



## **Grove Farm Solar, Bentley**

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

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

**LPA Ref: DC/23/056656**

## **SUMMARY Proof of Evidence Landscape and Visual Matters**

On Behalf of the Applicant



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# Document Control

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## 1.0 INTRODUCTION AND SCOPE OF EVIDENCE

### 1.1 Qualifications and Relevant Experience

- 1.1.1 I am Jon Mason, a Director of Axis, a multi-disciplinary planning, environmental and landscape consultancy.
- 1.1.2 I am a Chartered Member of the Landscape Institute and hold a BSC honours degree in Landscape Design and Plant Science from the University of Sheffield as well as a Diploma in Landscape Architecture also from the University of Sheffield. I lead a team of experienced landscape architects acting on a wide range of primarily infrastructure projects throughout the UK.
- 1.1.3 I have been employed by AXIS since 2001 and have over thirty years of professional experience. I have extensive experience of assessment of major infrastructure projects across the UK.
- 1.1.4 A senior Axis colleague within my team produced the Landscape and Visual Impact Assessment (LVIA) which accompanied the original planning application. I have subsequently become involved following the refusal of the planning application.
- 1.1.5 I am familiar with the appeal site (the Site) and the immediate surrounding area having made a site visit on Thursday 10th April 2025.
- 1.1.6 The evidence which I have prepared and provide for this call-in inquiry in this proof of evidence is true and I confirm that the opinions expressed are my true and professional opinions. My professional fees in respect of this project do not depend upon the outcome of this inquiry.

### 1.2 Scope of Evidence

- 1.2.1 This Proof of Evidence (PoE) addresses matters relating to landscape character and visual amenity.
- 1.2.2 The planning application was refused on 6 February 2025 for two reasons, one relating to heritage and one relating to landscape. This Proof addresses the landscape reason for refusal, which is worded as follows:

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

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

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

### **1.3 Proof of Evidence Structure**

- 1.3.1 My main proof of evidence is divided into a number of sections which cover the following:
- a) Section 2 describes the Site context and the Proposed Development (including the split between the Main Site and Substation Site and the basic elements of the solar farm).
  - b) Section 3 summarises the baseline landscape context (surrounding landscape, relevant character framework, and the designation context including the National Landscape and the APA).
  - c) Section 4 explains the landscape-led design approach and embedded mitigation, including buffers, retention of boundary vegetation, and the rationale for hedgerow reinstatement aligned to historic field patterns.
  - d) Section 5 sets out proposed post-determination amendments (additional woodland belts, screening adjustments, and minor layout refinements).
  - e) Section 6 reports the LVIA findings (study area and ZTV basis, receptor and viewpoint approach, predicted construction and operational effects, and how effects reduce over time as mitigation establishes).
  - f) Section 7 addresses the origins and evidential status of the Additional Project Area (APA), and why (in my view) it does not demonstrate “valued landscape” status.
  - g) Section 8 sets out my “valued landscapes” review, using GLVIA3 Box 5.1 and TGN 02/21 value factors to test whether the relevant landscape unit

is demonstrably beyond the ordinary, and compares this with the AFA and MBELC exercises.

- h) Section 9 then considers the “even if valued” position: identifying the claimed valued attributes and testing whether the proposals would materially harm them, having regard to mitigation, duration, reversibility, and the nature of solar development.
- i) Section 10 provides my summary and conclusions – repeated in full below.

## **2.0 SUMMARY AND CONCLUSIONS**

### **2.1 The key issues in this case**

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

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

### **2.2 Valued landscape status**

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

- 2.2.2 The Council and the Rule 6 Party identify positive characteristics within the wider area including ancient woodland, hedgerows with mature hedgerow trees, cultural heritage interest and associations, woodland distribution, a dispersed settlement pattern, vernacular farm complexes, sinuous rural lanes, a well-developed PRow network, and relatively limited modern development.
- 2.2.3 However, what is not explained is why this assemblage of components, many of which are neither unique nor unusual across large parts of rural England, should, in the round and at the relevant scale, elevate the landscape beyond the ordinary countryside baseline required by the Ouseley threshold.
- 2.2.4 My professional opinion is that the evidence relied upon does not set the receiving landscape around the Site apart from ordinary countryside in a way that would justify valued landscape status in Framework terms.

## **2.3 LVIA calibration and reliability**

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

## **2.4 Overall conclusions on landscape effects and scheme design**

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

- 2.4.2 The proposals include approximately 2.5 km of new hedgerows, around half of which would align directly with historic boundaries, with the balance designed to achieve the same objective of reinstating appropriately scaled fields and providing effective screening of the operational development. As a result, landscape and visual effects would be limited and localised and would reduce over time as planting matures. Change to the wider framework of elements that enclose and adjoin the Site, including boundary hedges, woodland blocks, historic lanes, and the principal cultural heritage assets relied upon by others, would be minimal, with those components remaining intact.
- 2.4.3 The description of the proposals as “industrial”, “incongruous”, “alien” and “jarring” in the reason for refusal is, in my opinion, misplaced. This form of development is low-height, modular and reversible and sits lightly in the landscape; it is not industrial activity or industrial built form. Large ground-mounted solar farms are, by their nature, predominantly a countryside form of development. In this case, the proposals can be effectively screened and would be capable of co-existing with neighbouring receptors with only limited adverse effects.

## **2.5 Even if valued**

- 2.5.1 Consequently, even if the Inspector were to accept the Council’s position that the landscape should be treated as valued, the evidence indicates that direct effects on the components said to contribute to value would be limited, localised and time-limited, and would reduce over time.
- 2.5.2 Moreover, the mitigation proposed would reinstate features that were present until the mid-twentieth century but subsequently lost, and whose loss has been detrimental to landscape structure, legibility and condition. Their reinstatement would therefore be restorative and beneficial, strengthening enclosure and improving the coherence of the immediate landscape.



## 2.6 Conclusion

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