

LANDSCAPE AND VISUAL IMPACT APPRAISAL:
KELHAM SOLAR FARM AND BESS

-

Addendum



PREPARED BY



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Assured Asset 2 Ltd

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Plan	Title
HC1002/02/05 Rev 1	Landscape Mitigation Masterplan
HC1002/02/09	Zone of Theoretical Visibility (Including Visual Barriers)
Viewpoint 4 Rev 1	Phomontage
Viewpoint 5 Rev 1	Phomontage
Viewpoint 7 Rev 1	Composite View
HC1002/05/27 rev1	Public Access Details

Appendix	Title
A	Technical Methodology: Photography, 3D Modelling and Verified Visualisations, Kelham Solar Farm, August 2023

1. INTRODUCTION

1.1.1 This landscape and visual impact assessment addendum has been produced in response to comments made on behalf of Newark and Sherwood Council by Influence Landscape Planning and Design Limited dated March 2024 (referred to as 'Landscape Review'. The addendum focusses on:

- Site design and structural landscape mitigation proposals
- Recreational Value of the site
- Impacts of the BESS – landscape and visual
- Construction phase visual effects
- Comments on the photomontages

1.1.2 The 'Landscape Review' made the following recommendations, summarised as:

- *Review low value rating for recreational value of the site and its immediate surroundings - See Section 3*
- *Impacts of the BESS should be more fully considered - See Section 4*
- *Include construction effects for visual receptors - See Section 5*

1.1.3 The 'Landscape Review' also made secondary recommendations, summarised as follows:

- *Consider AVR4 montages where appropriate - See Section 7*
- *Photomontage for VP07 of the additional viewpoints, with greater description of the change in the nature of the view, as would be experienced, due to the proposals - See Section 10*
- *Create a structural landscape buffer along the southern edge of the site to the BESS and at the pond edge next to Kelham Conservation Area - See Section 2*
- *Ensure that all PRoW, (including Permissive routes) through the site have a minimum 10m buffer either side to the solar panels/hedgerow/BESS; - See Section 2*

2. SITE DESIGN AND STRUCTURAL LANDSCAPE MITIGATION PROPOSAL UPDATES

2.1.1 The following comments are taken from the 'Landscape Review' and addressed as follows:

2.8. It is proposed that in mitigation, there is 'suitable standoff from the proposed layout of solar panels so that this route will be physically unaffected by the proposed solar farm'. It does not specify the amount of standoff to the PRoW route and permissive routes at the site.

2.1.2 The site mitigation proposals have been amended, including; additional areas of planting, fence lines moved and appropriate buffers added to public and permissive rights of way. See the following discussion and updated drawing: **HC1002/02/05 Rev 1, Kelham Solar farm, Landscape Mitigation Masterplan.**

2.1.3 'Landscape Review' comment:

2.13. The retention of existing field boundary vegetation at the site is defined as an integral part of the proposed development. With reference to the Landscape Masterplan, the red line boundary lies inside of key vegetated field boundaries of the site and therefore not within the control of the applicant. The LVIA describes how all boundary hedgerows are to be maintained at 3m+ 'where appropriate'. Presumably this pertains to newly planted boundary hedgerow within the site, as there is normally no control of hedgerow outside of a site boundary. On the landscape mitigation plan there is very little hedgerow planting to the site, with the exception of proposed hedgerow to the south eastern boundary where the site is close to the A617 and also to the western edge of the site, adjacent to the BESS.

Hedgerow at field boundaries of the site are generally maintained lower than 3m and this proposed mitigation departs from this local characteristic.

- 2.1.4 All hedgerows bordering (and forming) the site red line are under the control of the applicant, the 'blue line' ownership boundary has now been added to the landscape masterplan. The hedgerows will be managed as discussed in the assessment. A significant number of additional hedgerows and woodland blocks have now been added to the site design, see the following section and See Drawing: **HC1002/02/05 Rev 1, Kelham Solar farm, Landscape Mitigation Masterplan.**

2.14. Mitigation proposals for the BESS compound is described as a replacement hedgerow 'to help screen' the compound from the surrounding farmland, and the landscape mitigation plan also provides for earth bunding between the hedgerow and BESS compound.

- 2.1.5 A significant number of additional hedgerows and woodland blocks have now been added to the site design, notably around the BESS and substation area as the permissive route no longer passes along this boundary of the site. This planting, including standard sized trees, will grow taller than the 4m tall infrastructure to screen the site features. See the following section and see Drawing: **HC1002/02/05 Rev 1, Kelham Solar farm, Landscape Mitigation Masterplan**

2.16. Greater mitigation could be provided for these Conservation Areas. Firstly, by extending screening planting next to the pond and secondly, by providing some screening planting to the south eastern boundary facing Averham. This mitigation planting should also take account of permissive routes and standoffs as outlined below.

- 2.1.6 An additional woodland and scrub block has been added in the area around the pond, and the site layout amended, although it was considered that the original views would be screened, this planting will form a further buffer. Additional planting around the BESS previously discussed.

2.17. Proposed permissive routes lie within the corridor between boundary vegetation and the security fence, and although difficult to ascertain from the landscape mitigation plan submitted it seems that the proposed perimeter solar fencing does not reach a 4m minimum width for the recreational user at parts of the route. Particularly at the wooded boundary to Kelham Country House, to the west of the BESS and at the northern corner of the site. Admittedly some of these locations are extensions to the existing permissive path route, and are proposed to form an unbroken circular route around the whole of the site.

2.18. Similarly for PROW routes at the eastern edges of the site, there is a tight corridor between boundary vegetation and the proposed security fencing. PROW corridors should be 10m wide on either side of the PROW route.

- 2.1.7 The separation distance has been increased around the whole site and in majority of places this allows for a c.10m wide buffer corridor for the permissive path sections. A new permissive path section has been added across the southern area of the site, utilising a new access track, to avoid the unnecessary 'loop' around the southern BESS area, see drawing HC1002/05/27 rev1 Public Access Details. In many areas the site fence line has been moved tighter to the solar deployment allowing a wide buffer zone. It is noted that the central PROW maintains a buffer that is in excess of 10m either side of the route. It is again noted that the boundary hedgerows are the responsibility of the applicant and these will be side cut to maintain wide access corridors around the perimeter whilst allowing upper sections to grow for screening purposes.

2.31. The layout extends the solar panels to the limits of the red line areas in the main. There appears to be opportunities for a more considered landscape approach to mitigation.

- 2.1.8 The site mitigation proposals have been reinforced, fence lines amended, and appropriate buffers

added to public and permissive rights of way. See the following discussion. See Drawing: **HC1002/02/05 Rev 4, Kelham Solar farm, Landscape Mitigation Masterplan.**

2.1.9 In summary the mitigation features updated include:

- Provision of an additional Hedgerow and hedge trees along the northern side of the existing public footpath that passes through the northern area of the site (NT Kelham Footpath 4), a length of c.900m
- Widening of the perimeter buffer corridors from c.4m to c.10m upon the alignment of the permissive footpath. Note this route was originally part of a HLS agreement but this is no longer applicable, although the landowner allows access to remain.
- Realignment of the permissive route that previously was diverted around the southern boundary and BESS / substation area. The route now reverts closely back to the original route that was subject to the HLS agreement. The route is shortened whilst still allowing access to the road corridor to the south, an improvement in accessibility over the baseline situation.
- Enhanced screening mitigation planting to be provided upon the boundary of the BESS / Substation, an area of c.1,800m², due to the realignment of the permissive route.
- Additional woodland / scrub planting upon the boundary of Kelham Conservation Area, close to the pond, an area of c.1000m².
- The translocation of the existing semi mature hedgerow that fronts the A617 by the new site entrance, a length of c.117m. This will help to aid screening from the initial stages of construction. The hedgerow will be interplanted with further hedgerow plants to infill any gaps.
- Interplanting of gaps within the existing hedgerow beside the A617 along the whole section that extends north from the site boundary towards Kelham.

2.1.10 The following table outlines the changes in areas and quantities between the submitted scheme and the revised scheme submitted with this Addendum. Highlighted boxes shown where there has been a net increase (improvement) following the updated design.

Table 1: Mitigation, Area and Quantity Updates

Kelham Solar Farm Design and Mitigation Element	Original Scheme HC1002/02/05, Kelham Solar Farm, Landscape Mitigation Masterplan	Revised Scheme HC1002/02/05 Rev 1, Kelham Solar Farm, Landscape Mitigation Masterplan
Tussock Grassland with solar deployment zones security fencing	c.582,283m ² (58.23 ha.)	c.546,317m ² (54.63 ha.)
Meadow Grassland within site boundary, but outside of security fencing, set aside for landscape / biodiversity benefit. (Note: existing retained hard standings to be subtracted from this overall figure)	c.56,032m ² . (5.60 ha.)	c.89,116m ² (8.91 ha.)
Total length of Permissive routes within the site red	c.4,250m	c.3,670m

line boundary, within meadow grassland zone.		
Proposed Hedgerows (new) Infill areas to be subject to separate detailed site survey.	c.734 l/m. c.52 no. native hedge trees	c.1578 l/m. c.60 no. native hedge trees
Translocated Hedgerow	-	117m
Proposed Woodland / Scrub	c.6659m2	c.9343m2
Proposed Bunds (Note part covered by woodland this figure is deducted from meadow grassland area)	c.7,478m2	c.7,478m2
Length of existing hedgerows around and within site (retained and protected)	c.3.6 km	c.4.33km (now includes A617 hedgerow)
Total area of gravel tracks	c.53,416m2, length: 13,354m	c.65,036m2, length: 16,259m
Areas of BESS Compound	c.7,818m2	c.7,297m2 (ex. firewater tanks)

2.1.11 The revised mitigation treatments and existing features are shown on the proposed Landscape Mitigation Masterplan Drawing: **HC1002/02/05 Rev 1, Kelham Solar farm, Landscape Mitigation Masterplan.**

2.1.12 Overall, the revised mitigation and enhancement proposals seek to reduce the landscape effects of the solar farm and integrate it within the local arable landscape, whilst seeking to screen and filter the development from the view of receptors within the site and wider area. It is also noted that the solar farm will allow enhanced public access upon retained and extended permissive routes.

3. RECREATIONAL VALUE OF THE SITE

3.1.1 The following comments are taken from the 'Landscape Review' and addressed as follows:

2.6. There is an overall judgement of 'low' recreational value of the site and immediate area...

2.7. It is considered that, the LVIA report downplays the importance of the site for recreational amenity as the PROW within the site and adjacent Trent Valley Way, running next to the south eastern boundary of the site, and the extensive network of permissive paths at the site, are well used by recreational users. The current permissive route at the site links to PROW within the site and is setback from the busy A617. The permissive route was part of Higher Level Stewardship funding and then linked to the Trent Valley Way, now re-routed along the A617. Part of this funding also allowed for species rich grass margins to the arable fields.

3.1.2 The site contains one main PROW with a link into a second route, which appears of very limited use. There is a permissive circular route that connects with the PROW to form a loop from Kelham, connecting into Broadgate Lane. The permissive route does not connect with the A617 or the Trent Valley Way. It is noted that the Trent Valley Way does not pass through the site, but rerouted upon the pavement bordering the site, beside the busy A617 corridor. There are no direct physical effects upon this regional trial upon what is a chaotic section of the route due to nearby traffic (HGV) movements. The internal permissive routes were part of a historic HLS agreement that is no longer

current however the landowner continues to allow permissive access. This access will be enhanced in accordance with the site layout, both extending the length of routes around the whole site and connecting to the regional trail, whilst also passing through wider protected wildflower fringe corridors. Considering the site currently only hosts one PROW (with an adjoining link section) and loop of permissive access, it is considered that overall, the assessment conclusion on the recreational value of the site is fair.

2.8. In the Landscape Value Summary within the LVIA, the landscape value of the site and immediate area is assessed as 'medium' and overall I am in agreement with this rating.

- 3.1.3 Comment is noted regarding overall conclusion, which includes the recreational element.

4. IMPACTS OF THE BESS – LANDSCAPE AND VISUAL

- 4.1.1 The following comments are taken from the 'Landscape Review' and addressed as follows:

2.2. The LVIA follows a very clear methodology. One important element to note is that the ZTV has been run to a height of 2m to allow for the solar panels and measured from points within the site excluding the BESS compound, and the associated heights of the attached BESS. The BESS compound is described as comprising of battery clusters at 3,2m high, two transformers – with typical height of 3m, 3m high concrete firewalls, DNO substations x 2 (not sure at what height), and a 4m acoustic fence to the east of the DNO, at ground level circa 13 AOD, a higher part of the site.

2.20. Impacts of the BESS are mainly excluded in descriptions within the report, there is very little description of the effects of the BESS compound at the site upon landscape and visual receptors, apart from some description under Table 6. Descriptions of effects are mainly limited to the solar arrays at 2m height only and not that of the BESS compound.

- 4.1.2 With regard to the BESS effects on visual receptors, these are only discussed if it is considered that there may be views to the BESS elements. Where there is no comment on the BESS, there are no views, however scheme is considered 'as a whole' solar and BESS combined.

- 4.1.3 An additional ZTV is supplied, **Drawing HC1002/02/09, Kelham Solar Farm, Solar and BESS – Zone of Theoretical Visibility (Including Visual Barriers)**. This drawing illustrates visibility to the Solar deployment zone only, the BESS only and combined visibility to both. As illustrated, there are geographical areas to the north of the site that would only have theoretical visibility to the solar deployment zone and areas to the south generally have combined visibility to both elements. There is only a very small area with theoretical visibility to the BESS only, in reality there would be no views from this distance. As stated in the main assessment text, the ZTV in this topographical context illustrates a significantly larger zone of visual influence than experienced, as no account is taken of the numerous mature hedges in the area.

- 4.1.4 Viewpoint 5 assessment specifically discusses the BESS, this is reviewed within Section 6 of this addendum, the assessment stated; "on site assessment and review of the photomontage confirms there are views towards the southern deployment area and BESS. The BESS compound is seen partially clipped by the woodland block on the far side of the site. Due to the unchanging topography the view is restricted to the eastern edges of the rows of arrays which screens a large proportion of the deployment behind. The lighter side of the arrays appear less prominent than the front side as seen in viewpoint 4. Whilst, the taller BESS enclosure is clearly noticeable, seen breaking the skyline, at this distance it does not dominate the view." The visual assessment and conclusions relating to the BESS are considered appropriate, however 3 updated viewpoints are considered, see Section 6.

- 4.1.5 With regard the landscape effects the scheme is considered as 'a whole' within the assessment. When

effects are stated, these are considering the whole development, even if the BESS element is not specifically stated. The BESS is considered as a portion of the Kelham proposal, should landscape effects as a result of the BESS be different, these would have been stated in the text.

5. CONSTRUCTION PHASE VISUAL EFFECTS

5.1.1 The following comments are taken from the 'Landscape Review' and addressed as follows:

2.26. the LVIA does not recognise any visual effects during the construction phase for sensitive visual receptors (section 8.1.2). This is due to 'vehicles accessing the site and on the proposed internal access tracks will be visible but from most situations away from the site boundaries and internal PRow these movements will be difficult to discern'. I do not feel that this section fully describes all aspects of construction of the proposals for local sensitive receptors, which are expounded more fully in an earlier section (6.6.3) of the LVIA.

5.1.2 Section 4.1.1 of the LVIA considers construction phase effects and overall, these are not considered to be a substantial issue. All residences are set away from the site access upon the A617, there will be no construction access from Broadgate Lane. It is noted that the screening bund close to Broadgate Lane will be one of the first construction activities and the site compound set close to the site entrance and BESS area, away from sensitive receptors. Views of construction activities for residents would be limited to the few properties directly opposite the north eastern boundary and the PRow access on Broadgate Lane. The assessment also confirms that visibility into the site at ground level is partly restricted by the roadside hedgerow forming the northern site boundary which will limit the proportion of the site shown to be theoretically visible. The temporary visual effects from the construction phase are considered to be 'not substantial' from all receptors excluding the internal PRow.

5.1.3 Users of the PRow moving through the site would be very aware of construction activities although these will be for a short-term duration, transient and focussed to different areas of the site. The high magnitude of visual effect from the PRow is unavoidable at this location given the footpath route is an internal one with the mitigation proposed to be planted at the time of construction, enhancing overall landscape structure but with the primary function of further screening views for external visual receptors over time.

2.11. The overall summary assessment of the landscape of the site and surrounding area is assessed as 'medium', it is aligned with the published landscape character descriptions and sensitivities and also aligns with our own professional judgements.

5.1.4 The overall conclusion on the baseline assessment of the site is noted.

6. PHOTOMONTAGES

6.1.1 The following comments are taken from the 'Landscape Review' and addressed as follows:

2.24. A photomontage of the site would have been beneficial for Viewpoint 07, as was provided for Viewpoint 05, as this is where the tallest elements of the site are situated and the roadside hedgerow is gappy along this edge, which is also the edge of Averham Conservation Area and its settlement edge and where there is not any proposed mitigation planting for views from this direction. The lack of a rendered visualisation/photomontage at this edge of Averham (Viewpoint 07), particularly of the impact of the proposed BESS, does not lead to a clear enough understanding of the proposed change in views experienced by the few residential receptors nearby and also upon the Conservation Area.

6.1.2 An updated visualisation for Viewpoint 7 is provided. This 'wireline overlay' illustrates how the site will remain screened by the roadside hedgerow in winter and summer months. The viewpoint assessment adopted a cautious approach, stating:

- 6.1.3 'On site assessment and the existing photographic view confirms that that there would be at most glimpsed views into the southern field of the site. As noted in the baseline view description, the tall roadside hedgerow provides a high degree of screening for properties on the opposite side of the road looking directly north towards the site. The taller BESS compound may also be glimpsed but would likely be much less noticeable as it is set further into the site.
- 6.1.4 The visual changes would be barely noticeable for road users as they would not be looking directly into the site and their views would be focussed on the road corridor.
- 6.1.5 Glimpsed views of the arrays are likely to be mainly for residents at the western end of the road with more open views out, looking north towards the site from first floor windows. The deployment would cause a barely noticeable deterioration to the view with the hedge and first few rows of arrays at the southern end of the field preventing distant views across the site.'
- 6.1.6 The wireframe overlay illustrates the visual effects from the ground level views only, specific to the viewpoint location. Overall, it is considered that from this angle, the visual effects would be less than originally stated, however as the original effects were concluded to be 'Negligible-Minor' and 'Not Substantial' these effects remain and views from this location are not considered to be a material factor.
- 6.1.7 Post assessment, during the determination period, the specification of 2 potential communications masts at the substation and BESS compound was confirmed. Review of the submitted photomontages has confirmed that there is the potential for notable visibility to them from Viewpoints 4 and 5. Updated visualisations for Viewpoints 4 and 5 are provided together with the following updated text extracts.
- 6.1.8 Table 2: Photomontage Visual Assessment Updates

Note – Original table copied, but updated sections in **bold**.

Viewpoint 4 - A617, Main Street	
Visual receptor / susceptibility to change	Road Users, Medium
Value of view	No recognition in planning terms (landscape and heritage) or literature. Not a defined scenic route. Medium
Sensitivity of visual receptor	Medium.
Scale of visual effect	On site assessment and review of the photomontage view confirms there are clear views over the southern deployment field and so a wide expanse of prominent arrays are visible covering over ground level. Views also extend northwest over the central deployment. The view is taken just inside the site boundary hedgerow but is representative of views from the footway with low gappy hedgerow at this point of the route providing very limited screening for pedestrians, more so to passing road users who will not be overly focused on views over the site. The solar deployment would equate to a large visual change where the proposals would be an important new element but not totally defining the view. Whilst there would be a loss of views across the site's landform, surrounding woodland defining the sites' boundaries and views of the internal copse will remain unobstructed. This

	vegetation will remain the most important feature and will still define overall character albeit with a partially changed composition. The BESS elements are partially visible (in a low vertical plane) above an area of the solar arrays to the west. The two communications masts rise from the BESS area, set within the wider solar deployment, their height and lattice structure similar to the distant lines of pylons, although slightly taller in perceptible vertical height due to the varying separation distances. The masts form additional vertical features but from this separation distance they do not appear overly tall or act as the main visual focus, set within a local context with similar infrastructure features present. The addition of the proposed mitigation hedgerow alongside the track in front of the solar fencing will soften the harsh edge of the deployment and for road users this will substantially screen views into the site at ground level over time once fully established c.7 years+.
Geographical extent	Located at footway between Averham and Kelham alongside the site's eastern boundary. Medium
Duration and reversibility of effect	High. Classified as permanent development due to lifespan over 40 years but reversible back to existing situation in the long term.
Magnitude of visual effect	A substantial change to ground cover but not completely defining the overall character and composition of the view. Views to distant woodland backdrop and pylons remain. Woodland still defines the overall setting. Medium-High
LEVEL OF VISUAL EFFECT	Some deterioration of the view for medium sensitivity receptors but located away from settlement edges so that views are experienced by only a few people. Road users will be less affected due to the low level nature of development. Surrounding woodland is still the most prominent element defining overall character and composition of views. Moderate-Major A 'SUBSTANTIAL' visual effect at ground level that will reduce when the proposed hedgerow planting is fully established.
Magnitude of visual effect (Year 10)	Hedgerow will soften edge of deployment and create an effective screen for motorists. The route isn't widely used by pedestrians given it is a narrow footway between settlements. Medium
Level of visual effect (Year 10)	Following the proposed hedgerow's establishment and infilling of gaps in the existing hedgerow at the roadside the solar deployment will remain noticeable when looked over by passing pedestrians but will be experienced by a low number of people and will not dominate the defining wooded setting. Roadside hedgerow to be managed to >c.4m to restrict views over the top from the carriageway, to replicate the hedgerow height seen in Viewpoint 7. Glimpsed short duration views limited to site entrance only longer term. Additional mitigation woodland and scrub planting is provided in the near (internal) area around the BESS, upon a low bund, which would further filter middle distance views to the BESS elements (excluding the masts). Moderate

	'NOT SUBSTANTIAL' visual effects and reversible in the long term
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Viewpoint 5- Kelham Conservation Area, Main Street, A617	
Visual receptor / susceptibility to change	Road Users, Medium
Value of view	No recognition in planning terms (landscape and heritage) or literature. Not a defined scenic route. Medium
Sensitivity of visual receptor	Medium
Scale of visual effect	On site assessment and review of the photomontage view confirms there are views towards the southern deployment area and BESS. The BESS compound is seen partially clipped by the woodland block on the far side of the site. Due to the unchanging topography the view is restricted to the eastern edges of the rows of arrays which screens a large proportion of the deployment behind. The lighter backside of the arrays appear less prominent than the front side as seen in viewpoint 4. Whilst, the taller BESS enclosure is clearly noticeable, seen breaking the skyline, at this distance it does not dominate the view. The two communications masts rise from the BESS area, set within the wider solar deployment, their height and lattice structure similar to the distant lines of pylons, notably in perceptible vertical height due to the varying separation distances. The masts are perceptible but from this separation distance they do not appear out of vertical scale or act as the main visual focus. Distant views to woodland and settlement (Averham) remain relatively unobstructed with arrays set down which causes an interruption in ground cover only and partial change in character and composition of the site itself. The OHT's traversing the view still draw the eye to the skyline and remain the more dominant detractors in the view. Medium at Year 1 Reducing to overall Low at Year 10, following the addition of scrub and tree planting across the southern end of the nearest field which adjoins the western boundary woodland. This mitigation planting will eventually provide a dense screen with arrays set behind so that only glimpsed views remain and in time may be limited to winter views. when vegetation is not in leaf.
Geographical extent	Effects would be experienced at the site and immediate setting from this close range position that offers a break in the roadside hedgerow. Medium
Duration and reversibility of effect	High. Classified as permanent development due to lifespan over 40 years but reversible back to existing situation in the long term.

Magnitude of visual effect	The solar deployment would be noticeable from a short section of road where breaks in vegetation allow for views through to the site's southern field. Road Users- Low-Medium
LEVEL OF VISUAL EFFECT	Road Users- Minor-Moderate A NOT SUBSTANTIAL visual effect
Magnitude of visual effect (Year 10)	Reducing to Negligible for road users, following the establishment of scrub and tree planting at the nearest field boundary set in front of visible arrays. Low. Roadside hedgerow to be managed to >c.4m to restrict views over the top from the carriageway. Additional mitigation woodland and scrub planting is provided in the near (internal) area around the BESS, upon a low bund, which would further filter middle distance views to the BESS elements (excluding the masts). Internal hedgerow by access track / permissive route also allowed to grow >4m tall.
Level of visual effect (Year 10)	Road Users- Minor NOT SUBSTANTIAL visual effects and reversible in the long term.

6.1.9 Updates to Viewpoint 4, Viewpoint 5 and Viewpoint 7 are included in support of this addendum. Following review, the only conclusions that have changed relate to Viewpoint 5. The level of visual effect at Year 10 has been updated from 'Neutral' to 'Minor'. Overall, these are still effects that are considered to be 'Not Substantial' and therefore not a material factor in the decision-making process. The visual effects as well as considering the addition of the two communications masts, also have regard to the enhanced mitigation proposals as discussed in Section 2.

7. RESPONSE TO OTHER GENERAL POINTS

7.1.1 The following comments are taken from the 'Landscape Review' and addressed as follows:

2.4. Cultural heritage and ecological designations are also considered within the LVIA, with nearby heritage assets such as Kelham Country House and Kelham Hall given local and regional importance only. As listed buildings they can surely be classified as of national importance.

2.5 .The LVIA does not include adjacent Conservation Areas when describing the function of the site, but states in the summary Landscape Value of the site and immediate Area that, 'the site's value is influenced by its location close to the nearby villages of Kelham and Averham to which it is a component part of their settings lying in close proximity to two Conservation areas'1. This is not adequately explained in the LVIA and signposts instead to a potential Heritage Assessment that is subsequently included in planning documents for the proposals. The LVIA was written without reference to a heritage report and relies heavily on judgements made through the archaeological desk based assessment when considering values regarding cultural heritage.

7.1.2 A Heritage Assessment was prepared and submitted as part of the planning application which considers the impact upon Listed Buildings and Conservation Areas. The LVIA was written with reference to the Heritage Assessment, within which, no substantial effects are concluded upon these features.

2.9. There are 11 Viewpoints in total and it is agreed that these are representative of viewpoints within the study area for potentially sensitive visual receptors It should be noted that these views are illustrative only (AVR3) and are not verifiable. For some of the most sensitive views we would recommend that it is appropriate to provide AVR4, Verifiable Views for complete clarity.

- 7.1.3 The views are verifiable and as accurate as technically possible. The photomontage work was undertaken by a key contributor to the guidance that is referenced. Within TGN06/19 a 'Type 4' relates to the highest level of accuracy, which is what the specialist subconsultants always work to, see Technical Methodology that is submitted with the application. The photomontages are AVR3 with Type 4 'survey-verified' accuracy, the footer of each visualisation states 'Type 4 Accuracy/AVR Type 3'.

