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11/01/2024

For the attention of: Bron Curtis

Ref: DC/23/05656; Land at Grove Farm and Land East of The Railway Line, Bentley

Thank you for consulting us on the Full Planning Application - Construction of Photovoltaic Solar Array, Ancillary Infrastructure, DNO Substation, Customer Substation, Grid Connection and Landscaping.

This letter sets out our application response regarding the landscape matters and how the proposal relates and responds to the landscape setting and context.

Site context
The site is located to the north of Potash Lane, approximately 700m to the north of Bentley. To the north-west is the Ancient Woodland Engry Wood. There is a bridleway along the western boundary, but this appears to be running through existing a mature vegetated corridor. Vegetation is present to the south, east and northern boundaries, although there are gaps to which the site is part visible. The site is currently managed as arable land and landform/topography appears to be relatively flat.

The Suffolk Coast and Heath Area National Landscape is approximately 1.3km to the south, and 2.5km to the north-east. Thus, the likelihood of an adverse impact on the setting of the National Landscape needs to be considered.

A Grade II* Listed Building Church of St Mary is located to the north-east of the site. The proposal is likely to have an impact on the setting of the listed building.

The site is covered by two County level landscape character types (Suffolk Landscape Character Assessment), Ancient Estate Claylands (west half of the main arable field) and Ancient Estate Farmlands (east part).

The key characteristics of the Ancient Estate Farmland LCT can be reflected on the site and its surrounding:

- Large-scale arable blocks divided into rectilinear fields
- Substantial number of ancient woodlands
- Nucleated villages, but with some dispersed farmsteads and clusters of houses

The key characteristics of the Ancient Estate Claylands LCT is:

- Straight boundaries where influence of privately owned estates is strongest
- Ancient semi-natural woodland
- Villages with dispersed hamlets and farmsteads

Common guidance for both LCTs below:

- Maintain and increase the stock of hedgerow trees
- Restore and enhance the condition of ancient woodlands with effective management including the effective control of deer grazing and browsing.
- Restore the quality of elm hedges with coppice management.
- Maintain, enhance and restore locally distinctive holly hedges.

Review of the proposal

We provided comments at pre-application stage and gave general recommendations to minimise visual and landscape impact effects, maximise biodiversity and green infrastructure enhancements.

Drawings have been submitted as part of this planning application to include more detail on the proposed layout for the solar development, proposed landscape and associated infrastructure.

LVIA

The submitted LVIA has been prepared following the principles set out in the third edition of "Guidelines for Landscape and Visual Impact Assessment" (GLVIA3).

We have found a discrepancy in the LVIA report: Figure 7 of the LVIA shows the west part of the site as Wooded Estate Claylands. The Suffolk Landscape Character Assessment identifies this area as Ancient Estate Claylands.

There are localised views into the site through gaps in the vegetation at specific locations along the bridleway and road network. The LVIA recognises the visual and landscape changes and effects as a result of the proposed development. Some of the landscape character on these views will change permanently, such as Viewpoint 4 where the view exhibits characteristics of the LCT with a reduced glimpse of St Mary's Church tower in the background. As a result of the proposed mitigation planting, the character of this view will be lost.

We welcome the type 4 visualisations at year 1 and year 10. It demonstrates how the proposed landscaping is able to mitigate the adverse visual effect of the proposed development. It would have been beneficial to have type 4 visualisations for viewpoints 5 and 6 (views from the bridleway). We understand that the solar development will sit back quite a distance, as a portion of the site will be kept for agricultural use. We can interpret that there will be a degree of change in the view, but this will not be as dramatic as other views but what is not clear is the degree of loss of view (even though existing views are reduced by existing mature vegetation) of St Mary's Church tower.

Landscape proposal

At pre -application stage we raised concerns on the following:

- *The change in use could have an impact on the setting of Church St Mary.*

  We noted that a new buffer area has been introduced and solar development moved south away from northern boundary to retain open aspect from views from Church Lane. We understand that this also has the purpose of retaining the landscape character to the setting of important buildings to the north.

- *We have concerns over the woodland planting buffer proposed to the properties to the south of the site*.

  This woodland planting buffer has been removed and the landscape proposals drawing 3223-01-13 now shows a series of small field parcels divided with hedgerows and hedgerows trees. Some of these following historical field pattern. We consider this a positive change.

- *It is important that sufficient standoff buffer areas are proposed between the existing site boundaries and the proposed solar array development.*

The Arboricultural Impact Assessment confirms the retention and protection of all of the existing vegetation, apart from some necessary removals to accommodate access tracks. Solar parcels and access tracks have been plotted consider root protection areas of existing vegetation. Buffer area has been introduced between Engry Wood Ancient Woodland and solar development.

The proposed planting for the DNO substation (to the east of railway line) as currently shown on the plans raises concerns on impact to landscape character as the need to screen this area creates an incongruent landscape feature, and it is considered that will be out of place following decommissioning of the solar development. We would request that this area is review and a long-term planting design solution that better responds to the existing landscape fabric and character is proposed instead.

We appreciate that the proposed field pattern with hedgerows and hedgerow trees has been designed responding to the historic field pattern. The spacing and rhythm of the hedgerow trees needs to be consider carefully to avoid regular spacing and to reflect the landscape character. We acknowledge that the landscape proposal is not at detail stage, but we would like to make the following comments:

- As demonstrated in Viewpoint 3 visualisation, the spacing of new hedgerow trees will be critical in keeping with landscape character. The current representation for year 10 shows an almost regular tree arrangement and we request that this is amended. As a general guide Suffolk Wildlife Trust recommends hedgerow trees at 15—30m intervals but ques from the existing landscape should be used as well.

- The small fields pattern characteristic of the Ancient Estate Claylands LCT have fewer hedgerow trees. This and other characteristics of both LCTs should be reflected in the detail landscape scheme.

- New hedgerow has been proposed to screen views into the solar development from Church Road at the new access tracks. Whilst this is effective and deals with the visual effects, we have concerns that long-term (post-decommissioning) views into the open arable fields will be lost. To reinstate some of the characteristics of the former landscape, the section of hedgerows could be translocated elsewhere to the established field boundaries within the site.

The omission of the most productive agricultural land areas of the site for solar development is a positive element of the proposal.

<u>Associated infrastructure</u>
Generally, any buildings (transformer station unit, control building, spares container, substations and other units) should be of a sensitive colour to blend in with the surrounding landscape. The use of colour green will not be acceptable and instead the use of the colour black, dark grey or dark brown will be more suitable. This also applies to CCTV posts and any other lighting posts.

The proposed traditional stockproof fencing (or deer fencing) of timber posts and wire mesh as the perimeter fencing for the solar parcels is appropriate for this site. As above, avoid colour green for the wire mesh.

We note the proposed palisade type fencing to the substation areas. A more sensitive fencing alternative should be consider. For example, a welded mesh fence will be more appropriate. As above, avoid colour green.

Summary
We acknowledge that the site is not visible in its entirety as one entity given the existing vegetated boundaries and generally flat topography, however, localised views are available through gaps in vegetation. The available views into the site will experience a degree of permanent change as a result of new field boundaries but a degree of openness will be retained. However, users of the bridleway will experience a significant change in experience of the views at one particular location with

permanent character change. This also applies to views to the east and west from Church Road (Viewpoint 2).

Generally, we consider that the site has the capacity to assimilate the proposed development subject to the delivery of its key principles and our recommendations below embedded into the detail design stages;

- The landscaping around the DNO substation needs to be reviewed and a long-term planting design solution that better responds to the existing landscape fabric and character is proposed instead.

- The spacing and rhythm of new hedgerow trees needs to be consider carefully to avoid regular spacing and to reflect the landscape character.

- To reinstate the characteristics of the former landscape at post-decommissioning, the short sections of hedgerow at access points to limit glimpsed views into the site from Church Lane could be translocated elsewhere to the established field boundaries within the site.

- Generally, any buildings (transformer station unit, control building, spares container, substations and other units) should be of a sensitive colour to blend in with the surrounding landscape.

- A more sensitive fencing alternative to palisade fencing should be consider. For example, a welded mesh fence will be more appropriate

Recommended conditions
If the application is minded for approval, we would recommend that the following conditions are apposed:

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: HARD AND SOFT LANDSCAPING SCHEME.

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a scheme of hard and soft landscaping and boundary treatment for the site, which shall include any proposed changes in ground levels and also accurately identify spread, girth and species of all existing trees, shrubs and hedgerows on the site and indicate any to be retained, together with measures for their protection which shall comply with the recommendations set out in the British Standards Institute publication BS 5837:2012 Trees in relation to design, demolition and construction. The soft landscaping plan should include plant species, number, location and sizes of the proposed planting. The plans should clearly show the position of new fencing in relation to existing and proposed planting.

Reason: In the interests of visual amenity and the character and appearance of the area. This condition is required to be agreed prior to the commencement of any development to ensure matters of tree and hedgerow protection are secured early to ensure avoidance of damage or lost due to the development and/or its construction. If agreement was sought at any later stage, there is an unacceptable risk of lost and damage to important trees and hedgerow that would result in harm to amenity.

ACTION REQUIRED PRIOR TO COMMENCEMENT OF DEVELOPMENT: LANDSCAPE MANAGEMENT PLAN (LMP)

No development shall take place until there has been submitted to and approved, in writing, by the Local Planning Authority a landscape management plan for a minimum of 5 years. This should include:

a) Drawings showing:

- The extent of the LMP, i.e., only showing the areas to which the LMP applies.

b) Written Specification detailing, where relevant:

- All operation and procedures for soft landscape areas; inspection, watering, pruning, cutting, mowing, clearance and removal of arisings and litter, removal of temporary items (fencing, guards and stakes) and replacement of failed planting.
- All operations and procedures for hard landscape areas; inspection, sweeping, clearing of accumulated vegetative material and litter, maintaining edges, and painted or finished surfaces.
- Furniture (Bins, Benches and Signage) and Play Equipment.
- All operations and procedures for surface water drainage system; inspection of linear drains and swales, removal of unwanted vegetative material and litter.

c) Maintenance task table which explains the maintenance duties across the site in both chronological and systematic order.

Reason – To support plant establishment and ensure appropriate management is carried out and to maintain functionality and visual aesthetic.

If you have any queries regarding the information stated above, please do not hesitate to contact us.

Yours sincerely,

Almudena Quiralte BA (Hons) Dip LA CMLI
Senior Landscape Architect Consultant

Place Services provide landscape advice on behalf of Babergh and Mid Suffolk District Councils.
Please note: this letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.