

**APPEAL IN RESPECT OF  
HILFIELD SOLAR FARM:  
LAND NORTH OF BUTTERFLY  
LANE, LAND SURROUNDING  
HILFIELD FARM AND LAND  
WEST OF HILFIELD LANE,  
ALDENHAM**

**ON BEHALF OF THE COMBINED OBJECTORS  
GROUP – Rule 6 Party**

**LANDSCAPE AND VISUAL  
PROOF OF EVIDENCE**

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**Volume 1: TEXT**

**Planning Inspectorate Appeal:  
PINS Ref: APP/N1920/W/22/3295268  
LPA Ref: 21/0050/FULEI**

**Date: September 2022**

Hilfield Solar Farm, land north of Butterfly Lane, land surrounding Hilfield Farm and land west of Hilfield Lane, Aldenham

## **LANDSCAPE AND VISUAL PROOF OF EVIDENCE**

On behalf of the Combined Objectors Group - Rule 6 Party (R6P)

Volume 1 (This document)

### **Contents:**

1.	Introduction	2
	Witness Qualification and Experience	
	Scope and Purpose of Evidence	
2.	Landscape Context and Planning	4
3.	Scheme Proposals Including Landscape Mitigation	5
4.	The Effect of The Development in terms of Landscape and Visual Impact	7
	Existing Site	
	Landscape Character	
	Visual Effects	
5.	Development Duration	14
6.	Summary of Conclusions	16

Volume 2: Appendices – figures and photographs to support the text (separate document).

# 1. INTRODUCTION

## **Witness Qualification and Experience**

- 1.1 My name is Graeme Drummond. I am a Landscape Architect, a Chartered Member of the Landscape Institute and a Fellow of the Arboricultural Association. I have been in professional practice for over 25 years. I am a founding Director and owner of Open Spaces Landscape and Arboricultural Consultants Limited (Open Spaces), a private multi-discipline practice specialising in Landscape Architecture, Arboriculture and Ecology. Open Spaces is a Registered Practice with the Landscape Institute.
- 1.2 I hold the following qualifications:  
BSc(Hons): Landscape Design and Plant Sciences  
BSc(Hons): Arboriculture  
Dip LA: Post Graduate Diploma in Landscape Architecture
- 1.3 I also hold the National Diploma in Amenity Horticulture from Cannington College, Somerset.
- 1.4 I am the Principal Landscape Architect at Open Spaces and take responsibility for large development project management, including University campus master-planning and design, urban regeneration, housing, Landscape and Visual Assessments. I have experience of Planning Appeals including Hearings and Public Inquiries. I am fully conversant with the assessment of visual and landscape effects of built development within urban, urban fringe and countryside environments.

- 1.5 I am also the Principal Arboricultural Consultant at Open Spaces and have considerable experience of trees growing within and adjacent to development sites, Tree Hazard Assessments, tree subsidence claims.
- 1.6 Between 2000-2012, I was employed as a Lecturer at Writtle College, now Writtle University College where I taught Landscape Design, Construction Detailing, Arboriculture and Landscape Planning to both undergraduate and post-graduate students.
- 1.7 I confirm that the evidence I have prepared is given in accordance with the guidance from my professional institute and is my true and professional opinion.

### **Scope and Purpose of Evidence**

- 1.8 Open Spaces have been appointed by the Combined Objectors Group (COG) - Rule 6 Party (R6P) to present specialist landscape character and visual evidence on their behalf in support of the refusal to grant permission for the application to develop land north of Butterfly Lane, land surrounding Hilfield Farm and land west of Hilfield Lane, Aldenham, Hertfordshire.
- 1.9 The application was refused for 2 reasons. Reason 1: Inappropriate development in the Green Belt and Reason 2: Harm to the significance of designated heritage assets.
- 1.10 My Proof of Evidence is divided into two volumes. One contains the text of my evidence and the other contains tables, figures and photographs to support the text.

1.11 My evidence addresses the landscape issues relating to the Council's reasons for refusal, I examine the landscape and visual effects of the proposals.

1.12 I have considered the following Appellant's documents:

- Landscape and Visual Impact Assessment (LVIA) – **(CD-PA15)** and associated Appendices.
- Landscape and Ecological Management Plan (LEMP) – **(CD-PA11)**
- Landscape and Ecological Enhancement Plan Revision E (LEEP) – **(CD-PA26)**
- Proposed Site Layout Plan – **(CD-PA2, 2a & 2b)**

## **2. LANDSCAPE CONTEXT AND PLANNING**

2.1 The Appeal site, approximately 130.6 Ha in size, situated across two land parcels (western and eastern). Settlements situated in close proximity to the site includes Bushy, approximately 250m to the west, Borehamwood, 750m to the east and Radlett, 790m to the north. The villages of Letchmore Heath lies approximately 530m to the north and Patchetts Green 1km to the northwest.

2.2 The site sits wholly within the Metropolitan Green Belt (MGB).

2.3 The key policies to consider within a landscape and/or visual context that my evidence addresses are:

NPPF

Paragraph 174b – Conserving and enhancing the natural environment

Hertsmere Local Plan Core Strategy (January 2013) and referenced within the LVIA para. 4.2.1:

- CS12 – Enhancement of the Natural Environment
- CS22 – Securing a high quality and accessible environment

Site Allocations and Development Management Policies Plan (November 2016) and referenced within the LVIA para.4.2.2:

- Policy SADM11 – Landscape Character
- Policy SADM30 – Design Principles

### 3. SCHEME PROPOSALS INCLUDING LANDSCAPE MITIGATION

3.1 The proposed development is described as:

*“Installation of renewable led energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electrical storage containers together with substation, inverter/transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure, landscaping and biodiversity enhancements”.*

3.2 The proposed development is set out within para 4 of the Design and Access Statement (**CD-PA5**) refer also to the Appellants Proposed Site Layout Plan (**CD-PA2**) and LEEP Rvs E (**CD-PA26**).

3.3 The Site Layout Plans - ref: CD-PA2, 2a & 2b sets out the general location of the different elements, however, at 1:2,500 scale, it is very difficult to determine with appropriate accuracy where each element is situated.

- 3.4 The LEEP – (**CD-PA26**) identifies the proposed landscape strategy but at 1:5,000 scale, it lacks clarity. A 1:500 scale plan would have provided more clarity.
- 3.5 Landscape mitigation is identified within the LEEP and LEMP para. 2.1 but only in outline. The Appellant has not provided full landscape planting proposals nor planting schedules identifying plant species, location, density etc. This is left to Planning Condition, however as the proposed development is contentious, it would be expected that this information would accompany the application. It is now likely that important detailed landscape design will be approved at Officer level thereby taking the decision making away from the Inspector. The lack of this information, especially in relation to such a substantial scheme, has resulted in the inability to properly assess harm as a matter of principle.
- 3.6 A description of the landscape proposals are set out within para 2.1 of the LEMP (**CD-PA11**). Much of the proposed landscape appears to benefit biodiversity rather than to provide suitable mitigation for the proposed development. Many of the footpaths crossing the site lack suitable mitigation in the form of screening. Refer to my Appendix C and D. Clear views of the proposed development, including the perimeter fencing and the solar arrays will remain when viewed from footpaths Aldenham 30, 32, 40, 42, 43, 44, Bushey 37, 38. Refer to my Appendix A - Base Map 1. These views are incongruous with the existing open views from these footpaths.
- 3.7 Existing site vegetation will be retained; however, this vegetation should not be considered as part of the proposed mitigation measures as it is already growing within the site and forms an intrinsic part of the character of the site. It is, however, proposed within the LEMP para 5.2

that existing hedgerows will be allowed to grow out. The LEMP para 2.1 suggests that allowing hedgerows to grow out will benefit biodiversity whereas, it is my opinion that this will result in a loss of important hedgerow habitat. It is also my opinion that this lack of management will further degrade the pattern of hedgerows across the site and will likely create a more visually porous hedgerow when viewed at ground level and therefore will harm the existing landscape character.

- 3.8 The proposed landscape mitigation will introduce features and management styles at odds with the current intact agrarian landscape as identified within the Hertfordshire Landscape Character Area Assessment – Area 22 (**CD-HCCP4**), resulting in an unmanaged semi-industrialised landscape.

#### 4. **THE EFFECT OF THE DEVELOPMENT IN TERMS OF LANDSCAPE AND VISUAL IMPACT**

##### **Existing Site**

- 4.1 The existing site comprises of 20 No. irregularly shaped medium to large agricultural fields across two parcels of land, east and west. Many of the fields are edged with mature native hedgerows set within an agrarian landscape. There are a number of PRow's crossing the site, some following field edges whilst others are situated more centrally within the fields. Refer to the LEEP (**CD-PA26**).
- 4.2 There are clear views across the site from the numerous footpaths traversing the site, and also from higher ground to the northwest of the eastern land parcel and from the east of the western land parcel. This higher ground is identified in the Appellants LVIA 'Appendices Figures 1-6' - Figure 3 Topography. Typical views comprise of agricultural fields bordered with mature native hedgerows and when considered within the

agricultural context helps define the character of the agrarian landscape.

- 4.3 Visible detractors within the site are generally limited to the overhead power cables and associated support towers, however, these are not notable focal points and do not detract from the agrarian character of the site and surrounding area.

### **Landscape Character**

- 4.4 The site sits entirely within National Landscape Character Area (NCA) 111: Northern Thames Basin. Due to the scale of this NCA, I make no further comment.
- 4.5 Hertfordshire Landscape Character Assessment – HLCA (2001) (**CD-HCCP4**) identifies the site as sitting within Borehamwood Plateau Landscape Character Area (LCA). The Site's northern edge borders Aldenham Plateau LCA. Refer to LVIA Figure 5. As these LCA's sit within the MGB, they should be considered in relation to the proposed development and assessed for openness, including visual openness of the Green Belt.
- 4.6 Key characteristics, of which I agree with, taken from the Borehamwood Plateau and Aldenham Plateau Landscape Character Assessments – Area 22 & 16 (**CD-HCCP4**) – are identified within the Appellant's LVIA para 7.3.1 and 7.3.2. In addition, the Borehamwood Plateau Landscape Character Assessment states:

*“An area of gently undulating landform and considerable pasture within an intact landscape framework. A combination of tall bushy hedgerows and field trees contain views into and across the landscape”.*

4.7 The Appellant's LVIA para 1.1, states:  
*Effects on landscape character are greatest within the Site and its immediate context where the landscape would change from agricultural character to containing built form*".

The Appellant's LVIA para 7.2, states:  
*"It is to be expected there will be **Large** scale effects on the character of the Site given that it is changing from agricultural to built development"*.

The Appellant clearly recognises the scale and type of effects. And that the Site's baseline will be fundamentally changed.

4.8 LVIA para 7.2 also states:  
*"How rapidly effects diminish beyond the Site depends on the scale of development, the context and visibility of the proposal"*.

The Appellant identifies that there will be landscape effects beyond the Site but does not explain the extent of these effects. I have considered the impact on the LCA's and it is my opinion that landscape effects will cause harm not only to the Borehamwood Plateau LCA which sits within the Site but also the Borehamwood Plateau LCA and Alderham Plateau LCA which sits beyond the Site. Para. 5.50 of GLVIA (**CD-NPP14**) states:

*"The geographical area over which the landscape effects will be felt must also be considered. This is distinct from size or scale of the effect"*

GLVIA para 5.50 then includes a number of levels of duration which should be considered when assessing the magnitude of landscape effects including: at the site level, within the development site itself; at

the level of the immediate setting of the site; and at the scale of the landscape type or character area within which the proposal lies. In my opinion, the landscape harm caused by the proposed development goes beyond harm caused at the site level and in the immediate setting of the site, to also causing harm:

*“At the scale of the landscape type or character area within which the proposal lies”.*

- 4.9 It is my opinion that the Borehamwood Plateau LCA situated within the site, will be harmed by the proposed development and using the same methodology as set out within para. 3 of the Appellant’s LVIA to assess landscape effect, I have assessed this harm as Major-Moderate and Adverse. It is my opinion that the LCA as a whole must therefore also be harmed to the same degree.
- 4.10 There are clear views of a substantial part of the eastern parcel of proposed development land from footpath Aldenham 17 just to the south of the settlement of Batlers Green refer to my Appendix A Viewpoints for viewpoint location and Appendix B Batlers Green Viewpoint for photograph. This footpath is situated within the Aldenham Plateau LCA. As this footpath joins to the Hertfordshire Way, some 100m to the south of the viewpoint, it is highly likely that many of the footpath users, do so to enjoy the countryside and the views across the agrarian landscape. It is therefore likely that their expectation will be of an intact agrarian landscape. Using the same methodology as set out within para. 3 of the Appellant’s LVIA to assess landscape character, I have assessed the harm to the Aldenham Plateau LCA as Major-Moderate and Adverse.
- 4.11 LVIA para 7.2 identifies that large scale effects will occur within the site and within the immediate context of the site. As the site forms a

substantial portion of the Borehamwood Plateau LCA, it is my opinion that there will be large scale effects and therefore harm to a large part of the Borehamwood Plateau LCA. I do not agree that this harm has been suitably mitigated.

- 4.12 The Appellant has incorporated 5m offsets to the PRow's which traverse the site. To each edge of these offsets will be situated 2.2m high deer proof fences. No suitable landscape mitigation has been proposed for many of these PRow's, including Aldenham 30, 32,40, 42, 43, 44 and Bushey 38, which will result in channelled footpaths situated between 2.2m high fencing set 5m to each side, refer to paragraph 3.6 of this report. Beyond the 2.2m high fences will be 3m high solar PV arrays as well as other elements of the proposed development as set out within para. 3.2 of this report. The combined visual effect of the fences and solar PV arrays will obscure views across the currently open fields. In addition, views from footpaths will also be channelled along the 10m wide corridors with development to each side and with no suitable landscape mitigation, refer to Appendix C & D of this report.
- 4.13 With the extent of the proposed development and lack of suitable mitigation, it is likely that the proposed development will cause harm to both the Borehamwood Plateau LCA and Alderham Plateau LCA and that this harm will be significant. Using the same methodology as the Appellant, I would assess the effect of the proposed development on both the LCA's as Major-moderate and adverse pre and post mature mitigation planting. Refer to Appendix E – Summary of Effects Table.

### **Visual Effects**

- 4.14 The Appellant has identified a number of Viewpoints situated across the site. Photographs taken from each viewpoint are also included within

the LVIA Appendices. In addition, photomontages of the proposed development have been superimposed onto some of these photographs and are also included.

- 4.15 Para 6.33 of GLVIA (**CD-NPP14**) identifies the Visual Receptors most susceptible to change including:

*“People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focussed on the landscape and on particular views”*

*“Visitors to heritage assets or other attractions, where views of the surroundings are an important contributor to the experience”*

*“Communities where views contribute to the landscape setting enjoyed by residents in the area”*

- 4.16 Seven illustrative viewpoints (A-G) are included within the LVIA Appendix – Figure 8 Illustrative Viewpoints. These are points where the site is not visible from the Viewpoint. **Illustrative Viewpoint C** is from a PRow situated at or near to the junction of footpaths Alderham 17 and 31A. However, when I visited site, I continued along Alderham 17 towards Batlers Green situated on higher land and identified, what I would consider to be one of the most important Viewpoints, identified as A1 in my Appendix A. From this viewpoint, there are clear views across Fields 12, 13, 15, 16 and 17, Slades Farm and adjacent buildings which front onto Butterfly Lane – refer to my Appendix A – PRow Base Map 2. It is my opinion that these same clear views will also exist once any mitigation planting has matured and further, it is likely that greater views of the proposed development will be visible during the winter months when intervening vegetation has shed its leaves.

4.17 From the **Appellant's Viewpoint 3**, situated on higher ground near to the western end of Elstree Aerodrome, there are views towards Hilfield Farm and the existing electricity sub-station. These views extend across Fields 2, 3 4 and 5. I have taken additional photographs approximately 100m along the same PRow (Bushey 38) to the west of Viewpoint 3 (A2 in Appendix B) which when added to the Appellant's Viewpoint 3, shows the extent of the view from a substantial length of PRow Bushey 38.

4.18 Many of the Appellants Viewpoints include Type 1 photographs as prescribed (by Landscape Institute TGN 06/19 - **CD-NPP16**). Type 1 photographs should be annotated "*to represent context and outline or extent of development and of key features*" – Refer to para 4 of TGN 06/19.

For example, the **Appellant's Viewpoint 5** should annotate the location of PRow Aldenham14 and 29, both of these footpaths are prominent in the landscape but are not clearly identifiable within the photograph. It would have been beneficial for the Appellant to have produced a photomontage of the proposed development from this viewpoint. Should this have been carried out, there would be a clear understanding of the 5m offsets to each side of the footpaths, the dominance of and channelling effect caused by the proposed fencing and PV arrays and the lack of suitable landscape mitigation.

4.19 The Appellant has identified **Viewpoint 9**, and I agree with this location (refer to LVIA Figure's 7 and 9). The Appellant's photographs include a two-page panoramic view extending across Field 14. The Appellant has also produced a photomontage to include the site fencing PV arrays for the photograph covering Aldenham 40 only. Should the Appellant have produced a photomontage to cover the whole panorama, it would have

included footpath Aldenham 44, and the channelling effect of the proposed development along this footpath would become evident as would the scale of the proposed development and lack of suitable mitigation when viewed from the footpath. I would also point out that the LEEP (**CD-PA26**) identifies existing planting along this northern site boundary which is clearly not the case when viewing the photographs. In addition, the photomontage appears to show recently planted mitigation, possibly in error as this is not identified on the LEEP. I have included a photomontage of the complete viewpoint which shows not only PRow Aldenham 40 as per the Appellant's photomontage but also extending the photomontage to include Aldenham 44, the channelling effect of the PRow and the lack of suitable landscape mitigation.

4.20 It is my opinion that even with landscape mitigation, views of the solar farm will be greater during the winter months when the intervening vegetation are bare leaved.

4.21 It is my opinion that the magnitude and close proximity of the proposed development would cause significant harm to the Visual Receptors, that is, all those who use the footpaths crossing and adjacent to the site.

4.22 I have included within my Appendix E – Summary of Effects Table, my assessment of a number of the Appellant's Viewpoints

## 5. **DEVELOPMENT DURATION**

5.1 It is proposed LVIA para 3.2.2 that the solar farm will have a lifetime of 35 operational years from the date of the first exportation of electricity from the site and that the proposed development will be fully reversible. This 35-year timeframe is identified by the Appellant's LVIA para 3.2.2 and para 7.5 as "*semi-permanent*". The LVIA identifies within the table,

paragraph 3.2.2 – Duration, which accords with GLVIA 3<sup>rd</sup> Edition (**CD-NPP14**) paragraph 5.51, that long term duration is 10-25 years whilst permanent is identified as, ‘there being no intention for the proposed development to be reversed’. In my opinion, the Appellant’s and GLVIA’s definition for long-term is correct and therefore, in my opinion, should a proposed development exist beyond the 10-25 years, it should be raised to the next category within the Appellant’s table, which is permanent. It is my opinion that the Appellant has followed the guidance within GLVIA 5.51 & 5.52 and must therefore equate the development duration beyond 25 years as non-reversible and permanent. It is also my opinion that a 35-year period is equivalent to a generation and will therefore be perceived as permanent by Visual Receptors and will permanently alter the Landscape Character.

- 5.2 DAS (**CD-PA5**) Para. 5.3 appears to suggest that each element of the proposed development will have a 35-year duration and not the development as a whole. Without clarification from the Appellant, the development operational lifespan could be increased beyond 35 years, if for example, only part of the proposed development became active once installed.
- 5.3 Should the proposed development proceed with the duration i.e. 35 operational years set within a planning condition, there would be no barrier for this duration to be increased under a later variation of condition. This variation of condition will likely be determined at Officer level.
- 5.4 LVIA Para 6.1 states:  
*“It is anticipated the solar farm would be in operation for up to 35 years. When it ceases to be operational, all elements can be removed and the site re-instated to its former agricultural condition”.*

LVIA para. 7.1 makes clear that the proposed mitigation planting will not be removed when the solar farm is decommissioned but will become permanent. The Appellant makes no comment as to whether hard standings and access tracks will be removed.

5.5 LVIA para 6.1 indicates that the PV arrays will be supported by direct piling or screw piling. Although screw piles are easier to insert and remove, this is unlikely to be the case for direct piles. No information is forthcoming as to how, at the end of the operational life of the development, direct piles /screw piles will be removed and there is no methodology included within the Appellant's documentation for such removal. It is my opinion that direct piles will not be removed at the end of the operational life of the development and if this is the case, will likely impact on the land being used at a later date for agricultural purposes.

5.6 The Appellant has stated that the landscape mitigation will be retained beyond the 35-year life span of the solar farm. For the existing landscape character to be returned to the present condition, it would be necessary to remove this landscape mitigation and manage the hedgerows which had been left to grow out. In my opinion, the landscape mitigation in the form of hedgerows and trees would not be removed due to the impact on biodiversity and therefore the current character of the LCA will be permanently altered and the intact landscape harmed.

## 6 **SUMMARY OF CONCLUSIONS**

6.1 The appeal site relates to the installation of a new solar farm, together with associated infrastructure including roadways, fencing and landscape mitigation measures.

- 6.2 The site, approximately 130.6 Ha in size, is situated across two connected parcels of land (west and east). The site sits wholly within the Metropolitan Green Belt.
- 6.3 My evidence addresses the effect of the development landscape character, visual effect, duration, and landscape mitigation.
- 6.4 I have considered a number of documents and plans produced by the Appellant including the LVIA, LEMP, LEEP and proposed Site Layout Plan. I found the LEEP to be of a scale, difficult to understand and reach a clear understanding of the Appellants design intentions. I also found that the Appellant had not produced a detailed landscape proposal to support the landscape mitigation and therefore it was not possible to fully assess the landscape mitigation in relation to harm.
- 6.5 Existing landscape features, including hedgerows and mature trees will be retained on site, however, I do not consider those elements as contributing to landscape mitigation as they are already part of the landscape and already contribute to landscape character. Proposed landscape mitigation will introduce new features into an intact agrarian landscape which will detract from the existing landscape character.
- 6.6 The Appellant acknowledges that the proposed development is considered as inappropriate development and therefore by definition harmful to the Green Belt.
- 6.7 There are clear views across the site from the numerous footpaths traversing the site. There are also clear views from nearby higher ground to the northwest of the eastern parcel and northeast of the eastern parcel. Many of the views help to define the agrarian

character of the site and that of the surrounding Borehamwood Plateau Landscape Character Area.

- 6.8 The Appellant agrees that the effects of the proposal will be greatest within the site and its immediate context where the landscape would change from an agricultural character to containing built form. The openness of the agrarian landscape will be replaced with an industrialised landscape where footpaths are channelled through 10m wide corridors bounded on each side with 2.2m high fences and 3.0m high solar arrays which lack suitable landscape mitigation. The Appellant acknowledges that there will also be effects beyond the site but doesn't explain what these effects are.
- 6.9 Using the same methodology as set out within the LVIA, I assessed the proposed development as causing high-moderate and adverse harm to the Borehamwood Plateau LCA of which the site sits within. I assessed that harm would be caused to the area of the LCA containing the proposed development and therefore also, the LCA as a whole.
- 6.10 From higher ground to the northwest of the site, close to Batlers Green, identified in Appendix B - Viewpoint A1 within my evidence, there are clear views across the eastern parcel of land. It is my opinion that the Appellant did not consider this Receptor situated within the Alderham Plateau LCA within their evidence. The proposed development will be clearly visible from this Receptor and using the same methodology as set out within the LVIA, I assessed the proposed development as causing high-moderate and adverse harm to the Alderham Plateau LCA

- 6.11 The Appellant has identified 12 No. Visual Receptors and has produced panoramic photographs for each. A limited number of photomontages have been produced with the proposed development superimposed. Some of these photographic montages do not show fully the proposed development or the channelling effect of the post-development footpaths. Not all photographs are fully annotated which would normally be expected for “Type 1” photographs, to give context to the viewer. The Appellant did not appear to fully assess their own Visual Receptors on an individual basis but confusingly, partially assessed the Visual Receptors within groups thereby providing a confused assessment of the visual harm.
- 6.12 Within my Appendix I have carried out an assessment of the Visual Receptors using the methodology as set out within the Appellant’s LVIA. In total I assessed the proposed development as causing major harm and adverse to 6 No. Visual Receptors, moderate harm and adverse to a further 3 No. Receptors. In addition, I assessed the proposed development on two additional Receptors, identified as A1 and A2 within my Appendix B & E as causing major harm and adverse.
- 6.13 Lastly, I discuss the permanence of the proposed development which will have an operational life of 35 years; however, it is also possible that this timeframe could be extended in different ways including through a variation of planning condition. The 35-year timeframe is identified as temporary and long term within the DAS but also semi-permanent within the LVIA. The Appellant and GLVIA identifies long term as 15-25 years and as the 35-year time period is considerably longer than the 15-25 years, it is my opinion, a 35-year duration should be considered as permanent.

- 6.14 The proposed development is described as reversible by the Appellant; however, the Appellant has also stated that the landscape mitigation would be retained permanently. The Appellant has not indicated whether the roadways, hard surfaces or piles which support the solar arrays will be removed post development. In addition, the 35 year period equates to a generation and for many Receptors, this will be deemed to be permanent.
- 6.15 When assessing the proposed development, it is my opinion that it will cause harm to the landscape character of the LCA, it will cause harm to the majority of Visual Receptors as identified by the Appellant and that the proposed development should be considered permanent.