes are somewhat gappy and suffering from lack of proactive management. However, Appendix 4 of Mr Burrell's evidence indicates the landowner has been planting and caring for the ecology at and around the Site for decades. I understand this to include annual management of the hedgerows along the lanes, as observed by local residents.
32. Mr Mason justifies the approach to mitigation planting stating (paragraph 9.4.4) it is *'not simply a matter of attempting to "hide" development'* but to implement guidelines as set out in relevant character assessments. He reiterates this at paragraph 6.5.1. I have reviewed the relevant character assessments and can find no reference to landscape enhancement through extensive hedge planting schemes. CD G4 does not state it, CD G5 does not express this and CD G6 advocates reinforcement of the historic pattern through appropriate hedgerow management (page 25). CD G7 does refer to planting/reinstating hedgerows and trees in relation to providing connected habitat corridors for dormice and stag beetles. But none advocates extensive hedge planting schemes. I accept that planting can deliver benefits for landscape and nature but this needs to be balanced with other conservation priorities especially in a landscape recognised for its historic interest.

33. At paragraph 4.4.5 Mr Mason highlights benefits of the scheme which include the creation of smaller fields to be managed as meadows. Given the small scale of these fields, they are unlikely to be farmed again as arable fields, post decommissioning. He also states at paragraph 6.5.1 that diversification of grassland accords with recommendations in published character documents. Again, I can find no reference to this in the character assessments.

Valued Landscape

34. Mr Mason does not consider the APA is a valued landscape (paragraph 3.3.12) and does not support the wording in the National Landscape Management Plan (CD E3). However, the Babergh Local Plan (CD E1) clearly states on page 110 that *'these project areas are identified in the AONB Management Plans, and significant parts of them are deemed valued landscapes.'* Furthermore, the Valued Landscape Assessment of the APA (CD G9) states that *'This assessment has revealed that whilst much of the Shotley Peninsula has a weight of evidence to demonstrate it is a valued landscape in terms of para 170a of the NPPF, there are also areas which have suffered some loss of special qualities.*' Whilst this does highlight a slight discrepancy, the important fact relevant to this appeal is that the Valued Landscape Assessment did identify the area around Bentley Hall and Church as a valued landscape (CD G9 page 18). Michelle Bolger's independent assessment and the designation of the Conservation Area at Bentley, add further weight to this view, as does the independent research and evidence of Leigh Alston and Edward Martin.
35. Furthermore, the earlier Bentley Landscape Appraisal (CD G7 Paragraph 4.7.2) sums up the qualities in this landscape at a local level. The Appeal Site, in association with the landscape which surrounds it, expresses these qualities strongly. This summary paragraph was written prior to the Conservation Area designation and prior to any application for a solar farm at Grove Farm. Many of the qualities mentioned are historic, as confirmed by the Conservation Area designation, however Mr Mason does not consider the content of the Conservation Area Appraisal (paragraph 3.3.14) and Ms Garcia has not considered historic landscape features because they are landscape elements (paragraph 6.28).
36. Mr Mason's own valued landscape assessment is site focused, defining his assessment as the Site and a 1km radius. He downplays positive qualities – for example under rarity in his assessment tables in Appendix 1 he suggests that the

cluster of heritage buildings are not rare, in contrast Ms Garcia, who considers they are (CD C1, paragraph 4.5).

37. Mr Mason at paragraph 9.2.2 records that elevated value comprises features that are either physically separate from the Site or are not dependent on the Site. This contrasts with his conclusion at paragraph 10.2.1 that the landscape surrounding the Site cannot properly be categorised as a valued landscape for NPPF purposes. His error of approach is confirmed at paragraph 8.3.2 where he acknowledges positive features in the wider area and then describes the Site as *‘an area of working, modernised arable plateau of mixed condition.’* His separation of the Site from the wider landscape when considering value is exactly what guidance on assessing landscape value warns against (CD G3 page 12 second bullet) *‘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 /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.’*

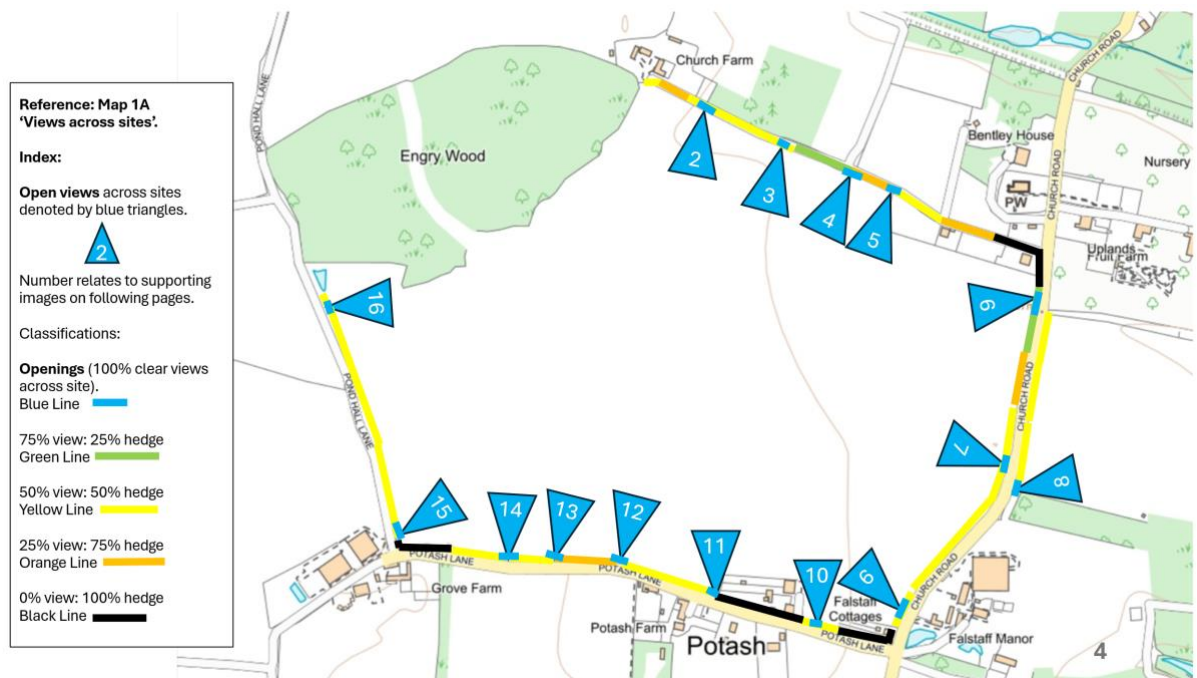
[emphasis added]

38. His conclusions on value are based on a narrow approach following a single site visit (paragraph 1.1.5).

Views

39. The map extract provided on page 21 of Mr Mason’s Proof of Evidence is intended to show theoretical visibility but appears unreliable showing no intervisibility with Uplands where there are clear views of rising land within the eastern field both from within the property and from the grounds. Similarly, paragraph 6.10.1 makes no reference to the residential property Uplands which would also experience major to moderate adverse effects.
40. In terms of visibility of the Site from the adjacent lanes which flank or pass through the Site, Mr Mason reiterates the findings of the LVIA that *‘views from nearby routes are typically intermittent and sequential, obtained through gaps in hedgerows, rather than being sustained or panoramic.’* Mr Mason goes on to describe the views being mitigated by proposed planting such that the clearest views would occur at field openings/access gaps and could be described as “glimpsed” (paragraph 6.12.4)

41. To assist the Inspector with understanding the nature of the views from the surrounding lanes, further analysis has been undertaken. This analysis demonstrates that there are a total of 16 open views across the western and eastern fields and that elsewhere the hedgerows are frequently permeable. Through a simple visual assessment, hedges have been classified by density and therefore extent of permeability to give an understanding of views into the Site. For example, a 25% hedge would give rise to a 75% permeable view. These are illustrated on the Map 1A below. Examples of the nature of these different permeable hedges are also provided.



Map 1A showing views and permeability of hedges.



Examples of 75% permeability



Example of 50% and 75% permeability respectively

42. This analysis demonstrates that the Site is very visible through existing permeable hedgerows for sustained lengths and that views from open gaps in hedgerows cannot be regarded as “glimpsed” or “oblique” as a result, and especially between October-April. Only in a relatively few locations are views into the Site screened by built form and vegetation. Mr Mason claims that the proposed mitigation would screen views in summer and filter them in winter and at paragraph 4.4.5 mitigation would provide an effective screen within approximately 5 years. However, the photomontages provided in Mr Mason’s appendices clearly show that even after 10 years elements of the proposed development would remain visible (e.g. Figure 11c). In more general terms, I find the images presented are dark. I have therefore lightened Figure 11c to more clearly show the extent to which panels would be visible even at year 10 (see below).



Figure 11c - Original image



Figure 11c - Lightened image

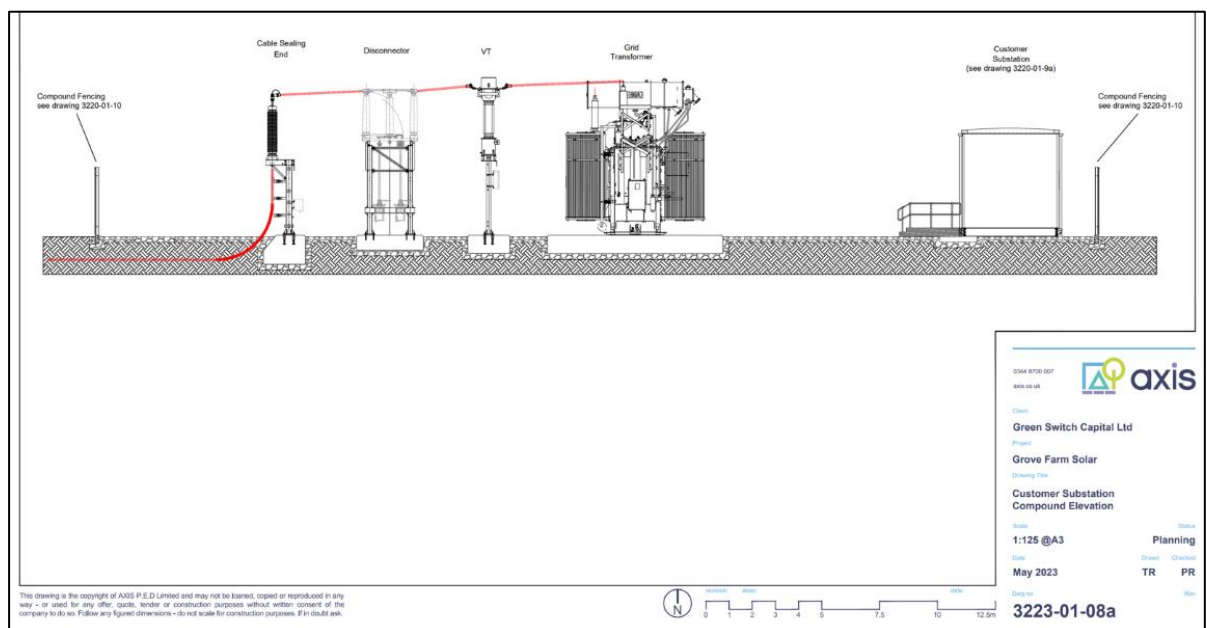
43. In the case of Figure 11b, I find the visual misleading. The image below shows the extent to which moving a short distance to the left would enable a clear view down the access track to the proposed substation. I also note in the montage provided at Mr Mason's Appendix 1, Figure 11b that the access track is not *'lined by a hedgerow in a manner characteristic of the area'* (CD A4 Appendix 5, page 5). The access track would not, in my view, be characteristic of the historic lanes.



Entrance to the eastern field. The substation will be located in direct alignment with the access road, c. 250m from the viewpoint. The Pallisade fencing surrounding the sub-station would be 3m high and utilitarian (see typical image below). The infrastructure it would enclose would be higher than the fencing (refer to drawing 3223-01-081 (replicated below). I note there is no mention of the substation in the eastern field in the assessment of Viewpoint 2 in the LVIA Appendix 5 pages 4-6 (CD A4).



Typical sub-station infrastructure surrounded by palisade fencing.



Replica of drawing 3223-01-081.

Other Observations

44. Mr Mason shows a lack of consistency when referencing the scale of fields comprising the Appeal Site. They are described in Paragraph 3.1.1 and 3.1.4 as 'open medium to large scale field pattern', in Appendix 1 under Landscape Quality they are described as

'large field units' and at 9.4.3 'exceptionally large field units', almost exaggerating their size to demonstrate the benefit of mitigation planting. The locally focused assessment of the Parish (CD G7) describes the enclosure pattern as '*medium scale arable fields defined by ancient woodlands and a network of historic lanes*' (page 32).