

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.

15th May 2024

STATERA ENERGY RESPONSE TO LANDSCAPE OFFICER COMMENTS DATED 7th MAY 2024

Overview:

Thank you for providing the comments from the Landscape Officer dated 7th May 2024. Whilst we are open to appropriate approaches to resolve concerns, there are comments made concerning visual amenity, landscape character and cumulative effects which our landscape consultant fundamentally disagrees with. The purpose of this response note is to proactively and positively address the comments made, identifying areas where potential resolution can be reached alongside fundamentals not agreed.

Visual Impact

1. We maintain position that, in summer, the proposed electrical infrastructure within the BESS compounds will be sufficiently screened by the existing tree and hedge cover that the visual effects will not be Significant under the criteria of the ES. Additional photomontages will be made available to illustrate this point.
2. Impacts on visual amenity in Winter Year 1 for a few views will be Major adverse or Moderate – Major adverse and thus Significant. We maintain position that impacts will decline to acceptable levels as proposed mitigation establishes. We do not accept comment that the magnitude of change is underestimated. Change and assessment needs to be viewed in the context of the existing electrical infrastructure (large substation and overhead lines) which form part of, and are dominant locally within, the landscape.
3. Regarding the view from Conduit Hill, this is an extensive panorama of such distance that it is difficult to even make out the existing substation, let alone the application site. It cannot be the case that the few visitors to the hill will be so offended by the view of the distant proposed electrical infrastructure that the scheme should not be consented. The visual effect cannot be considered Significant under the terms of the ES.
4. On hedgerow coppicing, the landscape officer seeks to increase level of impact by assuming that hedges should be periodically coppiced and laid in accordance with the Hedgelink website, thereby opening up views of the electrical infrastructure. While there might be some benefits in periodically coppicing and laying hedges, it is far from common practice in the Hogshaw Claylands and the majority of the UK. The hedges around the Site are substantial and in good condition and have been managed year after year in the same way, without the need for coppicing and laying. Nevertheless, if considered necessary, such an approach can be incorporated into the LEMP. If the first cycle occurs fifteen years after installation of the facility,

then the proposed planting behind the hedges will have established sufficiently to provide a backup layer screening. A coppiced hedge can typically achieve three metres height within three years after coppicing and so the period of reduced screening will be short. To ensure continuous effective screening we propose to incorporate a new hedge five meters in from the existing hedges (the gap will allow management of the two hedges and the ditches). The new hedge will act as an effective screen while the existing hedge is being coppiced and it, in turn, can be coppiced on an alternate cycle, say 20 years after planting. This will be illustrated within updated documents.

5. The landscape officer considers that the biodiverse roofs will have a limited effect at reducing visual impact and so we are proposing to omit these and propose painting the inverter buildings using a pallet of five recessive green shades. Only one shade will be used per building but by painting buildings different shades a visually disruptive camouflage pattern can be created across the whole Site.

Landscape Character

6. The existing landscape character context is rural and strongly influenced by electrical infrastructure, we maintain that the proposed development will be in keeping with this character. Features within a landscape which confer character can be both positive and negative in how they are perceived. In our opinion the perceived change will not be 'Significant'. A significant adverse effect should be reserved for more pristine rural landscapes. Given the influence of the existing substation and multiple overhead lines it is preferable to locate the proposed infrastructure at this location rather than in more pristine landscapes. We maintain our position that the sensitivity of the Site should be considered to be Medium, not Medium - High.
7. We maintain our position that proposed mitigation will integrate the Proposed Development into the landscape to such a degree that it will not have a Significant cumulative effect with the existing electrical infrastructure.
8. The landscape officer considers that the proposed orchard, woodland planting and water bodies would be out of character with the existing landscape. The orchard was a feature introduced by Future Nature, the BBOWT commercial consultancy, primarily to provide a valuable habitat type. We will, however, omit this since it is considered inappropriate. We have aimed to provide larger and less fragmented woodland blocks, but the area available is determined by numerous constraints, including:
 - The required 25m off set from the Proposed Development as set out by Planning Policy NE8.
 - A required offset from the overhead transmission lines.
 - A required offset from the main watercourse (a drainage board requirement).
 - An offset from the hedges to enable maintenance access to both the hedges and the ditches at their base.
9. Despite this, small woodland blocks of a variety of sizes are a feature of the local landscape and we do not accept that the proposed blocks are out of keeping. Particularly because the majority of views towards the Proposed Development will be at a similar level or only from a slightly elevated viewpoint to the viewer. As a result, tree, woodland and hedge planting will appear as a

solid mass, and that the majority of the Site will appear as one woodland block, as demonstrated by our photomontages.

10. We maintain our position that the mosaic of woodland, scrub, hedgerow and grassland provided maximises the biodiversity potential of the land, to a far higher degree than simple, larger woodland blocks.
11. The landscape officer considers that water bodies proposed are far larger than agricultural ponds and so will be incongruous. The ponds are designed to attenuate storm water runoff from the Proposed Development and so are sized to meet that functional drainage requirement. As such, they comply with policy and meet best practice. While they are shown on plan as large water bodies, they will in practice be shallow, damp grassy basins and will only fill with water during times of high rainfall. Such periodic seasonal flooding is characteristic of the LCA. The shallow basins can include smaller areas which are excavated deeper so that they provide more permanent small-scale ponds, in keeping with the LCA. We therefore disagree that proposed ponds are incongruous, and we maintain our position that these are in keeping with the LCA whilst meeting drainage requirements.
12. The landscape officer states that tree planting along hedgerows is uncharacteristic, this is not agreed. Mature hedgerow trees are a defining feature of the hedgerows around the Site. Our BNG calculations encourage enhancement of hedges by planting hedgerow trees and landscape officers have welcomed and encouraged more hedgerow tree planting on our other projects across the country. Such planting does not seek to preserve the character of landscapes which are degraded in terms of their habitat structure but to enrich them. Planting will be of mixed species which are not evenly spaced. The hedgerow trees are a form of advanced planting and there is usually woodland planting close to them. Once all planting has established, the Site will appear as a block of woodland to most viewers in the surrounding landscape and will appear characteristic of woodland within the Hogshaw Claylands.
13. Concerning officer comments on tranquillity, a noise assessment was completed as part of the Environmental Statement, comments on this were provided by the Environmental Health team at Buckinghamshire and no objection was raised.

PRow Connectivity

14. We appreciate that extending the permissive path through the hedge in the northern corner would provide a better walking route and increase connectivity, however the landownership boundary extends down the centreline of the hedge and so the ability to make the connection is not within the Applicant's control. An alternative link has been provided, heading southeast.

Cumulative effects

15. The Rosefield Solar project is a Nationally Significant Infrastructure Project (NSIP) which has yet to confirm information through either an application or statutory consultation. There has been to date no detailed information provided on which to consider the Rosefield project in terms of landscape or visual effects. As such we fundamentally disagree that the Rosefield Solar Farm proposals should be given weight, let alone substantial, under cumulative effects. Doing so would be contrary to established practice to consider projects which are sufficiently detailed,

having been either granted consent or where planning application has been applied for, when assessing cumulative effects. Basing cumulative effect assessment on a scheme which is at such an early stage is a flawed approach and potentially open to future legal challenge given the lack of available information for that project.

16. The existing East Claydon Substation forms the baseline context for the site and the approved Tuckey Farm Solar project forms an appropriate cumulative consideration. We will prepare photomontages from Quainton Hill, Granborough and the slopes south of East Claydon to illustrate the potential cumulative effect of these proposals. However, it remains our position that once the landscape mitigation has established, the Proposed Development will be largely screened by trees and hedges in summer and will appear as a block of woodland within the landscape. In winter, it will only be possible to glimpse the batteries and inverter houses through bare branches and only from close viewpoints. Therefore, we maintain our conclusion that the proposed electrical equipment will not have a significant cumulative effect.

Summary

17. We maintain that mitigation proposed will reduce visual impact to an acceptable, less than significant level, within an acceptable timeframe.
18. We will adjust planting and LEMP to allow coppicing and layering of the existing hedges without loss of screening.
19. We will omit the biodiverse roofs and adopt a painting palette to visually break up appearance of the inverter buildings.
20. We maintain that once the mitigation has established, the Site will appear as a single block of woodland to most viewpoints and so will be in keeping with the woodland blocks within the Hogshaw Claylands LCA. Since the equipment within the BESS compounds will be screened, then the perceived adverse effect of increased electrical infrastructure within the Hogshaw Claylands will be limited to the visible elements of the proposed substation. This also means that the cumulative effect of the Proposed Development with other potential electrical infrastructure schemes within the vicinity will be limited.
21. We will produce a set of photomontages for summer views and a set showing potential cumulative effects excluding Rosefield Solar Farm (as confirmed above).
22. On our other schemes we have had positive engagement with landscape officers who recognise the need for the upgrading of the electrical grid near major substations and have worked with us to deliver the infrastructure while achieving the best possible outcome for the landscape and visual amenity. We wish to engage in a similar process to achieve a revised scheme which addresses the concerns raised. We look forward to working together with the landscape officer to proactively resolve matters as may be possible before planning determination.