

Proposed Solar Farm on Land East of Pelham Substation, Maggots End, Manuden

Application Ref: S62A/2022/0011

Representation on Landscape and Visual Effects

1 Introduction

1.1 Appointment

- 1.1.1 Alison Farmer Associates (AFA) was appointed by Stop Battles Solar Farm in March 2023 to undertake a review of the Landscape and Visual Impact Assessment (LVIA) of the above development, which is set out in Chapter 6 of the Environmental Statement (ES).
- 1.1.2 This review builds upon an earlier review, of a previous solar farm development on the same site which was submitted by Low Carbon as a full planning application UTT/21/3356/FUL to Uttlesford District Council in September 2021. This application was refused. A new application and revised LVIA was subsequently prepared (LVIA 2022) and submitted to The Planning Inspectorate on behalf of the Secretary of State under the provisions of Section 62A of the Town and Country Planning Act 1990. The Inspectorate requested an Environmental Statement be prepared and this was submitted February 2023.

1.2 Scope of work

- 1.2.1 This representation focuses on the landscape and visual impact of the proposed development as set out in Chapter 6 of the ES. It follows guidance published by the Landscape Institute in relation to reviewing landscape and visual impact assessments (LI Technical Guidance Note 1/20) and considers the assessment in terms of its compliance with best practice (GLVIA3)¹. It has been prepared by Alison Farmer (BA MLD MLI) a qualified landscape architect with over 30 years' experience in LVIA.
- 1.2.2 The review has included a desk-based review of associated drawings and plans as well as earlier impact assessments associated with previous proposals including:
- Landscape and Visual Impact Assessments 2021 and 2022
 - Ecological Impact Assessment (Clarkson and Woods)
 - Arboricultural Impact Assessment (Barton Hyett Associates)
- 1.2.3 The review has also involved two separate visits to the site and surrounding area.

¹ Guidelines for Landscape and Visual Impact Assessment, Landscape Institute/IEEMA, 2013.

2 Relevant Policy

2.1.1 The Overarching National Policy Statement for Energy (EN-1) and National Policy Statement for Renewable Energy Infrastructure (EN-3) form part of the relevant policy background. Draft EN-3 includes specific reference to solar photovoltaics noting that developments which cover significant areas. It states that with effective screening and appropriate land topography visual effects can be reduced to zero. It goes on to comment on the importance of good layout and design.

2.1.2 The National Planning Policy Framework sets out the need for planning policies and decision to conserve and enhance the natural environment by:

- a) Protecting and enhancing valued landscapes.....
- b) Recognising the intrinsic character and beauty of the countryside.....

2.1.3 Planning Policy Guidance notes specifically in relation to large-scale solar farms that they can:

'have a negative impact on the rural environment, particularly in undulating landscapes.....'

2.1.4 In terms of Local Plan policies, the Uttlesford Adopted Local Plan 2005 is the relevant document. Policies which are of particular relevance to this Solar Farm application include Policy GEN2 which states that:

'Development will not be permitted unless its design meets all the following criteria and has regard to adopted Supplementary Design Guidance and Supplementary Planning Documents.

- a) *It is compatible with the scale, form, layout, appearance and materials of surrounding buildings;*
- b) *It safeguards important environmental features in its setting, enabling their retention and helping to reduce the visual impact of new buildings or structures where appropriate;.....*
- h) *It minimises the environmental impact on neighbouring properties by appropriate mitigation measures;*

2.1.5 Policy S7 which relates to the countryside and states that:

'The countryside to which this policy applies is defined as all those parts of the Plan area beyond the Green Belt that are not within the settlement or other site boundaries. In the countryside, which will be protected for its own sake, planning permission will only be given for development that needs to take place there, or is appropriate to a rural area. Development will only be permitted if its appearance protects or enhances the particular character of the part of the countryside within which it is set or there are special reasons why the development in the form proposed needs to be there.'

2.1.6 While Policy ENV 15 – Renewable Energy states *'small scale renewable energy development schemes to meet local needs will be permitted if they do not adversely*

affect the character of sensitive landscapes, nature conservation interests or residential and recreational amenity’.

- 2.1.7 Finally, the supporting text for The Quality of the Countryside the Local Plan notes that:

‘Pastureland is not extensive but it does exist in the river valleys where drainage problems, in part, have resulted in Grade 3b designation. Although not the best and most versatile farmland, pasture land is important to the character and biodiversity of the district.’

[emphasis added]

3 Description of the Proposed Scheme

3.1 Components of Development

- 3.1.1 The site comprises 79.28 hectares in open countryside to the south of Berden and north of Maggots End Road. The site extends around the east, south and southwest of the hamlet of Brick House End. The east-west extent of the development is approximately 1.3km and the north-south extent is approximately 0.78km (excluding access roads). The development would sit on sloping land that forms the upper reaches of the Bourne Brook. This watercourse rises north of Pump Springs wood and flows south as a tributary to the River Stort.
- 3.1.2 The highest point of the site is c. 122m AOD in the northern-western extremity of the site and c. 118m AOD in the northern and eastern edges of the site. Topography slopes inward to around c. 102m AOD at the southern edge of the site where the access road is proposed. The slopes are most pronounced between Battles Wood and Brick House End (refer to Figure 1 of this report).
- 3.1.3 Para 6.3.6 of Chapter 6 divides the site into three parts west (Zone 5), central (Zones 6 and 1) and east (Zones 2, 3 and 4). Para 6.3.38 – 6.3.39 correctly identifies that the receiving landscape has limited visual connection to the wider environs due to landform and vegetation.
- 3.1.4 Para 6.3.10 describes the components of the proposed development. The development would include solar panels which would be static and up to 2.75m in height and would be arranged in an east-west orientation, (perpendicular to the contours), and spaced 4-6.5m apart. The development would also include:
- Substation (57.7m x 28.1m in extent) comprising components which are c.6m in height, customer switchgear and DNO Substation - shown on drawings SD-13 and SD-01
 - 40 battery units comprising containers c.3m high (airducts c. 3.9m high) and 12.2m long x 2.6m wide distributed around the site
 - 23 inverters comprising containers c.3m high and 12.2m long x 2.5m wide, distributed around the site
 - CCTV cameras mounted on 2.5m high poles around the perimeter of each zone and spaced c. 50m apart
 - 2m high security deer fencing around the perimeter of teach zone and 2.4m high palisade fencing around the substation
 - 3.5m wide access track comprising crushed aggregate providing access to each zone
 - Meadow seed mix would be sown around the perimeters of the site only
 - New hedgerow and tree planting is shown on drawing P20-1300-06
 - New woodland planting is also shown on drawing P20-1300-06 which comprises the bolstering of planting along Blaking's Lane and in the southern edge of Zone 4.
- 3.1.5 The proposed development is considered temporary but would last for 40 years, which is a considerable period of time. Give the issues surrounding climate change there is a strong probability that solar power will form an important part of the UK energy mix and therefore once permitted, development on this site, or a future

variation of it, may become a permanent feature of the landscape. The presumed 'temporary' nature of the development cannot therefore be taken as certain.

3.2 Mitigation

3.2.1 The LVIA states that *'the proposed layout incorporates a number of built in mitigation measures..... as part of the iterative design process'* and responds to the on-site analysis, preliminary LVIA work and discussion with Uttlesford District Council and pre app advice. The key mitigation is described at paras 6.3.15-6.3.26 and include:

- Reduction in the extent of development away from Maggot's End Road and Battle's Hall in order to address visual amenity issues from road users and footpath 7-39 and Battle's Hall
- Removal of development from the field southeast of Brick House End to reduce effects on footpath 5-15 and 5-14
- Planting which strengthens the existing landscape framework, visually enclosing development to reduce inter-visibility with very close receptors.
- Offsetting of panels from adjacent woodlands e.g. Battle's Wood.
- Further removal of panels to the north of the site following pre-app advice
- Further removal of panels to the south of the site following pre-app advice

3.2.2 Importantly these measures seek to reduce effects on certain receptors, e.g. users of Maggots End Road, Battles Farm, and public rights of way (Blaking's Lane and Footpath 14/5). However, the above measures do not address the effects on other lanes such as Brick House End Lane nor on the settlement of Brick House End.

3.2.3 Furthermore, the strengthening of the landscape framework and screening of the development does not take account of the difficulty of screening development on rising land nor of the likely landscape effects mitigation planting will have in terms of foreshortening views and altering perceptions of landscape character (see below).

3.2.4 The LVIA assumes growth rates of new planting to be 0.5m per annum (para 6.2.70). This growth rate is considered to be optimistic given the substantial deer population in the area. Proposed planting is outside of the site perimeter deer fencing and would require further fencing or tree guards to protect it. Double staggered rows for hedge planting and single lines of trees (as indicated on Figure 6.2) are unlikely to result in thick hedgerows within 5 years. Hedgerows would need to achieve sufficient lateral growth as well as height. Furthermore, the effectiveness of mitigation is reduced due to the sloping topography. Paragraph 6.3.17 states that hedgerows could be managed at 3m in height, however hedgerows on mid slopes would be sandwiched between solar panels which are themselves 2.75m in height or adjacent to inverters which are 3m in height (or 3.9m in height if they include air ducts), not to mention security fencing and CCTV poles (e.g. the proposed hedgerow between Zones 2 and Zones 3/4). They are therefore unlikely to form effective 'screens' to development. From many locations solar panels will remain visible extending across open slopes.

4 Understanding the Baseline

4.1 Landscape character

4.1.1 Chapter 6 makes reference to the Uttlesford Landscape Character Assessment (ULCA). Para 6.3.34 quotes from the ULCA, noting the following key characteristics which are reflected across the receiving local landscape:

- Open arable fields
- Small scale fields
- Emptiness
- Openness

4.1.2 At para 6.3.35 it notes sensitivities including small patches of woodland, springs, open nature of skyline, tranquillity, historic integrity/continuity and the historic settlement pattern, and enclosed meadows. Reference is also made to the influence of pylons and substation, however, no reference is made to the landscape strategy set out in the ULCA which includes objectives to:

- *Conserve the positive features which contribute to local distinctiveness*
- *Reinforce and reinstate historic landscape patterns and features that contribute to sense of place and time depth*

4.1.3 The ULCA goes on to highlight the need to conserve the rural character of the area and to ensure that development responds to historic settlement pattern. However, Chapter 6 does not consider the historic components of the landscape and makes no reference to Historic Landscape Characterisation (HLC) as illustrated on Figure 1 of this report. No consideration is given to historic features such as the hamlet of Brick House End and associated historic enclosure patterns comprising pre 18th Century Irregular Enclosure, linear common associated with Park Green, ancient woodland and historic routeways/tracks such as Blaking's Lane. All of these historic elements remain legible and contribute to present day landscape character. This is considered to be an omission resulting in an inadequate understanding of the qualities and value of the landscape.

4.1.4 Para 6.3.36 acknowledges local variations in character although it does not clearly distinguish the small scale semi-improved pastures (as noted in the Ecological Impact Assessment by Clarkson and Woods), south of Brick House, and more open arable slopes to the west and northeast. Furthermore, it does not distinguish the effect of the pylons and substation on the local landscape, the western part of the development (Zone 5) and southeastern part of the development (Zone 4) being affected by a double line of pylons, whereas land to the northeast and within the more enclosed small-scale pastures to the south of Brick House much less so. Such variations in character influences the value attributed to landscape and susceptibility to particular forms of development. They are therefore a relevant consideration. A lack of finer grained analysis relating to these issues is considered an omission.

4.2 Landscape Value, Susceptibility and Sensitivity

4.2.1 There is no local landscape designation associated with the receiving landscape. Nevertheless, this does not mean that this area lacks value. The LVIA considers the

value of the landscape makes reference to recently Landscape Institute Guidance² on valued landscapes. However, the assessment does not adequately take account of the positive attributes of the receiving landscape. These are set out in the table below:

Value Factor	Chapter 6 Assessment (table 6.4)	Relevant Positive Attributes
Natural Heritage	Actively managed pastoral and arable farmland. No statutory nature conservation designations, no TPOs and no geological interest.	Natural springs Ancient woodlands Semi-improved pastures Species rich hedgerows Local Wildlife sites at Battle's Wood, Park Green, Pelham Centre Meadow.
Cultural Heritage	No specific cultural or heritage connections beyond the ordinary.	Non designated heritage assets inc. pre 18 th century fields patterns, historic lanes and routes, ancient woodlands, historic hamlets. Scheduled monument at The Crump and moated site at Battles Manor and listed buildings at Battles Hall and associated buildings.
Landscape Condition	Generally good, altered by negative influence of substation and pylons.	Good as confirmed in the LCA, but higher in the northeast away from pylons/substation. Higher also in small scale enclosures in the south where hedgerows are intact and area is not intensively farmed.
Associations	None.	None.
Distinctiveness	Not noted for being distinctive and not atypical of the local area.	Locally distinctive 'bowl' and inward-looking landscape and upper reaches of the Bourne Stream.
Recreational	Local PRoWs and no long-distance paths.	Radiating public rights of way and routes extending out of Brick House End Hamlet
Perceptual - scenic	Moderate scenic quality/pleasant working countryside. Substation and pylons locally negative influence.	Pleasant countryside especially away from effects of pylon lines and substation i.e. northeast of site and area of higher enclosure to south of Brick House.
Perceptual – Wildness and tranquillity	Settled, quiet and managed for agriculture. Moderate sense of tranquillity.	Skylark population contributes to perceptions of ruralness as does dispersed settlement and open arable land use. Dark night skies.
Function	No particular function.	Setting to historic settlement of Brick House End and listed buildings.

² Landscape Value and valued landscapes, Technical Guidance Note 02/21, Landscape Institute

- 4.2.2 Para 6.3.45 states that the value of the landscape is medium. However, given the above, it is regarded as higher in the enclosed landscape of the central part of the site (Zones 1 and 6) and in the northeast away from the pylon lines (Zones 2 and 3).
- 4.2.3 The susceptibility assessment (paras 6.3.46-6.3.48) lacks an understanding of the receiving landscape which is described as comprising '*large scale arable fields*'. It does not account for the small-scale, semi-improved pastures, and pre 18th century irregular enclosures to the south of Brick House associated with the springs of the Bourne Brook and hamlet of Brick House End. Topographically the area is described as '*well enclosed and gently undulating*'. Whilst it is correct that the area is separated from wider landscapes to the west, north and east due to topography, the assessment does not adequately describe the area as comprising the upper reaches of the Bourne Brook, the slopes of which form a distinct 'bowl' or 'amphitheatre' of land around the historic hamlet of Brick House End - this is illustrated in Figure 1 of this report. Whilst this may be regarded as locating the development within a natural 'fold' in the landscape it fails to acknowledge that the open agricultural slopes surrounding the upper reaches of the Bourne Stream comprises a broad inward looking and settled landscape which is a perceived landscape unit, and that the proposed development will extend across a significant proportion of it.
- 4.2.4 The LVIA concludes that the susceptibility of the landscape is low (para 6.3.48), and para 6.3.49 goes on to determine the sensitivity of the local landscape to solar energy development as medium. However, the amphitheatre nature of the topography means this landscape is susceptible to south facing solar panel development where lines of panels inevitably run against, rather than along the contours, and where mitigation through planting is harder to achieve due to rising landform. Whilst the separation of this landscape from land to the north due to topography may suggest susceptibility is less, this is not the case where more intimate, inward focused character can increase sensitivity to large scale development which has a substantial footprint. The rural character of the area and historic patterns including settlement pattern and pre 18th century enclosures are also not assessed adequately. As noted above the influence of the pylons is not felt equally across the receiving landscape. Tranquillity and condition of the landscape is higher in the northeast of the local landscape and in the smaller enclosed pastures to the south of Brick House End. The lack of consideration of these factors means that the sensitivity of the landscape to the proposed development is underestimated.

4.3 Viewpoints

- 4.3.1 The LVIA selects 16 viewpoints to assess visual effects of the proposed development. The majority of these fall within the Zone of Theoretical Visibility as shown on Figure 6.4. It is not clear if these viewpoints were selected and agreed with the Local Planning Authority.
- 4.3.2 The viewpoints whilst showing a range of different views from the surrounding landscape, do not include views of development in Zone 1 from footpath 15/5 and 34/39, or the sequential views gained along footpaths which radiate out from Brick House End. There is also no viewpoint in the east which considers the effects of the construction access road and the impact this will have on landscape character and local footpaths.
- 4.3.3 Para 6.3.64 classifies all receptors from Public Rights of Way (PRoW) as high sensitivity but from roads as medium sensitivity. However, receptors using quiet rural lanes for recreation in the vicinity of the site (e.g. Maggots End Road which is a

popular cycle route and the quiet lane leading to Brick House End which is used by walkers as part of the footpath network) should also be classed as high sensitivity.

5 Presentation of Data

5.1 Mapping

- 5.1.1 Figure 6.3 shows topography but this does not adequately show the change in topography of the site and its immediate surroundings where the majority of effects would be felt. The topographic information is hard to discern, the base mapping is missing from the left hand side of the map, and overall it is less informative than a OS 1:25,000 map. It also does not illustrate the ‘amphitheatre’ of land illustrated on Figure 1 in this report, and fails to show publicised local cycle routes which use Maggots End Road.
- 5.1.2 Figure 6.2 Landscape Strategy illustrates the layout of the proposed development and orientation of solar panels as well as the location of inverters. However, it does not show any contours. The overlay plan (Figure 2) in this report, indicates how the arrangement of the panels runs against the contours and also helps illustrate the difference between the elevation of viewpoints, elevation of higher parts of the site and location of proposed mitigation planting.
- 5.1.3 The LVIA makes reference to the division of the site into Zones however none of the plans in Chapter 6 show the zone locations. This is found on drawing LCS032-DZ-01 rev 20. It illustrates that the existing pylon corridor directly affect Zones 4 and 5 and that Zones 2 and 3 are located some distance to the north and Zones 1 and 6 are located in the smaller scale pastures.
- 5.1.4 Chapter 6 provides no mapping of the Historic Landscape Characterisation for Essex which illustrates the range of historic enclosure patterns within the site and surrounding landscape including early enclosure patterns reflecting pre 18th Century irregular enclosures and areas of post 1950s boundary loss, as well as historic woodland including Pump Springs Wood and Battle’s Wood and historic routes. Nor is there a map of local natural and cultural features - elements of the landscape which contribute to local character and sense of place. The Heritage Statement does include a series of maps showing heritage designations and features including listed building and scheduled monuments which lie within the immediate vicinity of the proposed development, but these are not referred to in Chapter 6. The historic map below and aerial photograph (appendix 2) illustrate the small-scale historic landscape enclosure pattern which remains intact south of Brick House End, as well as historic routes and settlement pattern.



Copy of historic plan showing Berden Parish with its pattern of enclosures, associated settlement, routeways and woodlands, much of which is still legible in the landscape today.

5.2 Photographs and Visualisations

- 5.2.1 Chapter 6 includes photographs relating to the 16 selected viewpoints showing a selection of summer and winter views. The images are useful and reflect published guidance. However, they would benefit from having the geographical extent of the solar panels/development zones annotated. This would give a much better impression of the scale and extent of the proposed development.
- 5.2.2 Given the extent of the proposed development surrounding Brick House End and the close proximity of some views, it is not possible to capture the full extent of the development within a single frame. This is addressed though two views from some locations e.g. 4A and 4B. However even this approach does not reflect the full panorama of views of the development from some locations such as footpath 15-5 (Viewpoint 6). In reality, a much wider area of development would be visible from each location - this is a significant limitation of the presented visualisations. LI Guidance on Visual Representation of Development Proposals (Sept 2019) states in para 81.2 that *'where it is important to communicate the wide-angle nature or context of the view, panoramas are preferable to limiting the view by cropping'*.
- 5.2.3 Viewpoint 6B is incorrectly labelled as looking towards Zone 1 and the substation but the latter is outside of the view to the left.
- 5.2.4 Photomontages are provided for viewpoints 5, 8 and 11 but no explanation is provided as to why these viewpoints were selected. Photomontages should be used to demonstrate the worst-case effects of the proposed development. Some of the greatest effects will be from viewpoints associated with Brick House End looking east. No photomontage from Viewpoint 7 is therefore regarded as an omission.

6 Landscape Effects

- 6.1.1 The landscape effects of the proposed development are separated out into effects on landscape elements (paras 6.4.10-6.4.22) and landscape character (paras 6.4.23-6.4.24). Consideration is given to effects during construction and operation.

6.2 Landscape Elements

- 6.2.1 Chapter 6 assess the effects on the landscape elements of the site including ground cover, topography, tree and hedge resource and public rights of way. This analysis primarily considers the physical effect of the proposed development on these specific components of the landscape.
- 6.2.2 In terms of landcover the assessment describes the grassland in Zones 1 and 6 as comprising improved grassland however reference to the Phase 1 Habitat Survey shows that it is semi-improved grassland - refer to Figure 8 of Ecological Assessment and paras 2.5.11- 2.5.14 (copied at Appendix 2 of this report for convenience). The Ecological Survey stated that *'The semi-improved grassland on site has a modest floristic diversity...overall the semi-improved grassland habitat was considered to be a site of ecological importance.'*
- 6.2.3 The proposed development will result in the loss of semi-improved grassland to the south of Brick House to allow for the introduction of solar panels (Zone1), substation (Zone 6) and access road. Disturbance to these small-scale pastures (which reflect pre-18th century enclosure and are likely to have never been ploughed) and their associated soils, would be adverse. These reflect an important and irreplaceable environmental resource, and this has not been adequately taken into account in the LVIA.
- 6.2.4 Over the wider site, the proposed development would result in a change from arable to pasture. This is recorded in para 6.4.13 as delivering a low beneficial effect. Whilst the increase in pasture may be considered beneficial, it is noted that only a small proportion of the grassland created will comprise wildflower meadow, the remainder comprising a grassland mix for grazing. This is described in the LVIA as permanent pasture but given that the development is for 40 years, after which time it is to be removed, the 'permanence' of grassland is not guaranteed. Furthermore, it is not correct to conclude that the proposed change in landcover will be beneficial to landscape character. This is because the solar panels will rest above much of the grassland, and will be the predominant visual land use when viewed from the surrounding area, as illustrated in the photomontages.
- 6.2.5 In terms of effects on topography, the LVIA considers the site to have a sloping landform which is *'uncomplicated'* and *'low value'* (para 6.4.14). However, the very fact that the site comprises valley slopes which drop in height from c. 122m AOD to 108 AOD in the western part of the site and c. 118m AOD to 106m AOD in the east of the site indicates a susceptibility greater than low. The introduction of access tracks and battery units and inverters will require some alteration of topography and the visual prominence of the solar panel rows and associated development, coupled with extent, will give rise to characterising effects, visually masking the underlying topography as illustrated on the photomontage from Viewpoint 8. Furthermore, the

overlay plan at Figure 2 illustrates how the lines of solar panels will not follow the gently undulating landform across the Application Site (contrary to para 6.4.59).

- 6.2.6 Chapter 6 states that there will be limited removal of hedgerow (c. 5m for the access track) and that given the extent of the resource this is regarded as negligible. Furthermore, the overall net gain of new hedgerow and tree planting as part of the development is considered to deliver a major beneficial effect (although it should be noted that the proposed landscape enhancements could all be achieved without the proposed development). Para 6.4.56 goes on to conclude that the development would respect the field pattern and landscape scale. However, the infilling of the open fields with solar panels would result in the masking of the current field pattern across the slopes within this ‘bowl’ of landscape, especially on the eastern side (zones 2, 3 and 4). This would be particularly felt in views from Brick House End looking east, however there is no photomontage from Viewpoint 7 to demonstrate this.

6.3 Landscape Character

- 6.3.1 As noted above, the LVIA lacks analysis regarding variations in landscape character within the receiving landscape and the distinction of the wider arable fields on the valley slopes and the smaller scale pastoral fields and woodland to the south of Brick House. These landscapes have different characteristics and qualities which also influence judgements on landscape value and susceptibility to the type of development proposed. Effects on landscape character are described in paras 6.4.56 – 6.4.70 of the LVIA. The following observations are made:

- The receiving landscape is considered to reflect a more compartmentalised landscape, but this fails to recognise the role of topography in creating an inward ‘amphitheatre’ at the centre of which is Brick House End and from which the proposed development would be visible extending up the surrounding slopes especially to the east.
- Although topography may limit views from the wider landscape, where there are views within the local landscape, the scale and extent of development would be extensive. The current aesthetic, perceptual and experiential qualities of the receiving landscape would be substantially altered.
- Whilst the panels would be no more than 3m in height, they would extend across slopes which increase in elevation by 12-14m and the strong geometric lines would run contrary to contours. They would not *‘respond to the topography of the surrounding area’* (para 6.4.15) and from some locations the panels are likely to be seen on the skyline – Viewpoint 7 north of Battles Wood.
- Proposed mitigation planting, in association with the proposed development, will foreshorten views, altering landscape perceptions and sense of place.
- Proposed planting would not screen development altogether nor reduce visual effects to zero.
- The NCA 86 and Uttlesford LCA describe the area as rural despite the presence of pylons. Zones 4 and 5 are the only parts of the proposed development directly affected by these pylons. In views of zones 2, 3 and 4 from the west the pylons only affect a small part of the view to the south, the remaining areas of agricultural land are unaffected (refer to Viewpoint 7). Large areas of panels and associated infrastructure would increase the perceived human influence on the landscape in this area and erode its intrinsic rural character

- The extent of development will change the land use and appearance of field enclosures affecting land cover patterns and character of the slopes surrounding Brick House End.
- Chapter 6 does not consider the impact of the substation and Zone 1 on the small-scale pastoral character of the fields in the central part of the development. This development would be located within this smaller scale wooded landscape causing fragmentation of the pattern and significantly altering its rural and more intimate qualities, especially experienced from footpath 15/5 and 34/39.
- The reduction in extent of the proposed development in the north around Blaking's Lane would not mitigate effects from the southwest due to the angle of the views (e.g. there would be no reduction in effects from Viewpoint 7).
- Pulling development back in the south again would not reduce the impacts on the views from properties at Brick House End, nor the access lane or Viewpoint 7 –perceptions of the extent of development from these locations will not alter.
- Whilst the development may not be widely visible beyond 1km, this does not lessen the effects felt within this radius. The perceptual and sensory aspects of the landscape would not be retained. The extent of the proposed development especially to the east would not fit well with the existing field pattern and scale of the landscape. Although field boundaries may not be removed, the infilling with solar panels, and the strong lines they will create will mean field patterns will be obscured.
- The key characteristics of open slopes, ruralness, emptiness, openness and tranquillity would not be retained within 1km of the proposed development. Similarly, a sense of historic integrity and continuity would not be retained.

6.3.2 By virtue of the scale and extent of development proposed in the upper reaches of the Boune Brook and in the vicinity of Brick House End, the assessment of landscape characterising effects is considered to be underestimated. Combined with an underestimation of sensitivity, the LVIA has downplayed the landscape characterising effects. In reality, the landscape characterising effects within 1km of the site would be significant and adverse and would transform the small bowl landscape which surrounds the hamlet of Brick House End.

6.3.3 Whilst on plan the proposed development may be argued to comprise two modest scale developments (Chapter 6 para 6.4.66), one to the west and one to the east. In reality, people moving through this landscape and residents at Brick House End are unlikely to make this distinction. The sequential experience and views from PRoW in the vicinity of the site will result in a perception of the proposed development continuing over a considerable distance and surrounding the hamlet of Brick House End. This would not amount to a low magnitude of change in landscape character, as concluded in para 6.4.67.

6.3.4 In terms of the impact on the receiving landscape comprising the 'bowl' surrounding Brick House End hamlet, the landscape effects would be moderate-major adverse and significant. Much of this local landscape would be perceived as a solar farm landscape.

7 Visual Effects

7.1 Viewpoints and Visualisations

7.1.1 Appendix 6.6. sets out the detailed analysis from each of the 16 selected viewpoints.

7.1.2 GLVIA is clear on page 115 that when assessing visual effects, and the magnitude of change, attention must be given to:

- Size and scale – including affects on composition, scale, mass, lines, height, colour and texture
- Geographical extent (field of view affected)
- Duration

7.1.3 This is considered in more detail in relation to Viewpoint 7 and 6.

Viewpoint 7

7.1.4 It can be seen from Viewpoint 7, which is representative of views from the west, associated with access to and the settlement of Brick House End, that the solar panels would be seen end on along the rows which would rise up the valley slopes. In some places, such as to the north of Battles Wood, panels would be seen on the skyline. Their introduction would create strong lines in the landscape, alter the composition of the field enclosure pattern, and their height and colour would obscure topography and patterns and textures associated with agricultural open arable slopes. In terms of geographical extent almost all of the 180 degree angle of view would be affected. The proposed mitigation including the drawing back of panels in the south and north, would do little to reduce the effects. The duration would be for 40 years and given issues regarding climate change may well continue for much longer, possibly becoming permanent. From this location the whole of the eastern side of the development would be visible extending over c. 0.80km.

7.1.5 The elevation of Viewpoint 7 is c. 109m AOD. Gappy hedgerow on the edge of Zone 2 is located at c. 107m AOD, as the land drops slightly before rising again to 118m on the skyline left of Battles Wood. The detailed assessment of visual effects records the existing vegetation on the edge of the site as ‘heavily screening views’ of the newly installed development but this simply cannot be the case given the rising landform beyond the hedgerow is clearly discernible in the photograph. The description of the magnitude of change in Appendix 6.6 does not describe the loss of openness, the lines of the solar panels and given the mitigation planting would comprise a double daggered hedgerow and some trees at lower elevation than the viewpoint, it overestimates the effectiveness of the proposed mitigation. Overall, the assessment is considered to be inadequate and downplays the scale of effects. The effects would not reduce to low magnitude over time. At best they may reduce to moderate adverse but nevertheless remain significant.

Viewpoint 6

7.1.6 Similarly Viewpoint 6 underestimates the effects of the proposed development – primarily focusing on views east. In these views Hedgerow 4 (3m in height) does not screen the land rising beyond, illustrating the inadequacy of 3m high hedgerows and single lines of trees in mitigating effects. Furthermore, the analysis associated with

Viewpoint 6 does not describe the nature of change which will result from the proposed development i.e. views along the lines of the solar panels end on. It concludes that development in Zone 6 and 1 would be screened, and makes no reference to filtered views through to Zone 5 in the west. No reference is made to the taller elements associated with the substation which are more likely to be visible. Overall, therefore, the effects of the proposed development on views from this location are again considered to be underestimated.

- 7.1.7 The judgements in the LVIA rely on the topography and vegetation of the wider landscape to conclude that the visual effects of the proposed development would be limited. Whilst this is true in terms of the effects being relatively limited in extent, it is not the case regarding the significance of effects on views from within the upper reaches of the Bourne Brook, where the topography creates a distinct 'bowl'. This would result in significant adverse visual effects, especially evident in the eastern half of the proposed site when viewed from the west. In these views the orientation of solar panels, relative to the valley slopes, and the surrounding nature of the development in relation to the hamlet of Brick House End would result in significant adverse effects.
- 7.1.8 All footpaths extending out of Brick House End would be adversely affected by the proposed development for much, of their length. The current visual amenity afforded by these footpaths is of open views across the slopes to the rim of higher land and distinctive woodland blocks such as Battle's Wood and Pump Spring Wood. For footpath 15-5 filtered views of the development would be visible in three directions to the west, south and east, affecting a c. 270 degree angle of view. The visual amenity afforded by these footpaths would be substantially altered for the duration of the development and in many instances would be difficult to mitigate to any meaningful degree.
- 7.1.9 Where views are across more level topography the proposed mitigation planting of new hedgerows and trees is likely to be more effective subject to extent and seasonal variation e.g. Viewpoint 1. However, in relation to Viewpoint 4 it is noted that the land is rising towards the southern part of the site as evidenced in the extent to which the middle ground pylon is seen against a backdrop of land. Mitigation planting comprising hedgerows with trees in the fore/mid ground is therefore unlikely to fully mitigate views of solar panels in Zone 5 which extend onto this higher land. This would have implications for residential amenity of properties that look southwest e.g. Highfields and Southfields.
- 7.1.10 At best, proposed mitigation vegetation will filter views of the development but would not reduce the scale and extent of the proposed development which would be perceived from adjacent footpaths as rising up and extending across visible slopes.

7.2 Residential Receptors

- 7.2.1 A separate Residential Amenity Assessment has been carried out (without access to individual properties) and is set out in Appendix 6.6. This assessment has been reviewed and site visits made to Brick House, Brick House End Cottages 1 and 2, Great Mimms and Southfields to consider views from ground floor, upper stories and rear gardens. and has been carried out in broad terms, without accessing individual properties. It is recognised that residential amenity includes all aspects including visual, noise, vibration etc. In relation to the proposed solar development the effects

are primarily visual although the noise emissions from the proposed substation to the south of Brick House End is also relevant.

- 7.2.2 When assessing residential visual amenity the ‘Lavender test’ requires a visual intrusion to be of such a magnitude as to render a property an unattractive place to live. This makes clear it is not the simple visibility of a development but also consideration of the number, size and proximity of the development such that it represents an unpleasantly overwhelming and unavoidable presence in main views from a house or garden such that there is every likely that the property concerned would come to be widely regarded as unattractive (rather than simply less attractive) place to live.
- 7.2.3 Views from ground floor windows on principle elevations and rear gardens are considered to be highly sensitive, while views from upper floor windows are of lower sensitivity.
- 7.2.4 Para 2.10 of the RVAA states that in general, magnitude of change decreases with distance. However, this is less likely where development is located on rising land – and no reference has been made to the elevation of the properties relative to the development.
- 7.2.5 The RVAA also considers direct or oblique angle views as influencing magnitude of change, however, where the field of views is wide, and the proposed development extends across the field of view, then the overall extent of development visible is more influential. Furthermore, the layout of the site is influential on views – panels seen front on may create a dark mass of panels with individual rows less discernible, panels seen end on create strong linear lines in the landscape, especially when viewed on rising land.
- 7.2.6 The extent to which views are interrupted or obscured by vegetation or built development is also a consideration, however on open arable and rising slopes there is less chance for vegetation to obscure development.
- 7.2.7 Finally, the extent to which current views are influenced by built structures is a consideration. However, many of the views from properties at Brick House End are not affected by the lines of pylons which run from the substation and are located across Zones 4 and 5 only.
- 7.2.8 The RVAA considers Rose Garth and Brick House End Cottages No 1 and No 2 as the tree closest properties to the development with the least restricted views (para 6.2.69). Nevertheless, all six properties within Brick House End hamlet are affected by the proposed development to some degree as set out in the table below.

Property	Nature and extent of views
Rose Garth	Views of Zones 2, 3 and 4 from ground floor and front garden, ingress and egress
Great Mimms	Views of Zones 2 and 3 from upper storey windows and from front driveway, ingress and egress
Brick House End Cottages No 1 and 2	Views of Zones 2, 3 and 4 from ground floor living spaces and upper storeys at rear and rear garden, ingress and egress
Brick House	Views from east facing elevation to Zones 2, 3 and 4. Views from south elevation upper storey windows to Substation, views from rear garden to Zones 2, 3, 4 and 5, ingress and egress
Southfields	Views from upper storey windows south elevation to Zone 5, ingress and egress

7.2.9 The RVAA judges the magnitude of change on all three properties (Rose Garth and Brick House End Cottages No 1 and No 2) as high at Year 1, i.e. a change in view that on balance has a defining influence on the overall visual amenity of the residential receptor. The effect would be major adverse and significant. Views from these properties would not continue to be defined by the rural open arable slopes. The extent of the development from the mid ground to the horizon would be solar panels and associated infrastructure. The RVAA goes on to judge these effects to decrease in Year 5 to low (defined as some change in the view that on balance is visible although has a *subservient* influence) and in year 10 to negligible (defined as no change or small to *imperceptible* visual influence). This is considered in more detail below and photographs from these properties is provided in Appendix 2 of this report.

7.2.10 From Rose Garth the views are from the ground floor level and highly sensitive. The front elevation of the property looks directly onto Zones 2 and 3 of the development and to the highest rising land north of Battles Wood at c. 118m AOD, it also includes views to the south which are lower lying and towards the existing pylons. Foreground land is falling away to the southeast. Mitigation planting is located on the edge of the development on this lower lying land e.g. strengthening of H6 on the edge of Zone 2, and between Zone 3 and 2 at c. 110m AOD. Both areas of planting would comprise a double staggered row of predominately hawthorn hedging and a single line of trees. The RVAA considers this to be sufficient to create a 'robust screening feature' mitigating the development which comprises elements which are 2.75-3m high and on slopes which rise 7m. The effectiveness of proposed planting can be seen in Photomontage from Viewpoint 8, Year 5. This demonstrates that even where you have an existing hedgerow and additional mitigation planting, views are at best only filtered. This contrasts with the description of this boundary planting in the LVIA Detailed Assessment Viewpoint 8 which states it creates a '*strong and dense visual barrier*'.

7.2.11 Distance from the development would not in this instance mitigate views due to the development. These views would be face on to the development which is located on open slopes. Similarly views of existing pylons to the south would not reduce

perceptions of change because the pylons are only visible at some distance and obliquely, whereas the proposed development will spread across the field of view. Zones 2, 3 and 4 would be viewed together as a single scheme. The presence of the solar panels arranged in rows seen end on would create strong lines which would draw the eye and would obscure topography and field patterns. The extent of development in views would be unavoidable from the main frontage of the property and on ingress and egress from the property.

- 7.2.12 The proposed mitigation may restrict and filter views of the development, but it will not remove views of the development altogether and given the lateral spread of development across the field of view, the judgement that the effects on the property would be low in Year 5 and negligible in Year 10 is considered to be an underestimation. The lack of a viewpoint from this location in the LVIA is regarded as an omission.
- 7.2.13 The effects of the proposed development on Brick End Cottages 1 and 2 are similarly underestimated. Views would be possible from ground floor living spaces and the rear garden as well as upper storey windows. Here the development would extend across the entire width of the view, in a landscape where there are no other built elements (including no pylons) and on rising open slopes. The solar panels will be seen end on, creating strong lines which will draw the eye. A hedgerow and line of trees along the western edge of Zone 2 and located 240m away on lower lying land (108m AOD), would not screen views. Nor would a new hedgerow 420m away on slopes at a similar elevation to the viewpoint (c 112m AOD). Immediately behind this latter proposed planting there would be 3m high inverters, and behind that, lines of solar panels rising onto the highest land at 118m AOD, which would be seen breaking the skyline. Given the location of Cottages 1 and 2, relative to the layout of the eastern side of the development, there would be a perception that the extent of development, would wrap around the property.
- 7.2.14 Of all the effects on each of the properties in Brick House End hamlet, it is considered that those experienced by Brick House End Cottages would be most significant. Give the proximity of views and their extent it is considered that these properties would widely be regarded as an unattractive place to live where the proposed development would have an unavoidable presence. Nevertheless, even if this was judged not to be the case, it is clear that the settlement of Brick House End would be significantly affected by the proposed development. In summary the development would affect all properties within the settlement to some degree, would affect daily ingress and egress and would also affect all public rights of way which radiate out from the settlement to the northwest, southeast and south. This means that the people who live at Brick House End would not be able to escape the proposed development in their daily lives, simply because of the scale, location and extent of proposed development relative to the hamlet. The removal of solar panels from the north and southern parts of the eastern side of the development, as part of mitigation, would do nothing to lessen these effects.

8 Cumulative Effects

- 8.1.1 When considering the cumulative effects of different solar schemes it is important to consider how different developments relate to each other, their frequency as one moves through the landscape and their visual separation. Combined effects on landscape character and views can be experienced resulting in greater incremental effects.
- 8.1.2 Chapter 6 of the ES includes consideration of the cumulative effects of the proposed solar array at Pelham Spring following a screening opinion issued by the Planning Inspectorate. In particular the proposed solar development at Berden Hall Farm, Solar Farm near Stocking Pelham and Stocking Pelham Battery Energy Storage System are considered as part of the cumulative assessment.
- 8.1.3 The LVIA concluded that there would be little visual cumulative effect because the Berden Hall scheme coupled with this proposed scheme, would not be visible in the same view. Only Viewpoint 8 was noted as having views to both schemes, but not at the same time as they would be seen in opposite directions. Nevertheless, this succession of views and sequential cumulative effects is significant, not just from Viewpoint 8 but also in terms of perceptions of the landscape when using Brick House End Lane and footpaths in the area, where one would first experience this application solar farm and then immediately Berden Hall solar farm. This would substantially extend the effects of solar farm development in the area and increase perceptions of travelling through a solar farm landscape over 2km in extent. It would further exacerbate the effects on residents of Brick House End hamlet.
- 8.1.4 Para 6.5.49 acknowledges that some PRow have the potential to offer sequential cumulative views but goes on to downplay these effects on the basis that mitigation planting will substantially reduce views and characterising effects. As indicated above the ability of the proposed mitigation planting to successfully reduce the effects of the scheme is considered to have been over estimated.

9 Conclusions

9.1 Summary of Effects

- 9.1.1 The sensitivity of the local landscape to the proposed development varies. It is considered that the open arable slopes to the northeast and the small scale pastoral landscape to the south of Brick End Farm have a greater value and are more susceptible to the proposed development and therefore have a greater sensitivity than the open farmland in the vicinity of Zones 4 and 5 where there is existing overhead wires and pylons. This variation in sensitivity has not been taken into account when assessing landscape characterising effects on the local landscape, or in designing the layout of the scheme.
- 9.1.2 The level of landscape effect of the proposed development should not be downplayed simply because the wider landscape is either minimally or not affected by the development. This proposed development extends across 79.28 hectares (i.e. it is a very large solar scheme) within a landscape that forms the upper slopes of the Bourne Beck and forms a broad but clearly defined 'bowl' or unit of landscape which is readily perceived. This local landscape would be transformed by the proposed development given its scale, extent and the position of lines of solar panels relatively to topography. A lack of effect on a wider area does not lessen the level of effect at the local level where the proposed development will become a defining element, visually disrupting land cover patterns and significantly detracting from the current rural character of the area.
- 9.1.3 The proposed development would have a profound effect on the settlement of Brick House End affecting all six dwellings to some degree, ingress and egress from the properties and all public rights of way which radiate out from the hamlet.
- 9.1.4 The sixteen viewpoints selected in the LVIA do not adequately reflect the nature of the visual effects of the proposed development. There is insufficient analysis of views from Brick House End Lane, properties in Brick House End and from the PRoW 15/5 and 34/39 which runs close to Zone 1 and the Substation. The photomontages do not illustrate the nature of the effects as seen from Rose Garth and Brick House End Cottages 1 and 2, and fail to illustrate the visual effects of lines of solar panels extending up rising slopes.
- 9.1.5 The ability of the existing vegetation and proposed mitigation planting to effectively reduce the effects of the proposed development has been overestimated. This is because a hedgerow and single line of trees will only ever filter views at best, especially when views are straight on to the development, and where existing intervening planting or proposed mitigation may be at lower elevation, and where land behind any mitigation would contain solar panels, inverters, fencing and CCTV cameras on rising slopes.
- 9.1.6 The proposed additional mitigation, including the removal of panels to the north and south of the scheme, does nothing to reduce the level of effects experienced in the centre of the area around Brick House End hamlet.
- 9.1.7 Cumulative effects would arise as a result of the proposed development in combination with the Berden Hall Solar Scheme in terms of sequential views and effects on perceptions of the landscape when using Brick House End Lane and public

rights of way in the area. These effects would not materially diminish as a result of mitigation planting.

- 9.1.8 In conclusion Chapter 6 of the ES is not considered to be a fair representation of the effects of the proposed development. The temporary or reversible nature of the scheme whilst feasible and enforceable would leave the scheme in place for 40 years which is a considerable timescale. Given the current concerns regarding climate change and role of solar development in providing clean energy, it is highly likely the scheme will become a permanent feature
- 9.1.9 The development would not conserve the key characteristics of the landscape including its openness, historic pastures, open arable slopes and the reinstatement of hedgerows should not be taken as reinforcing historic landscape patterns when these patterns will not be discernible due to the introduction of the development itself. Furthermore, the proposed mitigation would not be effective and local topography would increase effects on the local landscape.
- 9.1.10 Overall, the adverse landscape and visual effects of this scheme would be contrary to the Overarching National Policy Statement for Energy (EN-1), NPPF and Local Plan Policy and should way against any benefits of the scheme.

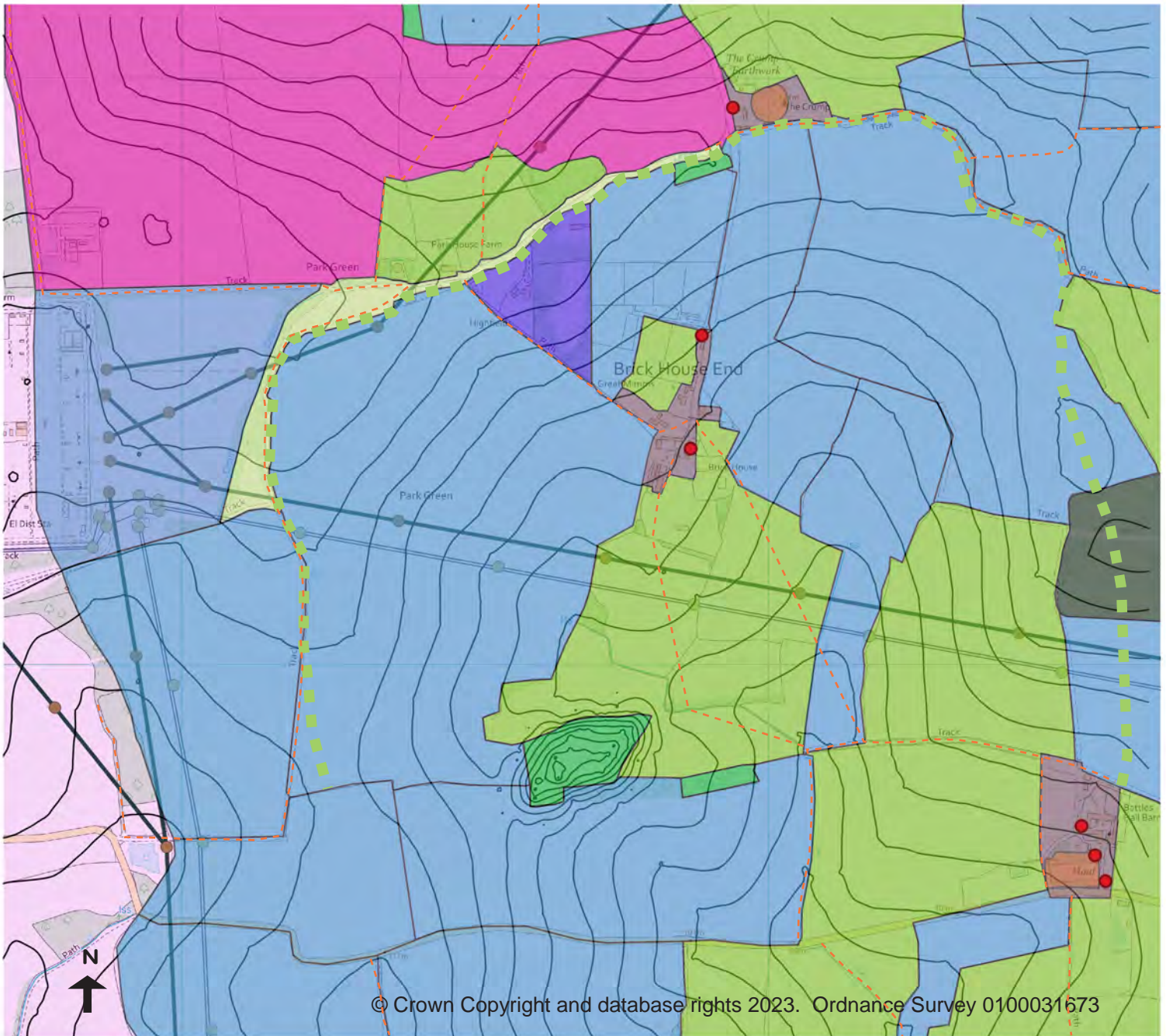
Appendices

Figure 1 - Historic Landscape Characterisation and Contour

Figure 2 - Overlay of Scheme Layout and Contours

Appendix 1: Extract from Ecology Assessment

Appendix 2: Photo Panels

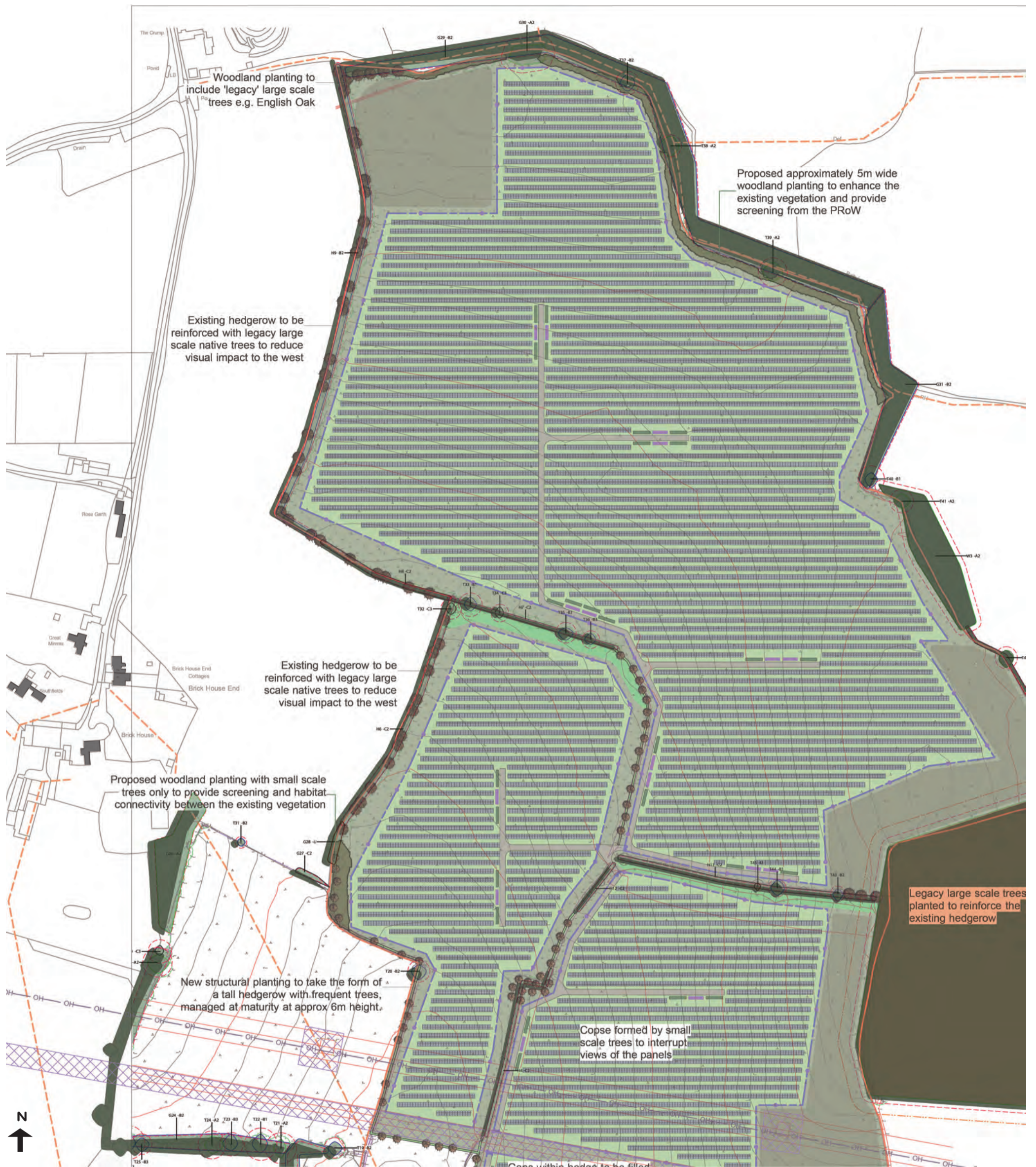


Key

- | | | | | | |
|--|-------------------------------|--|--------------------------------------|--|----------------------|
| | Public right of way | | Scheduled Monument | | Post 1950s enclosure |
| | Listed buildings | | Contours | | |
| | Built up areas | | Ancient woodland | | |
| | Post 1950s boundary loss | | Pre 18th Century irregular enclosure | | |
| | Common with built margin | | Post 18th Century enclosure | | |
| | 19th -20th Century plantation | | Visually significant ridgeline | | |



Pelham Springs Solar Farm
Figure 1:
 Historic Landscape Characterisation and Contours



Pelham Springs Solar Farm

Figure 2:
 Layout of Solar Panels and Topography in Eastern Area and Properties at Brick House End
 (Extract from Figure 6.1 Chapter 6 ES)



Photo 2: Game Cover Crop

Evaluation

- 2.5.10 The land within the cultivated arable fields holds very little intrinsic value for biodiversity. The field margins were not representative of the local BAP habitat 'Cereal Field Margins'. Overall, arable habitat is considered to be of **Site Importance**

The relative importance of the arable habitat for species or species groups associated with the habitat is assessed individually (in Section 2.6 below) so as to avoid pseudo replication within the impact assessment.

Semi-Improved Grassland

Field Survey Results

- 2.5.11 Field 7 and 8 (Figure 5 refers) consisted of semi-improved grassland. Discussion with the farmer informed that these fields are occasionally rented as horse pasture. At the time of the survey, no horses were present within the fields.
- 2.5.12 Grassland within Field 7 and 8 were broadly similar with a short sward (30cm in average) and dominated by grass species. The following grass species were recorded: barren brome, meadow foxtail, common bent *Agrostis capillaris*, Timothy *Phleum pratense*, false oat grass, Yorkshire fog *Holcus lanatus*, cock's foot grass and perennial ryegrass. Flowering species present included teasel *Dipsacus fullonum*, red clover *Trifolium pratense*, common mouse-ear chickweed *Cerastium fontanum*, creeping cinquefoil *Potentilla reptans*, bush vetch *Vicia sepium*, meadow buttercup, creeping buttercup, germander speedwell *Veronica chamaedrys*, hogweed, common knapweed and lesser celandine *Ficaria verna*. There was an overall absence of structural diversity although small tussocks were starting to form in places.



Photo 3: Semi-improved grassland within Field 7



2.5.13 The south-east corner of Field 9 appeared to be left as set aside at the time of survey in June 2021, see Target Note 20 Figure 5. The grassland contained a modest diversity of grasses and included the following broadleaved species: oxeye daisy, red campion *Silene dioica*, knapweed, brome species and cut-leaved crane's-bill *Geranium dissectum*.



Photo 4: Set Aside in Field 9

Evaluation

2.5.14 The semi-improved grassland on Site has a modest floristic diversity and lack of structure [REDACTED]. Overall the semi-improved grassland habitat was considered to be of **Site** ecological importance.

Hedgerows

Desk Study Information

2.5.15 Ancient and/or Species Rich Hedgerows and Green Lanes Ancient are listed as Essex local BAP habitat. Hedgerows are a Habitat of Principal Importance under Section 41 of the Natural Environment and Rural Communities Act 2006 (NERC Act). Hedgerows are also afforded some protection under the Hedgerows Regulations (1997).

Field Survey Results

2.5.16 The majority of fields within the Survey Area were bounded by hedgerows. The ecological quality of the hedgerows varied widely in terms of species-richness, management and structure, intactness and the presence of standard trees. The key features of the hedgerows are set out in Table 3 below. The numbering of hedgerows is shown in the Phase 1 habitat map in Figure 5.

Table 3: Descriptions of Hedgerows within the Survey Area

Hedge No.	Classification	Length (m)	Height (m)	Width (m)	Ditch Along ½ Length
H1	Defunct species-poor hedgerow with standard trees	285	2	2	Yes (wet)
H2	Intact species-poor hedgerow	200	2	2	No
H3	Defunct species-poor hedgerow with standard trees	120	5	2.5	Yes (dry)
H4	Defunct species-poor hedgerow with standard trees	45	3	1	Yes (dry)
H5	Defunct species-poor hedgerow with standard trees	205	5	2.5	Yes (wet)
H6	Intact species-poor hedgerow	50	3	2	Yes (wet)

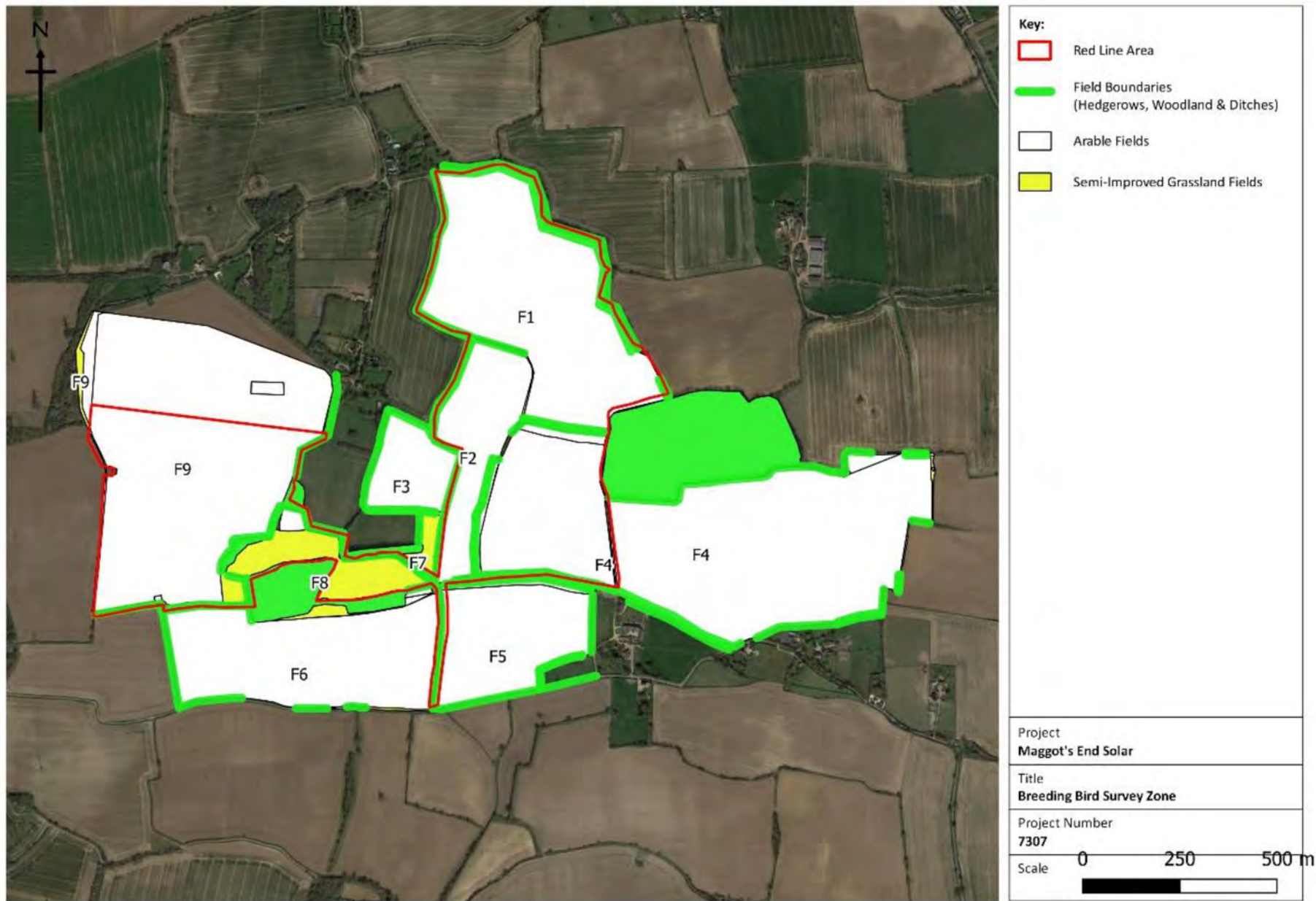


Figure 8: Map showing Habitat/Boundary Zones



Aerial View of site and Brick House End

This aerial view illustrates the smaller scale enclosure pattern and pastures associated with Brick House End relative to areas where there has been field boundary loss. It also illustrates the blocks of woodland and historic routes.



View from Brick House End Cottage 1 rear garden looking east towards Battle's Wood on skyline

The hedgerow in the middle ground will form the edge of the solar farm and will be strengthened with tree planting as part of the proposals. The development will extend across the width of this view and comprise solar panels which will be seen end on as linear rows. As evident in this image a hedgerow is unlikely to screen views, with proposed planting at best filtering views to the solar panels, fencing and CCTV camera posts. There would be views from the garden where the solar farm will be perceived as wrapping around the property extending over 180 degrees in the field of view, ground floor living space inside the property and first floor windows. Where there is no skyline vegetation, the development would break the skyline.



View from Great Mimms first floor windows looking northeast

Vegetation on skyline is that along Blaking's Lane with Battle's Wood visible to the right of the picture – the height of the ridgeline is c.118/117m AOD. The hedgerow in the middle ground (H8) will form the edge of the solar farm and will be strengthened with tree planting as part of the proposals. The development will extend across the width of this view and comprise solar panels which will be seen end on as linear rows. As evident in this image a hedgerow is unlikely to screen views, with proposed tree planting at best filtering views to the solar panels, fencing and CCTV camera posts.