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Our Ref: CEC4229 **16 March 2023**

Gareth Elliot
Planning Development Officer
Melton Borough Council
Station Approach,
Burton Street,
Melton Mowbray,
Leicestershire

Dear Gareth

RE: CEC4229 – Review of Pegasus Group's Landscape Rebuttal on CEC's Review of the Submitted LVIA for Easthorpe Solar Farm – Muston Lane – Vale of Belvoir – Reference 22/00537/FUL

1. Introduction

1.1 I write to provide a review of the Landscape Rebuttal to my original independent Landscape Review (dated 01.12.2022 hereafter referred to as the CEC Review) of the Landscape and Visual Impact Assessment (LVIA) and Appendices prepared by Pegasus Group (January 2022) for the above 49.9MW solar farm (hereafter referred to as the Development) within the Vale of Belvoir.

1.2 Prior to the preparation of this Landscape Rebuttal (hereafter referred to as the Rebuttal) Kathryn Ball of the Pegasus Group called me to discuss matters raised in the CEC Review. This was a very brief conversation which I followed up with an email of matters discussed during the call.

1.3 The following responds to the matters raised in the Pegasus Rebuttal.

2. The height at which proposed and existing hedges are maintained

2.1 The Rebuttal clarifies (under item 2.3) that the hedges will be maintained at a maximum of 3m height, and this was not disputed in the previous landscape comments. The CEC Review wanted to clarify that if a hedge is 'maintained' at 3m (i.e. cut to a height of 3m) then there will be growth on top of this before the hedge is cut again. Therefore for the hedge to not exceed 3m it will need to be 'maintained' at a much lower height to allow for seasonal growth before the next cut. Being unfamiliar with the timings of rotational cuts of hedges in this area, it is not possible for me to comment on the time period between hedge cuts, or how much growth the hedges can put on in this time. The result is that for a hedge not to exceed 3m in height between cuts it is likely to be maintained/cut to a much lower level. This would in turn provide reduced mitigation for the adverse visual effects experienced by those viewing the development over the hedges.

2.2 The Layout and Landscape Strategy drawing P19-2022_10 labels existing and proposed hedges as 'maintained at a maximum height of 3m'. Item 2.4 of the Rebuttal states:

> *'A maximum of 3m has been specified to ensure the hedgerows match the proposed panel height. The maximum height merely suggests a limit to the hedge height and does not state that they should be maintained at 3m in absolute terms.'*

2.3 The LVIA has shown the importance of the hedges being maintained at 3m, as this height of hedge was assessed in the LVIA as reducing a Major significant visual effect to a Moderate visual effect which the LVIA then considered not significant.

2.4 The Pegasus' Supplementary Environmental Information (SEI) submitted to Gareth Elliott on 20th February 2023 also states that:

> *'The rebuttal identifies the proposed mitigation measures of newly planted hedgerows to grow and be maintained for a maximum height of 3m aims to mitigate potential significant effects identified within the ES chapter. This height could be reduced however there would be resulting potential major adverse significant effects on PRoW receptors within or close to the site.'*

2.5 Item 2.4 of the Rebuttal also states:

> *'The proposition of maintaining hedgerows at an increased height is a common approach to alleviating potential major effects on visual receptors. The screening of panels utilising existing hedgerows maintained to the height of the proposed solar panels* ***(up to 3m) or above***[1]*, is an effective way of ensuring the existing field structure is maintained whilst providing a screening function'*

2.6 However a more detailed examination of the Public Rights of Way (PRoWs) which run along the boundaries of the site show approx. 2,280m of PRoW which have an existing or proposed hedge on one side and the site fence on the other (no hedge). This is the case for the whole of the PROW along Winter Beck. Here the identified Major significant adverse visual effects of the solar array will not be mitigated by any new hedges.

2.7 In the phone call and following email I made clear that '*consideration needs to be given to the impact on landscape character and views of 3m high hedges which do not reflect the character of the Vale, versus hedges maintained at 2m where the rows of solar panels will become visible above the hedges*.'

2.8 My judgement on the need for hedges in the local landscape to be maintained at approx. 2m in height comes from reading the original Pegasus LVIA (dated January 2022) and personal verification when I visited the site on Tuesday 29th November 2022. The Pegasus LVIA included the following:

- images submitted with the LVIA referenced as '**Context Baseline Viewpoints'** 1, 2, 3, 4, 5, 6, 7, 11, 12 clearly show hedges at approx. 2m in height within the local landscape within and surrounding the site (excluding trees within them)
- under 2.3 Baseline Conditions, 'Woodlands, Hedgerows and Trees' paragraph 2.3.8 describes:

  'Field boundaries are generally delineated by ***well managed low hedgerows***[2]*, forming a strong field pattern'*

2.9 In the Rebuttal, 17 examples of hedges over 2m have been provided from Google Street View, however these have not been verified in the field. These hedges are all associated with highways, rather than agricultural fields. Many of these viewpoints show a dense lower hedge with seasonal growth on top. Other photos show

[1] My emphasis added in bold

[2] My emphasis added in bold

hedges containing trees, and this is not contested. Trees within field boundary hedges are accepted as part of the local landscape character.

2.10 The Rebuttal states that the maintenance of the hedges to an '*increased height*' was to '*alleviate potential significant visual effects'* created by the panels. However this increased height means the existing and proposed hedges would then be un-characteristic of the local landscape character.

2.11 The Layout and Landscape Strategy drawing P19-2022_10 shows that all the existing and proposed hedges on the site boundary and within the development are to be 'maintained' at 3m. The site covers 15 fields and measures 2.25km from north to south and 1km at its widest point, which is a significant linear metreage of hedges which would then not reflect the local landscape character.

2.12 The development proposes to maintain all hedges across the site at 3m in height, despite the Rebuttal stating that only 5 of the 15 viewpoints assessed in the LVIA rely on maintaining the hedges to a maximum of 3m. The viewpoint images included within the LVIA are taken of a single view in one direction. Those using PRoW roads etc. will not be limited to this one view as they move through the landscape.

3. The experience for recreational users of the public rights of way in close proximity to the site

3.1 The Environmental Enhancement Strategy was not reviewed as part of my response as it was/is not listed on the Melton BC Planning Portal under 22/00537/FUL.

3.2 Users of the network of PRoW are considered to be of the highest sensitivity to change brought about by development. The LVIA has assessed the significance of the visual effect on these users as Major significant adverse. It states the significance of visual effects are reduced to Moderate adverse (the LVIA terms this as not significant) after 15 years due to the increased height of the existing and proposed hedges which would be 'maintained at 3m'. Were the overall maximum height of the hedges to not exceed 3m then the hedges would need to be maintained at a much lower level to allow seasonal growth up to the 3m maximum. This would then in turn not reduce the identified Major significant adverse visual effects created by the 103.53 Ha of solar panels.

3.3 It is accepted that some of the PROW in close proximity to the site lie between existing and proposed hedges with up to 12m between these. However if the hedges are allowed to grow on to 3m, then the views of the wider landscape will be lost.

4. The cumulative impact of the Belvoir development in conjunction with other consented arrays in the wider landscape

4.1 The CEC Review highlighted that the additional Cumulative Assessment had looked at the potential cumulative effects on landscape character by looking at each separate 'character area' individually, rather than looking at the local landscape character within the 5km study area as a whole. This was why my email following the telephone discussion explained that it will be for Melton BC to make a judgement as to whether the consented solar farms in conjunction with the Belvior development create a landscape where solar farms become one of the defining characteristics of the Vale landscape, and whether this is acceptable.

Should you require any further clarification please do not hesitate to get in touch.

Yours sincerely

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Principal Landscape Architect

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