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Landscape and Urban Design Team
Planning Application Response

Date: 06 February 2025
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FINAL RESPONSE

Case Officer:	Ms. Zenab Hearn
Application reference:	23/03875/APP
Site:	BESS Rookery Farm Granborough Buckinghamshire MK18 3NJ
Proposal:	Development of a battery energy storage system (BESS), connected directly to the national Grid with associated infrastructure including access, drainage and landscaping.

Summary:

This response combines the issues raised in my Interim Response dated 21 February 2024, with subsequent findings, and so forms one complete and final response.

- At year 1, the proposal would have a **significant adverse impact on visual amenity** from a range of well used local public rights of way and viewpoints, including Conduit Hill in the Quainton Hills Area of Attractive Landscape. Whilst the proposed mitigation would go some way to reduce these visual impacts over time, the development is of such a scale that it would remain visible to those living in and/or moving through the surrounding landscape either on roads or the PRoW network.

- It would have a **significant adverse effect on landscape character at all scales** – Site, Local and Landscape Character Area. The introduction of large scale energy development into this strongly agricultural landscape would be significantly and permanently incongruous. The proposed mitigation does not in many cases, reflect the character of the wider landscape and the features in themselves would appear incongruous. This significantly lessens the benefits that they bring and their ability to compensate for the significant landscape character harm caused by the development.

- The **cumulative effects** of Rookery Farm BESS, Rosefield Solar/BESS, Tuckey Farm solar and East Claydon Substation would be significantly adverse. This would be in all scenarios - combined visual effect, combined sequential effects and combined landscape character effects. Together, these large scale energy developments would change the predominantly pastoral landscape to one entirely defined by energy development.

Discussion:

COMMENTS

VISUAL IMPACT

There is an underestimation of visual effects on a number of viewpoints. This is mainly due to:

- Underestimating the Magnitude of Change the proposal would have on many rural views.

The visual assessment underestimates the extent to which this large scale energy development would occupy the existing rural views. This lessens the conclusions of adverse effect. The Accurate Visual Representations at Appendix 5B are useful in considering and understanding this point.

- Overemphasizing the adverse visual effect of existing pylons on views of the rural landscape, which has lessened the conclusions of adverse effect.

Whilst pylons do have an adverse effect, the landscape remains strongly rural, confirmed by the Hogshaw Claylands LCA assessment.

- Overestimating benefit of green roofs to 37 inverter houses.

Whilst these may have some partial ecological benefit, I am not convinced this approach helps reduce visual impacts. The proposed large number of uniform features placed in a linear layout over an extensive area would be incongruous with the surrounding landscape.

- Overestimating the visual benefit of the proposed new planting.

The proposed planting would not provide screening for any negative features above and beyond the proposed development, so there is a neutral visual benefit.

- No consideration for long term hedgerow management requirements.

LEMP Table 1 describes managing hedgerow to 3-5m height. Whilst this may be useful in short term it is not enough to ensure health and robustness of hedgerow resource over minimum 40 year life of development. The government endorsed Hedgelink (https://hedgelink.org.uk/) provides hedgerow management best practice, which includes the cyclical requirement for coppicing and laying. These would both significantly open up views into site, a fact not considered in the assessment of visual effects.

Table 1 below summarises the receptors affected by the above discrepancies. Using the LVIA Methodology (LVIA Appendix 5.2), it gives a revised assessment, in my opinion, of the effect at Winter Year 1 and 10 (the worst case scenarios). The assessments take into account all proposed Mitigation.

The Significance Criteria and colour coding reflects that found in the LVIA (Tables 5.1 and 5.7 respectively).
RED = Major and Major/Moderate adverse effects (Significant and therefore Key Decision-making factors)
AMBER = Moderate adverse effect (Decision-making factors)

Table 1. Summary of disagreed visual effects

Visual Receptor	Year 1 (winter)	Year 10 (winter)	Comment
VP1 PRoW west of Granborough (GRA 10/1)	MAJOR (agreed)	MODERATE -MINOR (not Minor)	Affects large part of elevated view. Upper parts of substation remain permanently visible along with upper parts of containers seasonally visible. Future cyclical increase in views of containers resulting from hedgerow management requirements.
VPs 2 & 3 PRoW west of Granborough (GRA 2/2)	MODERATE – MODERATE/ MAJOR (not Moderate)	MINOR (not Neutral)	Affects large part of elevated rural view. Upper parts of substation remain permanently visible albeit filtered. Upper parts of containers seasonally visible but reducing over time. Future cyclical increase in views of containers resulting from hedgerow management requirements.
VP4 PRoW west of Granborough (GRA 1/1)	MODERATE-MAJOR (not Moderate)	MODERATE (not Minor)	Affects large part of close range rural view. Upper parts of substation remain permanently visible albeit filtered. Upper parts of containers seasonally visible but reducing over time. Future cyclical increase in views of containers resulting from hedgerow management requirements.
VPs 5 & 6 PRoW west of Granborough (GRA 2/ (adjacent northern site boundary)	MODERATE-MAJOR (agreed)	MODERATE (not Negligible)	Affects very close range rural view. Upper parts of substation remain permanently visible albeit filtered. Noises from substation and possibly containers, reducing tranquillity.

VP 7 PRoW east of East Claydon (ECL 4/2)	MAJOR (not Moderate)	MODERATE (not Neutral)	Affects large part of rural view. Upper parts of substation remain permanently visible along with upper parts of containers seasonally visible. Future cyclical increase in views of containers resulting from hedgerow management requirements.
VPs 8, 9 PRoW east of East Claydon (ECL 4/1)	MAJOR (not Moderate)	MODERATE (not Neutral)	Affects large part of elevated, rural view. Upper parts of substation and many containers remain permanently visible. Upper parts of other containers seasonally visible. Future cyclical increase in views of containers resulting from hedgerow management requirements.
VP 14 PRoW south of site (GRA 1/2	MINOR (not None)	NEUTRAL	Fig 5.12.14 shows tower visible in Field 2. Reasonable to assume upper parts of proposed substation would also be visible until tree planting establishes.
VP 17 PRoW adjacent to east site boundary (GRA 1/2)	MODERATE (agreed)	MINOR (not Neutral)	Future cyclical increase in views of containers resulting from hedgerow management requirements. Albeit short duration and not main focus of viewer.
VP 20 East Claydon Rd, north of site	MINOR/ NONE	MINOR/ NONE	If permitted solar energy development on Tuckey Farm is built out, that would block views of BESS.
VP 21 Conduit Hill (HOG 9/3)	MODERATE-MAJOR (not Moderate)	MINOR (agreed)	Development would occupy a notable part of the panoramic, largely rural view. Incongruous, repetitive, uniformity of containers over wide area. Planting in Field 4 would reduce impacts over time.

NB: The assessments of VPs 22 and 24 are not listed above as they are not disputed but are both ADVERSE and Decision Making Factors.

LANDSCAPE CHARACTER

There is an underestimation of effects on landscape character at several stages.

- Underestimation of effect on Site character.

The conclusion in Table 5.6 is incorrect. Following the LVIA Methodology (LVIA Appendix 5.2) a receptor with Medium sensitivity experiencing a High Magnitude of Change results in a Moderate-Major Adverse Effect (Significant), not Moderate. Furthermore, in my opinion the

Site's sensitivity is Medium-High rather than Medium, which would further raise the overall conclusion of Adverse Effect to the upper range of Major-Moderate/Major Effect (Significant).

The Site character is strongly representative of the wider landscape and the wider Hogshaw Claylands LCA 5.2. It reflects many Key Characteristics as well as Distinctive Features identified in the Aylesbury Vale Landscape Character Assessment 2008 (AVLCA), including the open, hedged fields of the prevailing agricultural land use. The development would result in the long term/permanent loss of Open Agricultural Fields and the Agricultural Land Use but that is not recognised in LVIA Table 5.6, making conclusion of adverse effect unreliable.

Whilst I agree that some of the proposed landscape enhancements will offer benefits to landscape character (hedgerow management, woodland and tree planting etc), I do not agree that the enhancements would outweigh the negative effect of introducing large scale electrical infrastructure into Fields 1, 2 and 3, as claimed in Table 5.6. I also question the appropriateness and benefit to landscape character of the large Orchard proposed in Field 4. Orchards are not characteristic of the wider landscape and one of this scale and location would be incongruous.

- No assessment of effect on Local landscape.

This refers to the landscape surrounding the Site but is not as wide an area as the LCA. It aids consideration for more local effects and is normally provided.

As with the Site character above, the Local landscape is strongly representative of the wider Hogshaw Claylands LCA 5.2. It reflects many Key Characteristics as well as Distinctive Features identified in the Aylesbury Vale Landscape Character Assessment 2008 (AVLCA), including the Open, Hedged Fields and the prevailing Agricultural Land Use. The development would result in the long term/permanent loss of these Key Characteristics. In my opinion the Local landscape has Medium-Medium/High sensitivity and the development would cause a Medium-High Magnitude of Change. The effect would be in the lower end of the range between Moderate/Major-Major Adverse Effect on Local landscape character.

- Underestimation of adverse effects on the strongly agricultural landscape of LCA 5.2 Hogshaw Claylands

The assessment of effect on Hogshaw Claylands LCA in Table 5.6 is incorrect. Following the LVIA Methodology (Appendix 5.2) a receptor with Medium sensitivity experiencing a High Magnitude of Change results in a Moderate-Major Adverse Effect (Significant), not Moderate. Furthermore, the assessment is very limited and incorrectly focuses on visual effects rather than effects on Key Characteristic features of the LCA, such as the long term/permanent loss of Open Fields, the loss of Agricultural Land Use plus the extension of electrical infrastructure from adjacent Claydon Valley LCA in north into the Hogshaw Claylands LCA. The mitigation proposals do provide some landscape benefits, but these do not outweigh negative effects as much as suggested (see Mitigation below).

- No consideration of reduction in Tranquillity through noise emitted from substation, containers and inverters

It would be usual for an LVIA to include some consideration for Tranquillity but none has been included. As the existing landscape is strongly agricultural and relatively peaceful, it would be reasonable to consider the impact of introducing a large number of battery containers, inverters and the substation, which all emit various levels of noise.

The table below summarises the receptors affected by the above discrepancies. Using the LVIA Methodology (LVIA Appendix 5.2), it gives a revised assessment, in my opinion, of the effect at Winter Year 1 and 10 (the worst case scenarios). The assessments take into account all proposed Mitigation.

Table 2. Summary of disagreed landscape character effects

Landscape Receptor	Year 1	Year 10	Comment
Site	MAJOR-MODERATE/ MAJOR (not Moderate)	MODERATE (not Minor)	The adverse effect at Year 1 would be at the upper end of this range. The landscape benefits provided through the Mitigation are limited. Some are incongruous and therefore harmful. Some loss of Tranquillity through noise. Loss of Key Characteristics.
Local Landscape	MODERATE/ MAJOR – MAJOR (LVIA provides no assessment for comparison)	MODERATE -MAJOR ADVERSE	The adverse effect at Year 1 would be at the lower end of this range but still significant. The landscape benefits provided through the Mitigation are limited. Some are incongruous and therefore harmful. Some loss of Tranquillity through noise. Loss of Key Characteristics.
LCA 5.2 Hogshaw Claylands	MODERATE-MAJOR (not Moderate adverse)	MODERATE ADVERSE (not Moderate beneficial)	Hogshaw Claylands LCA is relatively small, and the development affects a notable part of it. Key Characteristics are lost. The landscape benefits provided through the Mitigation are limited. Some are incongruous and therefore harmful. Some loss of Tranquillity through noise. Loss of Key Characteristics.

MITIGATION

In theory the proposed mitigating planting does provide some useful enhancements to landscape character. However, some features are uncharacteristic to the Hogshaw Claylands LCA and do not benefit the landscape. These include the:

- Orchard

This is an extensive feature, proposed in Field 4. Orchards are not a characteristic feature of the local landscape or wider LCA. Furthermore, although some passive public access would be possible at some times of the year (a proposed recreational footpath runs nearby), it is too remote and inaccessible to local communities to be managed as a useful food resource. Overall, in landscape character terms, the orchard is more of a disbenefit than benefit.

- Woodland planting

Although woodland planting is positive in principle and meets one of the Landscape Guidelines for Hogshaw Claylands LCA 5.2, the proposed layout and relationship to other features is uncharacteristic to the area. Planting Plans 1 & 2 show seven new woodlands. W3, 4 & 5 are uncharacteristically lozenge shaped areas, separated from existing field boundaries by grassland. W6 & 7 are oddly linear areas alongside a hedgerow. These woodland locations and layouts are incongruous with the local landscape character and wider LCA, and this significantly reduces their benefit.

- Tree planting

Tree planting is also a positive feature in principle but the linear planting alongside hedgerows is uncharacteristic and in some locations, it is very formally spaced which is wholly incongruous. This approach significantly reduces the benefit of the tree planting in landscape terms.

- Large waterbodies

The creation or enhancement of ponds is a Landscape Guideline for Hogshaw Claylands LCA 5.2. However, the proposed waterbodies 'NP3 & 4' are much larger than any agricultural ponds might be and are incongruous as a result. The wildlife ponds in Field 4 works better in terms of landscape character.

The uncharacteristic nature of these features significantly limits their benefit and arguably cause harm. An aerial photo search around the wider LCA reveals how features such as woodland, tree planting and ponds might be incorporated more appropriately to the Hogshaw Claylands LCA and better reflect the relevant Landscape Guidelines.

- Opportunities for increased PRoW Connectivity have not been wholly realised

Some new permissive footpaths are proposed within the site, which connect with existing PRoW. However, an additional link at the site's northern corner through to ECL 4/2 would provide a, additional circular route for both Granborough and East Claydon residents. A link from the site's Field 4 to the North Buckinghamshire Way Long Distance Trail HOG 6/1 would also provide a circular route from walkers from East Claydon. Whilst these issues are covered in more detail by our Strategic Access team, enhancements to recreational features are also considered a potential landscape benefit, which can help balance against landscape harms elsewhere.

CUMULATIVE EFFECTS

The submitted cumulative assessment (LVIA para. 5) is confused and unhelpful.

When considering the effects on landscape character it refers to views and screening when it should be considering what key characteristics of the existing landscape would be affected. There is no consistency on which existing and proposed developments are being considered at each stage. When considering visual effects it lacks clarity on which visual receptors are being discussed or why some developments are intermittently included and excluded.

In my opinion, the four developments relevant to this assessment are Rookery Farm BESS, the existing East Claydon Substation, permitted Tuckey Farm Solar and the proposed Rosefield solar/BESS DCO. Whilst the Wings Farm solar development has reached Scoping Opinion stage, I am unaware of any further proposal and so there is not enough certainty that it will

proceed to include it at this stage. Given the large scale and geographical concentration of the four developments, it is most appropriate to consider their effects taken together (rather than the *additional* effect of the proposal) as that is how most stakeholders would experience them.

The **Combined Cumulative Visual Effect** (when several developments are seen from one viewpoint) would be most keenly felt from receptors in and around:

- Conduit Hill area in the Quainton Hills AAL to the south (eg. VP 21) where all four developments would be visible to varying degrees
- Granborough village area to the east (eg. VP 1) where all four developments would be visible to varying degrees
- East Claydon village area to the west (eg. VP 22, 23) where all four developments would be visible to varying degrees

Although the extent of each development that was visible may vary, the perception of incongruous, large scale energy development across the valley floor would be evident. This would be in stark contrast to the current appreciation of a predominantly rural landscape in which there are some detractors from electrical development. In my opinion the adverse effect would be significant.

The **Sequential Cumulative Visual Effects** (where several developments are seen sequentially when moving through the landscape) would be most keenly felt from receptors along the following routes:

- PRoW east-west between East Claydon and Granbrough villages (ECL 4/1, ECL 4/2, GRA 2/2), where users would see, or be travelling through, Rookery Farm BESS, East Claydon Substation and Rosefield Solar/BESS
- PRoW north-south between Tuckey Farm/Winslow area and Quainton Hills AAL inc. Conduit Hill (WIS 1/1, WIS 1/2, GRA 1/1, GRA 1/2, HOG 1/1)
- Local roads including Hogshaw Road to the east and south and East Claydon Road to the north

Along these routes parts of all four developments would come in and out of view at various points. Although not all of each development would be visible, it would be enough for footpath and road users to be acutely aware of the amount of energy development in the landscape around them. This would be in stark contrast to the current experience of moving through a predominantly rural landscape in which there are some detractors from electrical development. In my opinion the adverse effect would be significant.

The **Combined Cumulative Landscape Effects** on landscape character (where developments impact on the physical fabric or character of the landscape) of the four developments taken together would most influence the 5.0 Shallow Valleys Landscape Character Type, which includes the 5.6 Claydon Valley and 5.7 Hogshaw Claylands Landscape Character Areas, all described in the AVDC Landscape Character Assessment

The combined cumulative effect of the four developments would have a significantly adverse effect on the 'predominantly pastoral landscape' of the Shallow Valleys LCT through the reduction and/or loss of Key Characteristics, such as the predominantly pastural Land Use; medium sized Fields; lack of settlement; and the sense of Remoteness and Tranquillity away from roads.

Furthermore, the AVDC LCA identifies that the Shallow Valleys LCT has 'fine examples' of ridge and furrow, particularly around Granborough, as a distinctive feature of the area. Whilst none are within the Rookery Farm BESS site itself, large areas of ridge and furrow would be lost beneath the developments taken together. Arguably, one development inevitably leads to justification for another, particularly with energy development, which is often clustered around substations, and so there is a shared responsibility for the wider loss of this important and valued landscape feature of the LCT.

The loss of these key characteristics would have a significantly adverse effect on the Shallow Valleys LCT as a whole, and individually the Hogshaw Claylands and Claydon Valley LCAs.