

Greenfields Farm Battery Energy Storage System

Appendices to the Environmental Statement Chapter 6: Landscape and Visual
Impact

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Note

These LVIA Appendices are an update to the previous report appendices submitted with Greenfields BESS ES; with all new text highlighted red. Text in black is unchanged. These appendices are broadly updated in line with any changes to policy since the submission of the original planning application.

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This document has been prepared and checked in accordance with ISO 9001:2015.

Appendix 6.5 National and Local Planning Policy and Guidance

National Planning Policy

The National Planning Policy Framework (NPPF, updated 12 December 2024) makes clear that the purpose of planning is to help achieve sustainable development (Section 2), and that making effective use of land (Section 11), well-designed and beautiful places (Section 12), and conserving and enhancing the natural environment (Section 15) are important components of this.

Paragraph 11 sets out that in determining applications for development, this means that developments which accord with an up-to-date development plan should be approved.

Where there are no relevant development plan policies, or where the policies are out-of-date, paragraph 11 directs that the permission should be granted unless “any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole...”; or “...the application of policies in this Framework that protect areas or assets of particular importance⁷ provides a strong reason for refusing the development proposed...”.

The areas or assets of particular importance, in respect of landscape and visual matters referred to within the associated footnote 7, are as follows:

- National Landscape
- National Park (or within the Broads Authority)
- Heritage Coast.

The list also includes important habitats sites, irreplaceable habitats and / or designated as Sites of Special Scientific Interest; land designated as Green Belt or Local Green Space; designated heritage assets or heritage assets of archaeological interest; and areas at risk of flooding or coastal change.

Section 11 sets out considerations in relation to ‘Making Effective Use of Land’; noting in paragraph 129 that, in respect of development density, the considerations should include whether a place is well-designed and “...the desirability of maintaining an area’s prevailing character and setting [...], or of promoting regeneration and change”. Paragraph 129 also notes “the importance of securing well-designed, attractive and healthy places.”

Paragraph 130 also advises that “area-based character assessments” can be used to “...help ensure that land is used efficiently while also creating beautiful and sustainable places.”

Section 12 sets out considerations in relation to ‘Achieving well-designed and beautiful places’ and indicates in paragraph 135 that planning policies and decisions should ensure that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);

d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;

e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) ...”

Section 12, paragraph 136 also advises that:

“Trees make an important contribution to the character and quality of the urban environment and can also help mitigate and adapt to climate change. Planning policies and decisions should ensure that new streets are tree-lined⁵², that opportunities are taken to incorporate trees elsewhere in developments (such as parks and community orchards), [...] and that existing trees are retained wherever possible.”

Footnote 52 notes that “Unless, in specific cases, there are clear, justifiable and compelling reasons why this would be inappropriate.”

Section 15 of the NPPF ‘Conserving and enhancing the natural environment’ covers both ecological and landscape matters. Paragraph 187 requires that planning policies and decisions should contribute to and enhance the natural and local environment by:

“a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);

b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;

c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures and incorporating features which support priority or threatened species such as swifts, bats and hedgehogs;

e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans; and

f) remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate.”

In respect of valued landscapes, paragraph 188 notes that planning policy and decisions should “...distinguish between the hierarchy of international, national and locally designated sites...”.

Paragraphs 189 – 191 require that:

“189. Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and National Landscapes which have the

highest status of protection in relation to these issues. The conservation and enhancement of wildlife and cultural heritage are also important considerations in these areas, and should be given great weight in National Parks and the Broads⁶⁶. The scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas”

“190. When considering applications for development within National Parks, the Broads and National Landscapes, permission should be refused for major development⁶⁷ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include an assessment of:

- (a) the need for the development, including in terms of any national considerations, and the impact of permitting it, or refusing it, upon the local economy;
- (b) the cost of, and scope for, developing outside the designated area, or meeting the need for it in some other way; and
- (c) any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.

191. Within areas defined as Heritage Coast (and that do not already fall within one of the designated areas mentioned in paragraph 189), planning policies and decisions should be consistent with the special character of the area and the importance of its conservation. Major development within a Heritage Coast is unlikely to be appropriate, unless it is compatible with its special character.”

Footnote 67 notes that for the purposes of paragraphs 190 and 191, “...whether a proposal is ‘major development’ is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined.”

Paragraph 198 requires planning policies and decisions to ensure that “...new development is appropriate for its location...” including by limiting the “...impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.”

National Planning Guidance

Planning Practice Guidance for Natural Environment, July 2019

This document is intended to explain the key issues in implementing policy to protect biodiversity, enhance green infrastructure and also contains a section on landscape. This section reiterates the policy set out in the NPPF, highlights the importance of identifying the special characteristics of locally valued landscapes and recommends the use of landscape character assessments.

With regards to National Parks, the Broads and AONBs, the guidance states that:

“Section 11A(2) of the National Parks and Access to the Countryside Act 1949, section 17A of the Norfolk and Suffolk Broads Act 1988 and section 85 of the Countryside and Rights of Way Act 2000 require that ‘in exercising or performing any functions in relation to, or so as to affect, land’ in National Parks and Areas of Outstanding Natural Beauty, relevant authorities ‘shall have regard’ to

their purposes for which these areas are designated” (para 039). The same paragraph also requires consideration of the effects of development on the setting of AONBs.

The guidance also highlights that Natural England has published advice on Heritage Coasts. This guidance indicates that heritage coasts are *“managed to conserve their natural beauty and, where appropriate, to improve accessibility for visitors”* (para 043).

This document also provides guidance on green infrastructure, highlighting types of green infrastructure (para 004) and the benefits which they provide (005), including achieving well-designed places as *“green infrastructure exists within a wider landscape context and can reinforce and enhance local landscape character, contributing to a sense of place and natural beauty”* (para 006).

Planning Practice Guidance for Design: process and tools, October 2019

The guidance should be read alongside the National Design Guide and sets out the characteristics of well-designed places and demonstrates what good design means in practice. The guidance indicates that good design relates to 10 characteristics:

- context
- identity
- built form
- movement
- nature
- public spaces
- uses
- homes and buildings
- resources
- lifespan

In respect of the determining applications and the relationship between a proposal and the surrounding context, the guidance notes that:

“permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions ...”

National Design Guide, January 2021

The guidance sets out characteristics of *‘beautiful, enduring and successful places’* that reflect the *‘Government’s priorities and a common overarching framework’* and provides cross references to the National Planning Policy Framework.

The guidance indicates that *‘context, history and the cultural characteristics of a site, neighbourhood and region influences the location, siting and design of new developments’*.

In respect of context, the guidance indicates a positive sense of place and further notes that well-designed places are:

- based on a sound understanding of the features of the site and the surrounding context, using baseline studies as a starting point for design

- integrated into their surroundings so they relate well to them
- influenced by and influence their context positively; and
- responsive to local history, culture and heritage.

The guidance indicates that identity *‘or character of a place comes from the way that buildings, streets and spaces, landscape and infrastructure combine together... Local character makes places distinctive.’*

In respect of identity, the guidance further notes that well-designed places, buildings and spaces:

- have a positive and coherent identity that everyone can identify with...;
- have a character that suits the context, its history...;
- are visually attractive...

The guidance indicates that nature *‘contributes to the quality of a place, and to people’s quality of life, and it is a critical component of well-designed places.’* Natural features include *‘natural and designed landscapes, high quality public open spaces, street trees, and other trees, grass, planting and water’*.

In respect of nature, the guidance further notes that well-designed places:

- integrate existing and incorporate new natural features into a multifunctional network that supports quality of place.
- prioritise nature so that diverse ecosystems can flourish to ensure a healthy natural environment that supports and enhances biodiversity.
- provide attractive open spaces in locations that are easy to access.