

## ***Landscape Briefing Note 1: Grove Farm, Bentley***

*Project:* 1296 Grove Farm, Bentley

*Date:* 30<sup>th</sup> August 2024

*Purpose:* Review of application DC/23/05656

*Reference:* 1296 BN01 Grove Farm, Bentley Final.docx

*Author:* Michelle Bolger FLI

### **Introduction**

1. Michelle Bolger Expert Landscape Consultancy (MBELC) has been instructed by Babergh District Council (BDC) to review the landscape and visual impacts of a full application for Construction of a solar farm (up to 40MW export capacity) with ancillary infrastructure and cabling, DNO substation, customer substation and construction of new and altered vehicular accesses. (Ref: DC/23/05656).
2. A Landscape and Visual Impact Assessment (LVIA) prepared by Axis, dated June 2023 accompanied the application. The LVIA included four visualisations and photographs from eight further viewpoints. Additional Landscape Information (Additional Information) was included in a letter from Axis to BDC dated 9<sup>th</sup> July 2024 in response to comments from consultees.
3. Consultation Responses that have been reviewed include:
  - Landscape Response from Place Services as commissioned by BDC dated 11/01/24;
  - Landscape Response from Bentley Parish Council prepared by Alison Farmer Associates (AFA) dated January 2024.
4. This review has been undertaken in accordance with the principles set out in the *Guidelines for Landscape and Visual Impact Assessment*, Third Edition 2013 (GLVIA3) prepared by the Landscape Institute/Institute of Environmental Management and Assessment. A visit to the area was undertaken by MBELC in July 2024. The assessment of landscape value has been undertaken in line with the Landscape Institute on Technical Guidance Note Assessing landscape value outside national designations (TGN 02/21).

---

5. The LVIA sets out landscape character types (LCT) that are present in the landscape in which the site is located. These are also discussed in the Response from the Consultant from Place Services who reviewed the application on behalf of BDC. I do not review them again in this Briefing Note as I have concluded that the key issues regarding this site are not in relation to LCTs.
6. Neither the authors of the LVIA nor the Consultant from Place Services identified that the site was located with the Suffolk Coast & Heaths National Landscape<sup>1</sup> (NL) Additional Project Area. In addition, neither the authors of the LVIA nor the Consultant from Place Services made any reference to the most recent study undertaken to assess the landscape value of the Additional Project Area; *Valued Landscape Assessment Suffolk Coast & Heaths Additional Project Area Report* prepared by Alison Farmer Associates (AFA) (2020).
7. I consider that the key landscape issue with regard to this application is whether the immediate landscape in which the site is located (which includes more than one LCT) is a valued landscape for the purposes of NPPF Paragraph 180a. Section 2 of this Review sets out the reasons why I have concluded that it is a valued landscape.
8. Having identified that the site lies within a valued landscape the second issue is to determine the degree of harm<sup>2</sup> to the Special Qualities /valued characteristics of the landscape that would result from the proposed development.
9. This review is structured as follows:
  - Valued Landscape
  - Effects of the Proposals on the Special Qualities of Site's immediate landscape
  - Submitted LVIA
  - Conclusions

---

<sup>1</sup> Previously known as the Suffolk Coast & Heaths Area of Outstanding Natural Beauty. For consistency, the term National Landscape has been used in this review except when quoting from existing documents.

<sup>2</sup> The LVIA acknowledges the proposed development would result in landscape harm. The issue is the level of that harm.

---

## Valued Landscape

10. Several landscape assessments, in addition to the published country and district landscape assessment, have been undertaken for the area that includes the site. This is primarily because the site:
  - Is within an area previously designated as a Special Landscape Area (SLA);
  - Is within the Suffolk Coast & Heaths National Landscape<sup>3</sup> (SCH NL) Additional Project Area (APA).
11. The Assessments that have been undertaken are:
  - *Natural Beauty Assessment, Suffolk Coast and Heaths Area of Outstanding Natural Beauty Boundary Variation Project* (2017) Natural England;
  - *Valued Landscape Assessment Suffolk Coast & Heaths Additional Project Area Report* prepared by AFA, (2020);
  - *A Landscape Appraisal* of Bentley Parish prepared by AFA for the Bentley Neighbourhood Plan (2019); and
  - *The Shotley Peninsula and Hinterland Landscape Character Assessment* prepared by AFA for the Stour and Orwell Society and Suffolk Coast and Heaths Area of Outstanding Natural Beauty Partnership, (2012/13).<sup>4</sup>
12. Within the **2017 Natural Beauty Assessment** the site is in Area D3: Shotley Peninsula Plateau. The Natural Beauty Assessment did not recommend that Area D3 should be included in the Suffolk Coast & Heaths NL because it has '*a mixed weight of evidence of natural beauty*'<sup>5</sup> . It goes on to say that '*some areas have higher levels of natural beauty, these are small and fragmented and the majority of the area has a lower weight of Evaluation of Natural Beauty in relation to a proposed Boundary Variation to the Suffolk Coast and Heaths AONB.*'<sup>6</sup> The Natural Beauty Assessment explicitly states that one of the areas that has a higher level of natural beauty is '*the area around Bentley Park, Bentley Hall and Bentley Manor where historic landscape patterns remain relatively intact.*'<sup>7</sup>

---

<sup>3</sup> Previously known as the Suffolk Coast & Heaths Area of Outstanding Natural Beauty. For consistency, the term National Landscape has been used in this review except when quoting from existing documents.

<sup>4</sup> Although noted here for completeness this Assessment is not considered further because I consider its findings have been incorporated in the more recent studies.

<sup>5</sup> Natural Beauty Assessment Page 73

<sup>6</sup> Natural Beauty Assessment Page 73/74

<sup>7</sup> Natural Beauty Assessment Page 74

---

13. The purpose of the *Valued Landscape Assessment Suffolk Coast & Heaths APA* was not to identify **areas** of valued landscape but to '*articulate valued aspects of the landscape within the Project Area.*'<sup>8</sup> In order to (inter alia) '*better protect Project Areas against inappropriate development.*'<sup>9</sup> Within the Valued Landscape Assessment, the site is in Broad Assessment Area 1 Western Wooded Plateau. This area includes all of Bentley Parish and land to the north around Belstead.
14. A detailed assessment of the area is provided on pages 16 and 17 of the study from which the following special qualities are drawn:
  - '*Hall/church complexes along with ancient woodland and rural lanes reflect patterns of the medieval landscape.*
  - '*Remnant areas of parkland and notable veteran trees throughout area impart an established character.*
  - '*Sinuous lanes and patterns created by wavy edges to ancient woodland, rural winding lanes and old park boundaries and enclosure patterns.*
  - '*Wooded skylines defined by ancient woodlands and highly valued for biodiversity.*
  - '*Attractive open views across rural farmland to individual or clusters of vernacular buildings.*'<sup>10</sup>
15. The landscape in which the site is located includes all the above special qualities, but the site has also been subject to post-1950s field boundary loss.
16. This assessment, along with all the other assessments, highlights the particular landscape value of the area around Bentley Park, Bentley Hall and Bentley Church (the Church/Hall complex). The landscape and historic value of this area is not disputed by the applicant.
17. The *Landscape Appraisal of Bentley Parish* includes a Valued Landscape Assessment<sup>11</sup> that concludes that '*the northern part of the Parish has a weight of evidence to support its recognition as a valued landscape due to its intact historic patterns of settlement, ancient woodland, remnant parkland and rural lanes.*'

---

<sup>8</sup> Valued Landscape Assessment Suffolk Coast & Heaths APA Page 1 Paragraph 1.2

<sup>9</sup> Valued Landscape Assessment Suffolk Coast & Heaths APA Page 1 Paragraph 1.2

<sup>10</sup> Valued Landscape Assessment Suffolk Coast & Heaths APA Page 18

<sup>11</sup> This was undertaken prior to the most recently guidance from the Landscape Institute on *Assessing landscape value outside national designations* Technical Guidance Note (TGN 02/21) however the follows the same principles and is it is based on GLVIA3 Box 5.1 which is the starting point for TGN 02/21.

---

18. The northern part of the parish is not defined on a plan, but it clearly includes all the land to the north and north west of the site as this area includes several of the features identified as having especial value (E.g. Bentley Hall, Bentley Church, and areas of ancient woodland). However, other features of value extend south from this area, such as the '*Intact pattern of historic winding narrow, and occasionally incised, lanes such as Church Road.*' Potash Lane which lies along the southern boundary of the site is also an historic winding lane. Pond Hall Lane, now a bridleway, lies to the west of the site is another sinuous route.
19. Historic field boundaries within the site have been lost, particularly to the west of Church Road and this has resulted in a more utilitarian agricultural character. However, this boundary loss has not introduced any incongruous features, and the surrounding historic winding lanes and the PRoW network have been retained. The pattern of dispersed development along Potash Lane and Church Lane, with farmhouses and groups of vernacular farm buildings, is still very evident and has not been lost to 20<sup>th</sup> Century infill as has happened along Station Road in the southern part of the parish. I consider that the valued '*northern part of the Parish*' extends to Potash Lane and includes the lane itself.
20. Appendix 1 includes my valued landscape assessment undertaken in line with TGN 2/21. In addition to the factors identified in the published assessments and my assessment, the location of the site within the Suffolk Coast and Heaths NL Additional Project Area adds further weight to the identification of the landscape immediately surrounding the site as a valued landscape. This is found in the Suffolk Coast and Heaths NL Management Plan 2023-28 and in the Babergh Joint Local Plan Part 1 November 2023.
21. The Additional Project Areas are described in the Suffolk Coast and Heaths NL Management Plan 2023-28 as follows:

*'There are areas adjacent to the AONB that are considered important for the context of the nationally designated landscape. These areas are valued landscapes as defined by the National Planning Policy Framework and are an important part of the setting of the AONB. The Shotley Peninsula, along with other areas, have been subject to a Landscape Character Assessment that identifies the links to the current AONB and the importance of a co-ordinated land management approach.'*<sup>12</sup> (Emphasis added)

---

<sup>12</sup> Suffolk Coast and Heaths NL Management Plan 2023-28 Page 18

---

22. The Additional Project Areas are identified in the Babergh Joint Local Plan Part 1 November 2023 as needing particular consideration with reference to Policy LP18 - Area of Outstanding Natural Beauty. The supporting text for the policy reads as follows:

*'15.23 Babergh and Mid Suffolk have a diverse landscape character, with parts of Babergh lying within Dedham Vale AONB and the Suffolk Coast and Heaths AONB. Adjoining the Dedham Vale AONB is an area defined as the Stour Valley Project extending beyond Sudbury and into West Suffolk. The Suffolk Coast and Heaths AONB also has a project area which encompasses the Shotley Peninsula. Whilst these project areas do not benefit from the same protection as the AONBs, development proposals in these areas should conserve their special qualities as identified in the Valued Landscape Assessments, and where relevant seek to deliver enhancements where the special qualities have been impacted by changes in farming practices or previous development.'* (Emphasis added)

23. The Valued Landscape Assessment referred to in this policy is the study referenced in Paragraph 13 above and the special qualities are those quoted in that paragraph.

24. Given the evidence set out above I conclude that the site is within a valued landscape for the purposes of the NPPF paragraph 180a.

#### **Effects of the Proposals on the Special Qualities of Site's immediate landscape**

25. The Church/Hall complex which it is agreed has evident historic integrity, lies immediately to the north of the site. The proposed development would fill the arable fields that lies immediately to the south The Church/Hall complex, either side of Church Road. The loss of historic field boundaries in these arable fields means that the historic integrity of these fields is reduced compared to the landscape immediately to north and west. However, there are currently no noticeable detractors within these fields and their undeveloped character is supportive of the area of high historic integrity. The introduction of the solar farm would introduce a noticeable detractor immediately adjacent to the area of high historic integrity which would significantly disrupt the transition from that area to the wider, less intact landscape to the south. The current gentle transition would become abrupt and jarring.

26. The character of Church Road, one of the historic, sinuous rural lanes, would be especially harmed. There would be vehicular access from Church Road into the eastern side of the site and vehicular access out of the western side of the site onto Church Road. Both accesses will be out of character with the road and will allow views into both the western and eastern parts of the site, even when planting has established. The visualisation from Vp 2 shows views into the eastern part of the site. There will be similar views from this

---

location into the western part of the site as well. There will be intermittent views of the solar panels from the rest of Church Road through gaps in the existing hedge. In time these views of the panels will be screened in summer, but they are likely to be evident in winter and the existing rural and undeveloped character of the road will be diminished.

27. There will be views of the development from Potash Lane, another historic rural lane. These will include views from the main vehicular access into the western half of the site, and from the bridleway, also known as Pond Hall Lane, one of the fossilised historic routes (LVIA Vp 6).

28. The development will be close to the edge of Engry Wood Ancient Woodland. A buffer has been left with regard to the root protection area, but the agricultural setting of the wood will be harmed.

29. New hedgerows are proposed. Whilst some sections reflect historic alignments others do not and many of the historic hedgerows will not be replanted. The historic field pattern will not be restored instead, an entirely new field pattern would be created which responds to the solar farm use of the site, not historic uses.

#### **Submitted LVIA and Additional Information**

30. I disagree with the conclusions of the submitted LVIA which failed to identify that the site was part of the Suffolk Coast and Heaths NL Additional Project Area and did not reference the recent value assessment that has been undertaken for the area.

31. The applicant is understandably upset that the location of the site within the Additional Project Area was not raised at the pre-application stage (Page 6 of Additional Information). The Additional Information points out that the Consultant from Place Services who reviewed the application on behalf of BDC did not raise the issue of the Additional Project Area. I consider that the fact that the Consultant from Place Services had not identified that the site was located within the Additional Project Area is likely to have affected the judgments reached in that consultation response.

32. The Additional Information attempts to address this omission in the LVIA and includes a consideration of the Special Qualities for Assessment Area 1 Wooded Plateau as identified in the *Valued Landscape Assessment*. The Additional Information acknowledges that the Special Qualities are particularly well expressed around Bentley Hall and Church and then states that '*The Site itself is formed of medium/large arable fields and therefore does not directly exhibit the characteristics of the hall/church complex. The reduction in hedgerow cover has also reduced the characteristics of the medieval landscape at the Site.*'

---

33. The characteristics of the medieval landscape are reduced within the site, but they are not absent, for example the sinuous historic Church Road runs through the middle of the site and Engry Wood forms one of the boundaries. In addition, TGN 2/21 makes clear 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/ 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.'* This is particularly relevant regarding this site because of the role that its undeveloped character plays in supporting the more intact historic landscape which lies to the north and west.

34. I do not agree with the conclusion of the Additional Information that the *'previous omission does not affect the overall conclusion of the LVIA that the Proposed Development can be successfully implemented on the Site without unacceptable landscape and visual effects.'* I consider that the failure to identify that this landscape has been recognised as of value, through the Joint Local Plan Part1 and the AONB Management Plan, has affected the judgements within the LVIA. This relates to both judgments regarding the value of the existing landscape and judgments regarding the landscape harm from the development. The LVIA does not include a landscape value assessment in accordance with TGN 2/21.

35. Appendix 2 has been prepared to supplement Table 2 from the LVIA page 47, with the individual judgments that are found within the text of the LVIA. Although the Additional Information says, *'the overall sensitivity of the Site would remain between medium-high and high as reported in the LVIA.'* I have not been able to find this conclusion in the LVIA. However, it is significant that the Additional Information considers that the LVIA concluded that the site had *medium/high to high sensitivity* to the proposed development even without being aware that the site was part of the Suffolk Coast and Heaths NL Additional Project Area.

36. I consider that the site and the immediate landscape has **high value** and **medium/high susceptibility** to the proposed development. I consider the sensitivity to be **medium/high** and the **magnitude of change to be medium**. The overall effect on the character of the site and its immediate landscape would be **moderate/major adverse**. Unlike the LVIA I do not consider that there would be a significant reduction in landscape effects once the mitigation planting has established because the harm to the special qualities outlined above would remain. There would be some reduction in visual effects as some views of the development would be screened during the summer months.



---

## Summary and Conclusions

37. I have reviewed the information provided by the applicant with regard to the application for a solar farm (up to 40MW export capacity) with ancillary infrastructure. I have also reviewed several studies that have
  - considered the landscape in which the site is located,
  - considered whether it is a valued landscape, and
  - identified the special landscape qualities that it possesses.
38. I agree with the conclusions of those studies that the site is located within a valued landscape.
39. Although there has been some boundary loss within the site which means that it does not have the degree of historic integrity that is present immediately to the north and west of, it does contain features of value, such as the narrow sinuous Church Road, and it provides a supportive, underdeveloped transition between the most historically intact landscape areas around the Church/Hall complex and the more developed areas in the south of Bentley Parish. The site has an important role to play in its landscape context.
40. The development could not be accommodated in this landscape without significant harm to the character and appearance of a valued landscape. The development would introduce a noticeable detractor which would significantly disrupt the transition from the area of intact historic landscape to the wider, less intact landscape. The current gentle transition would become abrupt and jarring. In addition, the character of Church Road, one of the historic, sinuous rural lanes, would be harmed.



---

## Appendix 1: Landscape Value Assessment

The table below assesses the site against the range of factors that should be considered when identifying landscape value outside of national designations.<sup>13</sup>

**Table 1 - Landscape Value Assessment**

Factor	Definition	Landscape Qualities	Value
<b>Natural heritage</b>	Landscape with clear evidence of ecological, geological, geomorphological or physiographic interest which contribute positively to the landscape.	The presence of ancient woodlands, hedgerows with mature hedgerow trees, including veteran trees, indicate clear ecological interest which contributes positively to character and appearance of the landscape. The arable fields have less ecological value.	<b>High/medium</b>
<b>Cultural heritage</b>	Landscape with clear evidence of archaeological, historical or cultural interest which contribute positively to the landscape.	The Church/Hall complex, the distribution of woodland, the still discernible dispersed settlement pattern, and vernacular farm complexes indicated significant cultural heritage interest. These landscape features are knitted together by the sinuous rural lanes, and the fossilised pattern of historic routes that can be found in the PRoW network.	<b>High</b>
<b>Landscape condition</b>	Landscape which is in a good physical state both with regard to individual elements and overall landscape structure.	The landscape is in good condition and the historic pattern is still evident. There is field boundary loss, e.g. within the site.	<b>High/medium</b>
<b>Associations</b>	Landscape which is connected with notable people, events & the arts.	Bentley was the original home of the Tollemache family. I understand that the woodland in this area are associated with Oliver Rachkam one of the first historical woodland ecologists.	<b>Not scored</b>

---

<sup>13</sup> Landscape Institute Technical Guidance Note (TGN) 02/21 Assessing landscape value outside national designations,

Factor	Definition	Landscape Qualities	Value
<b>Distinctive - ness</b>	Landscape that has a strong sense of identity.	The Bentley Church/Hall complex is distinctive. The wooded arable landscape is typical of plateau farmland in Suffolk.	<b>High/ medium</b>
<b>Recreational</b>	Landscape offering recreational opportunities where experience of landscape is important.	Dense network of PRoW which connect the different parts of the Parish and link to the wider countryside. Their character is enhanced due to their historic origins.	<b>High</b>
<b>Perceptual (Scenic)</b>	Landscape that appeals to the senses, primarily the visual sense.	An attractive landscape with few detractors. Principally the line of pylons that lies to the east of the railway which itself is mostly in cutting and not intrusive.	<b>High/ medium</b>
<b>Perceptual (Wildness &amp; tranquillity)</b>	Landscape with a strong perceptual value notably wildness, tranquillity and/or dark skies.	Not a wild landscape but with a strong sense of tranquillity despite some noise from the A12	<b>High/ medium</b>
<b>Functional</b>	Landscape which performs a clearly identifiable and valuable function, particularly in the healthy functioning of the landscape.	The presence of ancient woodland along with historic hedges and veteran trees all contribute to the healthily functioning of the landscape. Identified in the Suffolk Coast and Heaths Management Plan as an important part of the setting of the NL with links to the NL.	<b>Medium</b>

---

## Appendix 2: Summary of LVIA conclusions on Landscape Effects

**Table 2: Summary of LVIA Landscape Effects:**

Landscape value and susceptibility which are shown in red, have been added from Chapter 6.3 Operational Phase: Landscape.

Receptor	Value	Susceptibility	Sensitivity	Short-term impact	Short-term effect	Long-term impact	Long-term effect
<b>Landscape Effects - Operational Phase - Main Site</b>							
<b>The Main Site</b>							
Landscape Fabric (farmland)	Low	Low	Low	Medium to High	Minor adverse	Medium to High	Minor adverse
Landscape Fabric (hedgerows)	Medium	Medium	Medium	Small	Negligible to Minor adverse	High	Moderate to Major beneficial
Landscape Fabric (hedgerow trees)	High	High	High	Neutral	No change	Medium	Moderate to Major beneficial
Landscape Fabric (landform)	Low to medium	Low	Low to Medium	Small to Neutral	Negligible adverse	Small to Neutral	Negligible adverse
Overall Assessment for the Main Site			Medium-High <sup>1</sup>				
<b>Wider Landscape - Study Area<sup>2</sup></b>							
Ancient Estate Claylands LCA 1	Medium to High <sup>3</sup>	Medium <sup>3</sup>	Medium	Medium	Moderate adverse	Small	Minor adverse
Ancient Estate Farmlands LCA 2	Medium to High <sup>3</sup>	Medium to High <sup>3</sup>	Medium to High	Medium	Major to Moderate adverse	Small	Moderate to Minor adverse

Receptor	Value	Susceptibility	Sensitivity	Short-term impact	Short-term effect	Long-term impact	Long-term effect
<b>Landscape Effects - Operational Phase - Substation Site</b>							
<b>The Substation Site</b>							
Landscape Fabric (farmland)	Low	Low	Low	Negligible	Negligible adverse	Negligible	Negligible adverse
Landscape Fabric (woodland edge mosaic)	High	High	High	Medium to High	Moderate to Major adverse	Medium	Moderate adverse
Landscape Fabric (landform)	Medium to high	'it is susceptible to change'	Medium to High	Medium to Small	Moderate to Minor adverse	Medium to Small	Moderate to Minor adverse
Overall Assessment for the Substation Site	Not Assessed						
Rolling Valley Farmlands LCA 18	Medium to High <sup>3</sup>	High <sup>3</sup>	High	Small	Moderate adverse	Small to Negligible	Minor to Negligible adverse

<sup>1</sup> LVIA Paragraph 6.3.6

<sup>2</sup> LVIA Paragraph 6.4.1

<sup>3</sup> LVIA Appendix 4: Landscape Effects