APPEAL BY JBM SOLAR PROJECTS 6 LTD COTMOOR SOLAR FARM, LAND NORTH OF HALLOUGHTON, SOUTHWELL

BRIEF REPLY TO THE COUNCIL'S CLOSING SUBMISSIONS

The purpose of this document is not to respond to every point in dispute - in most instances, the areas of disagreement are clear, and the Inspector has a careful note of the evidence.

Paragraph	Reply
Number	
6	The reduction in effect over ten years is not a change in position. It was not
	until the ES that the long-term effects on landscape character were
	considered and recorded. It is wholly unsurprising given the level of
	mitigation that is proposed that the magnitude of change would reduce over
	time, and the contribution of the new planting to landscape character would
	increase. Such is the case with almost all built development where planting
	matures and reduces the perceived landscape as well as visual effects.
9(1)	The original LVIA assessed Rev H of the site Layout and Planting Proposals
	as set out in the Landscape and Visual ES chapter at §2.1.7. The addendum
	then assessed Rev J. Early proposals proposed only 20 new trees in the
	hedgerows, and so the change is far more significant than +8.
17	The submissions do not record the disagreement between Ms Gillespie, and
	Ms Whitfield who accepts that the new and enhanced planting is in fact a
	benefit of the scheme. She does not adopt the argument that new planting
	will give rise to landscape or heritage harm, and it has not featured in her
	planning baalnce as confirmed in cross examination.
24	The suggestion that the prebend, which is a matter of historic record, not
	tangible, and no longer in existence "contributes to a large extent to the
	heritage interest" of the named assets is not plausible. That is not in any
	event Mr Partington's evidence since he agrees that most of heritage
	significance of all these assets lies in their built form and physical fabric.
	The relationship with, and nature of the historic prebend will not change as
	a result of the proposed development.
40	Mr Burrell explicitly refers to Mr Cook's evidence in his planning Proof. To
	suggest that he has read, but has failed to understand it, is a nonsense. It
	should also be remembered that Ms Gillespie abandoned her case on Policy
	Zone 39, considering that there would only be a minor scale of effect on that
	landscape character area within the site.

APP/B3030/W/21/3279533 Thea Osmund-Smith No5 Chambers