15 April 2026
Our Ref: DD/DD/430129
App Ref: EN010162
Email: [redacted]@bbslaw.co.uk

FAO: The Examining Authority
Planning Inspectorate
c/o QUADIENT
69 Buckingham Avenue
Slough
SL1 4PN

**BY E-PORTAL**

Dear Sir / Madam

**OUR CLIENTS: MR RICHARD GILL, MRS LISA GILL & DRONE DEFENCE SERVICES LTD SUBMISSIONS FOR DEADLINE 5**

We continue to act for our clients, Mr Richard Gill, Mrs Lisa Gill and Drone Defence Services Limited ("DDS"), Interested Parties in this Examination.

Please find enclosed our clients' submissions for Deadline 5 including:

1. The Technical Note including Residential Amenity Assessment (RVAA) dated April 2026; and
2. Interested Partys' Response to the Applicant's Position Statement (Annex 2).

**Relevant Submissions**

1. Interested Party's Response to the Applicant's Position Statement (Annex 2)

   This document responds to the Applicant's Position Statement contained within Annex 2 submitted at Deadline 4 (EN010162/APP/8.29). It addresses matters arising from the Applicant's consolidated response to the Interested Party's earlier submissions, including legal rights benefiting Caunton Lodge Farm, compulsory acquisition and necessity, the proposed service corridor, drone operations, planning status assertions, and landscape, heritage and design considerations. Where matters raised by the Interested Party have not been substantively addressed, the Interested Party's position is maintained and expressly reserved.

2. Caunton Lodge Farm Landscape Technical Note including Residential Visual Amenity Assessment (April 2026)

This Technical Note, prepared by MHP Design Ltd, provides a site-specific Landscape Technical Note and Residential Visual Amenity Assessment for Caunton Lodge Farm. It assesses baseline visual conditions and the effects of the proposed development on residential visual amenity, informed by site inspection and established best-practice guidance.

3. Applicant's Plan (Appendix [X])

   This document comprises the Applicant's plan showing the indicative recommended services corridor, as referred to within the Caunton Lodge Farm Landscape Technical Note at paragraph 2.4.9. It is submitted separately for ease of reference, to assist the Examining Authority in considering the spatial context of the Applicant's proposed corridor and the Interested Party's submissions in relation to service routing and associated effects.

**Next steps**

The above note and documents enclosed herewith should be read together with our clients' previous submissions.

Our clients remain fully engaged with the Examination and are available to provide any further clarification the Examining Authority may require.

No additional representations are made by way of this covering letter.

Yours faithfully,

*BBS LAW*

**BBS LAW**

# Caunton Lodge Farm, Norwell Woodhouse.

Landscape Technical Note including Residential Visual Amenity Assessment (RVAA)

April 2026

MHP DESIGN LTD – CHARTERED LANDSCAPE ARCHITECTS - MASTERPLANNERS - ARBORICULTURALISTS

| | |
|---|---|
| MHP Project number: | 26049 |
| Project name: | Caunton Lodge Farm, Norwell Woodhouse |
| Client: | Mr and Mrs Gill |
| Issue number: | V3 |
| Date: | April 2026 |
| Author: | [redacted] |
| Checked by: | MHP |

# 1 INTRODUCTION

1.1.1 MHP Design Ltd are Chartered landscape architects and a registered practice of the Landscape Institute. MHP have been instructed by Mr and Mrs Gill to provide a landscape technical note including Residential Visual Amenity Assessment (RVAA) in response to the Great North Road Solar Farm and Biodiversity Park application and in particular the Applicant's Deadline 3 position statement. This technical note and assessment is relevant to land at Caunton Lodge Farm, Norwell Woodhouse.

1.1.2 Caunton Lodge Farm is a private, family residence comprising two storey traditional buildings set in open garden and grounds with access via a separate farm drive. Planning approval has recently been obtained for an eco-pod home office at the property which is to be located at the southern end of the property, presently comprising open lawn with uninterrupted views to the south and west.

1.1.3 The location of the property with reference to what3words is /fancied.valuables.darkens.

1.1.4 This technical note and RVAA considers potential effects to residential visual amenity in the context of the proposed Great North Road Solar and Biodiversity Park.

## 1.2 Aims and Scope of Assessment

1.2.1 The objective of this technical note is to assess the visual effects upon private residents potentially arising from the proposed solar farm development. In particular the installation of solar arrays up to 4m in height to the south and to the west of the property. The RVAA element of this assessment has been undertaken with regards to the best practice within the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) and the Landscape Institute's Technical Guidance Note 2/19. GLVIA3 notes the need for a 'residential amenity assessment' to consider the effects of development on

views from private properties. This technical note also gives consideration to the RVAA undertaken by the Applicant and identifies potential inconsistencies in the baseline and how the hierarchy of mitigation measures does not appear to have been consistently applied across the wider project.

1.2.2 LI TGN 2/19 explains that "the purpose of RVAA is to provide an informed, well-reasoned answer to the question: 'is the effect of the development on Residential Visual Amenity of such nature and / or magnitude that it potentially affects 'living conditions' or 'Residential Amenity'?'" (LI TGN 2/19, Page 5, Para. 2.1) [1].

1.2.3 The LI guidance note outlines that RVAA 'should provide a transparent, objective assessment, grounded in GLVIA3 principles and processes, evaluating and assessing the likely change to the visual amenity of a dwelling resulting from development'[2].

1.2.4 The RVAA does not consider other components of residential amenity such as noise, dust or glint and glare.

## 1.3 Methodology

1.3.1 This RVAA draws upon the overarching best practice within the Landscape Institute's Guidelines for Landscape and Visual Impact Assessment 3rd Edition (GLVIA3) and Technical Guidance Note 2/19. The TGN advises in paragraph 1.6 that:

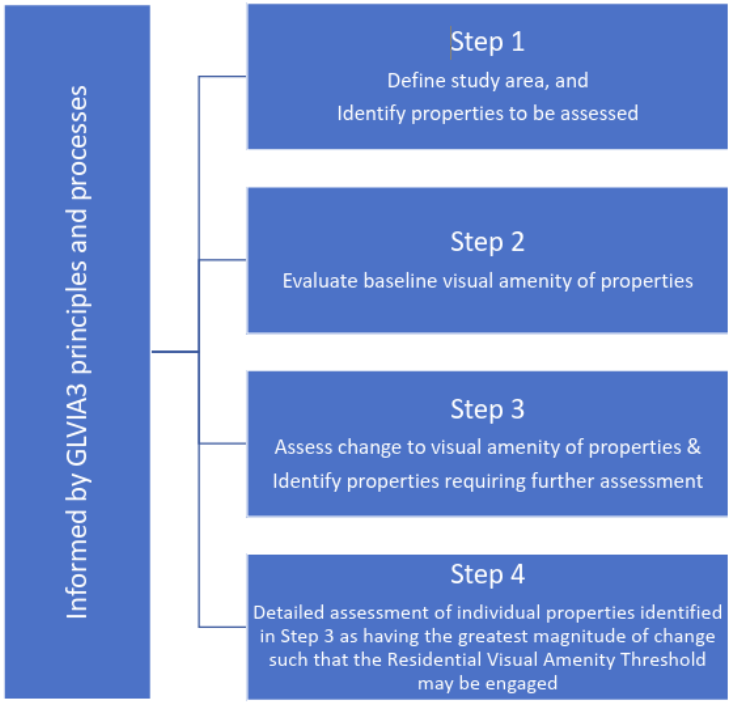
*"It is not uncommon for significant adverse effects on views and visual amenity to be experienced by people at their place of residence as a result of introducing new development in the landscape. In itself this does not necessarily cause a planning concern. However, there are situations where the effect on the outlook / visual amenity of a residential property is so great that it is not generally considered to be in the public interest to permit such conditions*

[1] Landscape Institute's RVAA Technical Guidance Note 2/19

[2] Landscape Institute's RVAA Technical Guidance Note 2/19

*where they did not exist before."[3] This is a high threshold for what would be deemed unacceptable for residential visual amenity and is referred to as the Residential Amenity Visual Amenity Threshold. ''*

1.3.2 In accordance with the Technical Guidance Note 2/19, this RVAA comprises a four stage process. The process is summarised within the diagram below as an extract on page 7 of the Technical Guidance Note 2/19 as shown below:




## RVAA Stages 1-3

1.3.3 Stages 1 to 3 follow the scope of the LVA/LVIA assessing the magnitude of visual effect, and identifying any changes to visual amenity likely to be experienced by occupants of properties identified while scoping the RVAA. The identification of receptors should be informed by the LVA ZTV analysis and be proportionate to the proposed development. Just because a view is identified from a property or was assessed as having a 'significant effect' within the LVIA does not necessarily mean it should be included in the RVAA.

[3] Landscape Institute's RVAA Technical Guidance Note 2/19

1.3.4 Evaluating the baseline visual amenity considers the type, nature extent and quality of existing views from residential properties including building curtilages, private gardens and driveways as outline in Technical Guidance Note 2/19 as follows:

*"When evaluating the baseline, it is recommended that the following aspects are considered:*

*• the nature and extent of all potentially available existing views from the property and its garden / domestic curtilage, including the proximity and relationship of the property to surrounding landform, landcover and visual foci. This may include primary / main views from the property or domestic curtilage, as well as secondary / peripheral views; and*

*• views as experienced when arriving at or leaving the property, for example from private driveways / access tracks."* [4]

1.3.5 The following baseline information was recorded, further to a site visit to the property undertaken with permission of the owner on the 23rd March 2026:

▪ The orientation and likely views from each property (including principal/primary aspects and presence of windows);

▪ Layout and orientation of the gardens and property curtilage;

▪ Access location and orientation, and likely views from private or shared driveways or access tracks;

▪ The nature of existing views from the properties and their gardens, including the proximity and relationship of the properties to surrounding landform, landcover and visual foci and the scenic quality of views; and

▪ Potential screening provided by local variations in topography, the built environment and vegetation/tree cover within the surrounding landscape.

1.3.6 In considering baseline visual amenity, the following was examined:

▪ The nature and extent of the available existing views (including main/principal views) from the property and its garden and grounds, including the proximity and relationship of the property to surrounding landform, landcover and visual foci; and

[4] Landscape Institute's RVAA Technical Guidance Note 2/19

▪ Views experienced when approaching or departing from the property via its driveway and/or access roads, if applicable.

Views from an approved new home office to be located close to the southern boundary of the property.

▪ Potential screening provided by local variations in topography, the built environment and vegetation/tree cover within the surrounding landscape.

### Landscape and Visual Assessment Criteria

1.3.7 Following the processes of GLVIA3, landscape and visual **sensitivity** are determined by combining judgements of the **susceptibility** of the receptor to the proposed change and the **value** of the receptor. The assessment criteria for each are based on a scale of High, Medium-high, Medium, Medium-Low, Low or Negligible.

Higher value views from the residential properties might include:

• Views from ground floor windows on principal elevations of the building and are likely to correspond to primary living rooms such as lounge, dining rooms, kitchens or conservatories; and

• Views from rear gardens or heavily frequented parts of a garden where an appreciation of the surrounding landscape is likely to be fundamental to the enjoyment of the space.

Lower value views from the residential properties might include:

• Views from upper floor windows on principal elevations of the building likely to correspond to bedrooms and study / office rooms;

• Views from front gardens or parts of the curtilage to the building where it is likely that the focus of attention is on an activity such as gardening rather than on the surrounding landscape;

• Views from windows on side elevations and from windows likely to correspond to utility rooms, bathrooms, etc; and

• Views from parts of the garden or building curtilage with a purely functional purpose such as a driveway or storage area, etc or land worked as part of a business.

1.3.8 Overall sensitivity for each receptor is identified by combining the susceptibility to change with the value of each receptor. The magnitude of the effect is determined by combining the professional judgements about the size or scale of the landscape effect, the geographical extent over the area which the effect occurs and its reversibility and its duration.

1.3.9 The GLVIA3 based assessment methodology used for this RVAA is set out in Appendix A of this report.

### RVAA Stage 4

1.3.10 The key difference between RVAA and LVIA is that RVAA focusses on private visual amenity at individual properties whilst LVIA focusses on public amenity and views. The fourth step in the RVAA process requires a further assessment of change to visual amenity to assess whether the Residential Visual Amenity Threshold has been reached.

1.3.11 There is no detailed guidance on how to determine the Residential Visual Amenity Threshold, but LI TGN 2/19 recommends terminology and descriptors that have previously been used. Planning decisions quoted in LI TGN 2/19 use terms such as 'overwhelming', 'oppressive', 'overbearing' and 'unavoidable'[5]. Professional judgement is used to determine whether the proposed development would give rise to such effects in each case.

[5] Landscape Institute's RVAA Technical Guidance Note 2/19

# 2 ASSESSMENT OF BASELINE VISUAL CONDITIONS, AND EFFECTS ON RESIDENTIAL AMENITY

## 2.1 Extent of Study Area

2.1.1 The study area was limited to the areas of the property within the ownership or to which the residents have a right of access such as the driveway. This is well defined and the extent of the house and its gardens set within a wider agricultural setting is illustrated in below.


2.1.2 The location of the new eco-pod home office is indicated by blue star. Farm track with right of access to Caunton Lodge Farm is identified in blue outline

2.1.3 The property is accessed via a private drive providing access to Norwell Woodhouse. The property also enjoys a right of access from the south by track to Mill Lane, Caunton. Views going to and from the property are an assessment consideration in an RVAA but only where views of the proposed development would be experienced. Site assessment identified that this was limited to a short distance along the drive at its approach to the property from Norwell Woodhouse and from the south from Mill Lane, Caunton. The arrival

views travelling from Norwell Woodhouse are illustrated in Viewpoints VP12 and VP13 and are representative of the location where the house, its gardens and the proposed development features might be seen in a single view on arriving at the property. Arriving from the south the open agricultural fields, adjoining the track, are an important element in the setting of the property. The southern access track and its relationship with the property is clearly identified in the photograph below, taken from the dwelling.

2.1.4 A site visit was undertaken by a Chartered Landscape Architect on Monday 23rd March 2026 to identify the extent to which residents at Caunton Lodge Farm are potential visual receptors to the development proposals, and to record views from the house garden and driveway. Viewpoint photographs were recorded to be as representative as feasible of the view from the property.

## 2.2 Description of the residential property

2.2.1 The dwelling consists of a two storey, red brick with pitched roof construction, with older parts of the dwelling dating back approximately 250 years. The building has been assessed to be a non-listed heritage asset.

2.2.2 The dwelling is generally two storey in height with windows on all elevations at ground level and first floor. The layout is generally L shape with the traditional dwelling orientated west to east and a two storey extension orientated north to south, located to the west of the older part of the house. This has created a partly enclosed formal garden close to the house with views strongly focused to the south. Views from the formal garden extend across open lawn to the southern property boundary and beyond.

2.2.3 A glazed conservatory linked directly to the dwelling is located to the south west corner of the dwelling with views to both the south and the west. These views extend across open lawn to the south and west to the property boundaries and beyond.

2.2.4 The formal garden which contains the immediate terrace and outdoor sitting areas is contained by low brick wall with picket fence which does not prevent views from the formal garden into the open area of main lawn that extends to the fence line that defines the southern boundary of the property. A number of mature shrubs are present adjacent to the low wall which partially screen views from the western end of the formal garden. However, the middle and eastern end of the garden, associated with the broader dining terrace is open with clear views over the low wall.

2.2.5 Beyond the formal inner garden is an extensive area of formal lawn to the south and the west of the property. These areas of open lawn extend up to post and rail boundary fencing which defines the extent of the domestic curtilage. An established hedge is located west of the house which demarcates the extent of the domestic curtilage. To the north of the house are outbuildings and driveway with car parking and turning.

2.2.6 To the east of the house is a further area of open garden with ornamental pond. This area contributes to the open setting of the house seen on arrival from the driveway. The openness of the garden includes views towards the south west and across the formal south facing lawn and wider agricultural landscape beyond.

2.2.7 The eastern driveway from Norwell Woodhouse is informal, passing through land in agricultural use. On arriving at the house, the openness of the garden to the east allows the house to be seen in the view so creating a strong sense of arrival. Views from the drive both on approach and at arrival at the property include views into the wider agricultural landscape to the south which makes a notable contribution to the agricultural setting of the property.

2.2.8 The southern access from Mill Lane, Caunton is more open and expansive and open views of the landscape are experienced on approach and leaving the property. The open view towards the property on approach from the south makes a notable contribution to the setting of the property.

## 2.3 Description of views from the property

2.3.1 Please refer to Figures 1 to 37 Appendix B for views and viewpoint locations. Where helpful to understanding the nature of the view, extracts of these figures have been included in the following text.

2.3.2 An internal survey was undertaken to identify windows where potential views of the development features might be seen in full or part. Descriptions of views were recorded along with orientation. Whether the view was a primary or secondary view were also noted. Primary views are associated with main living areas and where the view contributes to the character of the living space. Secondary views are associated with less frequently used areas and where the main purpose of the window is primarily to provide light to the space.

2.3.3 Appendix B Figure 3 and Figure 4 identify windows and doors where views towards the proposed development were identified and confirmed. These views are described below.

2.3.4 Figure 2 Extract showing window locations


2.3.5 Figure 4 Extract showing window locations

Primary Views (From within the dwelling)

2.3.6 W2 Conservatory Window: Traditional lean to glazed conservatory allows ground floor views to south over front lawn. Views extend to post and rail fence at boundary of domestic curtilage and beyond into agricultural landscape to south. (View represented by Viewpoint Photograph 10)

2.3.7 W3 Conservatory Window: Traditional lean to glazed conservatory allows ground floor views to west and south west over front lawn. Views extend to post and rail fence at boundary of domestic curtilage and beyond into agricultural landscape to south. Established hedge defines boundary of domestic curtilage to west of conservatory. This limits views due west into adjoining agricultural landscape. (View represented by Viewpoint Photograph 11)

2.3.8 W5 French Doors (Guest suite): Double opening doors with 'Juliet' balcony provides extensive views to the south, south east and south west from guest suite. View from first floor is elevated and extends over open lawn frontage and wider agricultural landscape. (View represented by Viewpoint Photograph 6)

2.3.9 W6 French Doors (Master Bedroom): Double opening doors with 'Juliet' balcony provides extensive views to the south, south east and south west from master bedroom. View from first floor is elevated and extends over open lawn frontage and wider agricultural landscape. (View represented by Viewpoint Photograph 6)

2.3.10 W12 Terrace Doors (Main Living Room): Main window and access to terrace with extensive views to the south, framed by immediate building layout to the east. The view is over the open area of the inner formal garden area, extending across the lawn to the agricultural landscape beyond. (View represented by Viewpoint Photograph 12)

2.3.11 W13 Ground Floor Window (Lounge): Secondary window but central to living space providing view across garden, open lawn and beyond to agricultural landscape. (View represented by Viewpoint Photograph 13)

2.3.12 W14 French Doors (Lounge): Double doors from living room to inner garden with view to open lawn and beyond into agricultural landscape. View is partial due to established ornamental shrubbery creating some screening. (View represented by Viewpoint Photograph 14)

2.3.13 W15 French Doors (Dining Room/Living Room): Double doors from dining/ living room into garden, open lawn and beyond into agricultural landscape. The view is much more open than window W14. (View represented by Viewpoint Photograph 15)

2.3.14 W16 Ground Floor Window (Kitchen): Ground floor window in kitchen providing a view to the south, framed by extension to the immediate west. The view is partly limited by

established garden vegetation but extends over the open garden to the south and beyond into agricultural landscape to south. (View represented by Viewpoint Photograph 16)

Secondary Views (From within the dwelling)

2.3.15 W1 Ground Floor Window (Living Room): Ground floor window from living area with direct view south over lawn and into agricultural landscape south of domestic curtilage. (View represented by Viewpoint Photograph 5)

2.3.16 W17 First Floor (Bedroom): First floor window with direct and elevated view south over gardens and into agricultural landscape south of domestic curtilage. (Not represented)

2.3.17 W18 First Floor (Bedroom): First floor window with direct and elevated view south over gardens and into agricultural landscape south of domestic curtilage. (Not represented)

2.3.18 A total of 9no. primary windows and 3no. secondary windows are identified to have potential views of proposed development features.

Views from within the domestic curtilage

2.3.19 Inner formal garden: There is an extensive area of paved terrace which has a direct and significant correlation with the ground floor doors within the main living areas of the house. Views from the terrace are open to the south and partly framed by the building form which screens views to the west. Established vegetation partly screens views from western most areas of the terrace. From all other areas there are open views to the south over the lawn in the foreground of the wider agricultural landscape. (View represented by Viewpoint Photographs 1, 2, 3 & 5)

2.3.20 Open Lawn to south: The main lawn to the south of the house extends up to the post and rail fence line which demarcates the extent of the domestic curtilage. Views are unhindered and expansive into the agricultural landscape to the south, south east and south west. (View represented by Viewpoint Photograph 7, 8 & 10)

2.3.21 Open lawn to west: Similar to the open lawn to the south of the house, the lawn is open and extends up to the post and rail fence that demarcates the domestic curtilage of the house. Immediately west of the house the post and rail fence is replaced with established native hedge which the screens views to the west from external areas. Views to the south and south west are open and expansive, extending into the agricultural landscape. (View represented by Viewpoint Photograph 9 &11)

2.3.22 Garden to east of main dwelling: The garden to the east of the dwelling is open and includes an ornamental body of water which all forms part of the open setting experienced on arrival at the property. Views are available to the east and to the south and south west, where the house and its gardens are experienced in the wider setting of the agricultural landscape. (View represented by Viewpoint Photograph 4 and 6)

2.3.23 Driveway from Norwell Woodhouse: On approaching the house there are open views into the agricultural landscape immediately adjoining and to the south of the house. Views to the north are all screened by well established hedges thereby exacerbating the openness of the views to the south and south west. The agricultural landscape is an important element in these views as they provide a strong sense of setting that is particularly relevant to the historic agricultural role of the property and its undesignated heritage asset status. (View represented by Viewpoint Photograph 12 & 13)

2.3.24 Southern access to Mill Lane, Caunton: On approaching the property from the south the track affords a direct view towards the property and passes through the open agricultural fields until reaching the entrance. The view from the track is expansive and open with the house a prominent feature on approaching. This can be seen in the photograph below taken at the point where the southern access track meets the domestic curtilage of the property.

2.3.25 Home Office: Planning approval has been obtained for a home office to be constructed remote from the dwelling and within the main open lawn area to the south of the property. The office will have views into the adjoining agricultural landscape. Given the potential length and period of use and nature of potential direct views into the adjoining landscape, views are assessed to be primary views.

2.3.26 Summary of views: The property is located in an isolated location where it is surrounded by open, agricultural land. The access tracks to the property are open to views into the agricultural landscape at the approach to the property and views on arrival are open and predominately unscreened by field hedges or trees. These views are important to the setting of the property.

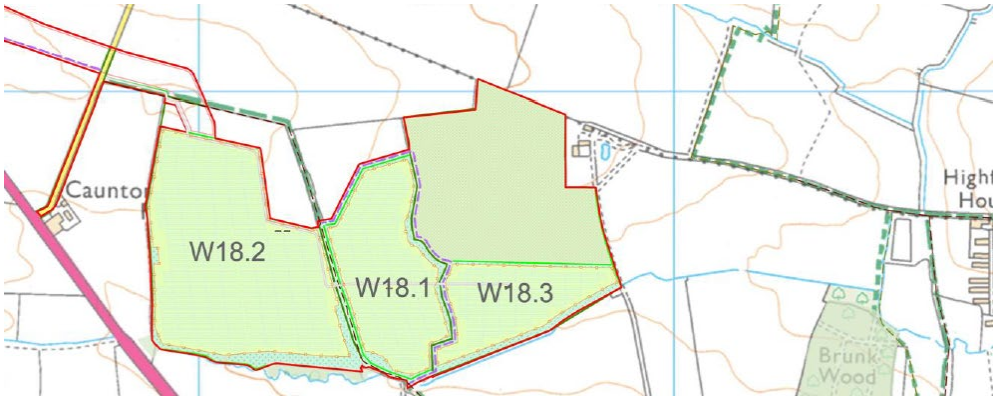
2.3.27 From the house views are open to the south, extending extensively to the south east, south and south west where the open, agricultural landscape forms a significant component of the setting of the property. From inside the dwelling, views are focused at both ground level and first floor, onto this agricultural landscape. As such there is strong visual connectivity between the main internal rooms and the wider landscape setting. This

relationship is fundamental to the distinctive character of the house and its grounds and gardens.

2.3.28 The limited field hedges to the drive on arrival, and garden and grounds along the southern and part western boundaries is also a distinctive feature, due to the openness this creates. This openness facilitating the extensive visual connectivity of the house and grounds with the agricultural setting of the property. It is particularly important to note that the extent of primary views is not limited to the ground floor of the dwelling but includes guest and master bedroom suites due to the double doors and balconies that facilitate views at first floor. Views from the future home office are also assessed to be primary views due to likely length and period of use and potential open views.

## 2.4 Description of development proposals that would be seen from the property.

2.4.1 With reference to Landscape Masterplan Figure 5.2 (5) of the GNR Solar & Biodiversity Park development, proposed solar arrays in areas W18.1 and W18.3 are to be located within a distance of 250 metres of the property. These are shown in the extract from the Landscape Masterplan below.




2.4.2 Proposed solar array area W18.1 is located west of the property and within an agricultural field separated by established hedge. Proposed solar array area W18.3 is located directly south of the property within open farmland that extends up to the post and rail fence boundary of the domestic curtilage. Whilst there is potential for solar arrays of up to 4m in

height to be seen in area W18.1, it is proposed area W18.3 that has the greatest potential to create a significant change to views from the property.

2.4.3 Landscape Masterplan Figure 5.2 (5) proposes a new hedgerow to be planted along the northern boundary of solar array area W18.3 where presently there is no field boundary with the remainder of the field which is proposed to be retained in arable agricultural land use.

2.4.4 Whilst the proposed hedgerow will, in time establish a new field boundary, the extent to which it will screen views from the house and gardens will be limited by a combination of the following:

- Period of establishment to achieve a screening hedge of height greater than 4m.
- Existing direct open views from the garden at a height of approximately 47m AOD, some 7m above the ground level along the northern edge of the solar arrays in W18.3 at approximately 40m AOD.
- Elevated views from first floor windows with direct views to the south from both the main building and western extension.

2.4.5 In addition to the proposed solar arrays, other elements of the development will be potentially visible including:

- Secure perimeter fencing
- Pole mounted CCTV

2.4.6 It is assessed that development features such as solar arrays, boundary fencing and pole mounted CCTV will be generally visible in proposed development areas as follows:

a. Ground floor west facing windows – Development areas W18.1 and W18.3
b. Ground floor south facing windows – Development areas W18.1 and W18.3
c. First floor south facing windows – Development Area W18.3
d. Inner terrace garden – Development Area W18.3

e. South lawn – Development Areas W18.1 and W18.3

f. West lawn – Development Areas W18.1 and W18.3

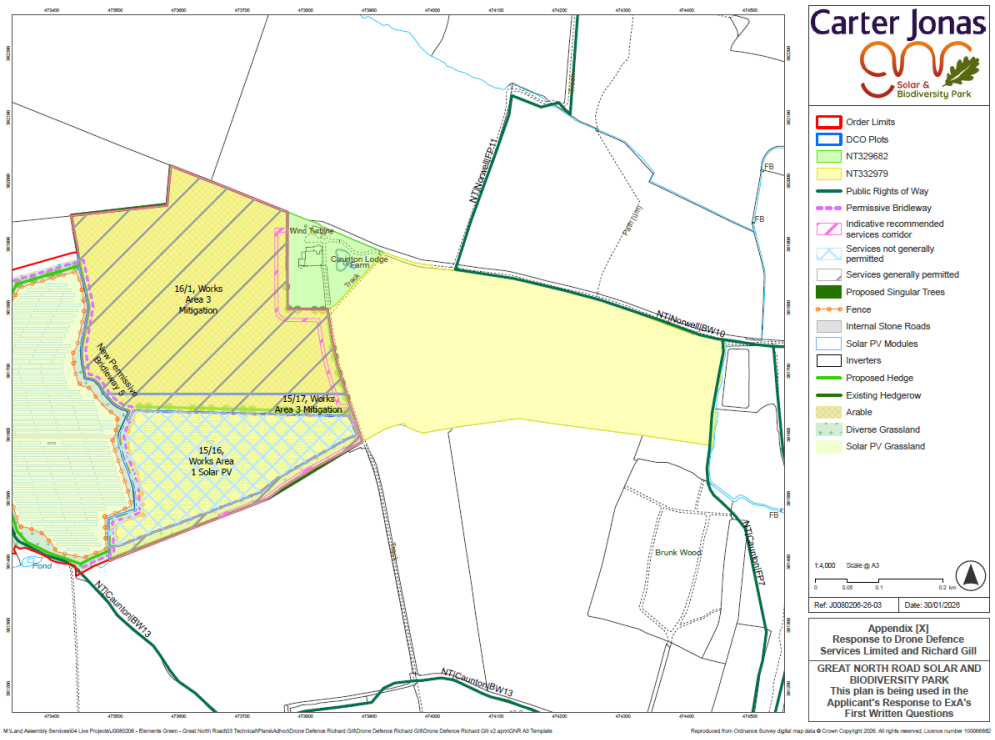
g. East lawn and arrival area – Development Area W18.3

h. Driveway - Development Area W18.3

2.4.7 The most visually prominent area of proposed development in relations to views from the house is development area W18.3.

2.4.8 From external areas proposed development area W18.3 will also be the most visually prominent. Proposed development area W18.1 is likely to be seen above intervening field hedge from open areas of the garden south of the house.

2.4.9 It is also noted that on the plan provided in response to Drone Defence Services Limited and Richard Gill, that new hedge and tree planting is proposed along the southern access track to Caunton Lodge Farm, along the southern boundary of the property and along part of the western boundary. The nature of this proposed mitigation is unclear in the key and could in its own right result in further loss of openness and views enjoyed by the property. The plan is reproduced below.



2.4.10 The above plan also identifies that walkers using the public right of way (Norwell FP11) located to the east of the property, will be visual receptors of development proposals within development area W18.3. Walkers heading west or south at the access drive to Caunton Lodge Farm will experience similar views to those accessing the property. This is confirmed in the Applicants LVIA where local footpath users identified as 'Group D Between Kneesall, Caunton and Ossington Airfield' are assessed to experience medium scale changes in views, resulting in major/ moderate adverse and significant effects.

## 2.5 Visual Assessment

2.5.1 The baseline assessment detailed above directly informs the assessment of visual effects which are set out below. These identify potential visual effects at the following stages:

- Construction Phase
- Operational Phase Year One
- Operational Phase Post Year 10
- Decommissioning Phase

2.5.2 Please refer to Table 1 below for assessment of predicted visual effects.

| TABLE 1 Visual Effects | | | | | |
|---|---|---|---|---|---|
| Property Address | Approximate distance to Site (From building) | Orientation of main frontage | Main orientation of views towards site | Baseline visual amenity | Mitigation measures<br><br>(Inherent and Proposed) |
| Caunton Lodge Farm | 240m | South | South | Two storey farmhouse with south facing aspect to main living rooms and gardens. The dwelling is assessed to have 9no. primary windows and 3no. secondary windows which have confirmed views of development areas W18.3 (south of property) and W18.1 (west of property).<br><br>Primary windows relate to main living areas, guest suite and master bedroom. In particular the first floor guest suite and master bedroom have double French doors with Juliet balconies with important correlation to the gardens and the agricultural landscape to the south in which they are seen.<br><br>The house is registered as a non-listed heritage asset. The origins of the house are associated with the historic farming land use. As such the visual association of the house with its agricultural setting is an important correlation.<br><br>Views from both the dwelling primary windows and secondary windows are open and extend to the agricultural landscape beyond the gardens within the domestic curtilage. | Limited inherent mitigation as farmhouse and gardens are characterised by an open agricultural setting with only post and rail boundary fence between the domestic curtilage and proposed development area W18.3.<br><br>New native hedge planting is proposed along the northern boundary of proposed development area W18.3. The hedge creates a new field boundary in response to the division of the existing arable field into part solar arrays and part future ecological mitigation area.<br><br>There is a suggestion in the plan submitted in response to Drone Defence and Richard Gill comments, that further hedge and tree planting is proposed along the southern access track and the southern and western boundaries of the garden. This is likely to exacerbate further loss of views and agricultural openness currently enjoyed by the property. |

| | | | | | |
|---|---|---|---|---|---|
| | | | | Views from the gardens and driveway are open and extensive, extending across the gardens into the wider agricultural landscape. | |

| *Table Cont.*<br><br>Sensitivity | Magnitude of Change | Threshold for Visual Residential Visual Amenity |
|---|---|---|
| Primary Windows<br><br>Medium value + high susceptibility = Medium High sensitivity<br><br>Secondary Windows and Curtilage<br><br>Low value + high susceptibility = Medium sensitivity<br><br>Property access from the east and south<br><br>Medium value + high susceptibility = Medium High sensitivity | Primary windows<br>Medium- High Sensitivity<br>- Construction phase activities would be visually prominent and unscreened in all views resulting in a medium high magnitude of change.<br><br>- At year one operational phase solar arrays and security fencing would be seen in views from primary windows to the south east, south and south west. The rear of the arrays will be seen extending across the entire middle ground landscape to a height of approximately 4m resulting in a medium high magnitude of change.<br><br>- Native hedge planting will become established in 10 to 15 years but will in itself result in loss of views and openness currently enjoyed by the property.<br><br>- At decommissioning phase, the hedge planted at operational year one is assumed to be permanent so partially screening decommissioning activities. As a result, the magnitude of change is assessed to be low | Visual Harm to views from primary windows is assessed as:<br><br>- Construction phase - Major Adverse Harm (Temporary)<br><br>- Year One operation phase – Major Adverse<br><br>- Operational Phase Year 10/ 15yrs+ - Major Adverse<br><br>- Decommissioning Phase – Minor Adverse<br><br>Visual Harm to views from secondary windows is assessed as:<br><br>- Construction phase - Major Moderate Adverse Harm (Temporary)<br><br>- Year One operation phase – Major Moderate Adverse |

| | | |
|---|---|---|
| | Secondary Windows<br>Medium Sensitivity<br>- Construction phase activities would be visually prominent and unscreened in all views resulting in a medium high magnitude of change.<br>- At year one operational phase solar arrays and security fencing would be seen in views from secondary windows to the south east, south and south west. The rear of the arrays will be seen extending across the entire middle ground landscape to a height of approximately 4m resulting in a medium high magnitude of change.<br>- Native hedge planting will become established in 10 to 15 years but will in itself result in loss of views and openness currently enjoyed by the property.<br>- At decommissioning phase, the hedge planted at operational year one is assumed to be permanent so partially screening decommissioning activities. As a result, the magnitude of change is assessed to be low<br><br>External Curtilage<br>Medium Sensitivity<br>- Construction phase activities would be visually prominent in views from the gardens and ground particularly within the southern area of lawn closest to development area W18.3.<br>- At year one operational phase solar arrays and security fencing would be seen in views to the south resulting in a high to medium high magnitude of change.<br>- Native hedge planting will become established in 10 to 15 years but will in itself result in loss of views and openness currently enjoyed from the garden areas. | - Operational Phase Year 10/15 yrs+ - Moderate Adverse<br>- Decommissioning Phase – Minor Adverse<br><br>Visual Harm to views from curtilage is assessed as:<br>- Construction phase - Moderate Adverse Harm (Temporary)<br>- Year One operation phase – Moderate Adverse<br>- Operational Phase Year 10+ - Minor Moderate Adverse<br>- Decommissioning Phase – Minor Adverse<br><br>Visual Harm to views from the eastern and southern access tracks to the property is assessed as:<br>- Construction phase - Major Adverse Harm (Temporary)<br>- Year One operation phase – Major Adverse<br>- Operational Phase Year 10/15 yrs+ - Major Adverse<br><br>Decommissioning Phase – Minor Adverse |

| | | |
|---|---|---|
| | - Potential effects at year 1 operational phase will be large in scale due to the close proximity. This is predicted to result in a large scale change and very major adverse effect until mitigation measures have established within 10 to 15 years.<br><br>- At decommissioning phase, the hedge planted at operational year one is assumed to be permanent so partially screening decommissioning activities. As a result, the magnitude of change is assessed to be low<br><br>Access drives from Norwell Woodhouse and Caunton<br>Medium High Sensitivity<br>- Construction phase activities would be visually prominent in views to the south west from the eastern access track and immediately adjacent in views from the southern access track. These views would be only partially screened from the eastern driveway and not at all from the southern access track resulting in a high to medium high magnitude of change.<br><br>- At year one operational phase solar arrays and security fencing would be seen in views to the south west and adjacent to the southern access track, resulting in a high to medium high magnitude of change.<br><br>- Native hedge planting will become established in 10 to 15 years but will in itself result in loss of views and openness currently enjoyed on approaching and leaving the property.<br>- Potential effects at year 1 operations phase will be very large in scale due the proposals immediately adjoining the access track from the south. This is predicted to result in a very large scale change and very major adverse effect until mitigation measures have established within 10 to 15 years.<br><br>- At decommissioning phase, the hedge planted at operational year one is assumed to be permanent so partially screening decommissioning activities. As a result, the magnitude of change is assessed to be low | |

# 3 EXISTING ASSESSMENT

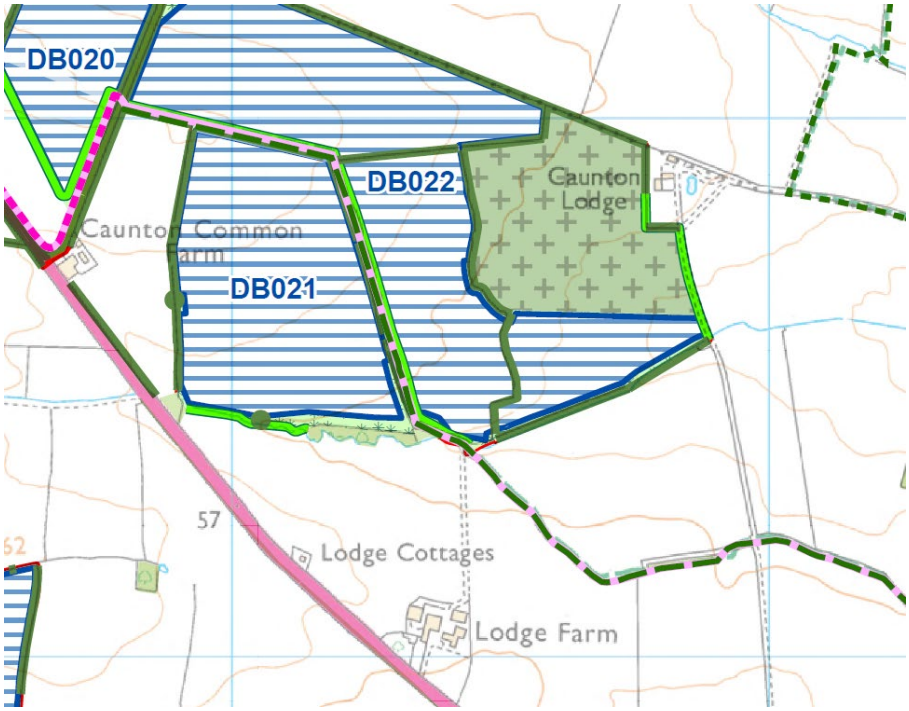
3.1.1 The GNR Solar and Biodiversity Park – Technical Appendix A7.6 Residential Visual Amenity Assessment includes an assessment of Caunton Lodge Farm. The property is referenced as R27: Caunton Lodge Farm and the assessment originally prepared in November 2024. The assessment is reproduced below and identifies a 'Major Adverse' level of effect arising from the development proposals.

3.1.2 Extract from November 2024 RVAA for Caunton Lodge Farm

| | | |
|---|---|---|
| R27<br>Caunton Lodge Farm<br>(240m south and west)<br>See Sheet 5 for location | Caunton Lodge Farm is a large two-storey property accessed via private tracks. The property is set within a large, open garden that has hedgerows along the northern boundary and half of the western boundary. It has a small number of outbuildings and scattered trees. The primary aspects of the property face north and south, with the main outlook being to the south and southwest.<br>There would be open views across the adjacent ecological mitigation area, towards the solar panels to the south and southwest from the access to the house, outer garden and windows in the south-facing gable end. Views from the main south-facing façade and small formal garden directly south of the house would be filtered through garden vegetation, but still relatively open, particularly in winter. The solar area would be on ground which gently slopes towards the property which would have the effect of making the Development appear slightly closer. Large/medium scale changes to views would arise for a Wide extent of the property.<br>Preliminary RVAA Judgement: During all stages of the Development the magnitude of effects would be below the highest level of magnitude and effects would not reach the RVA threshold. | Magnitude:<br>Large/medium<br><br>Level of Effect<br>Major, Adverse<br><br>Assess at EIA Stage:<br>Yes |

3.1.3 The RVAA for Caunton Lodge Farm was undertaken as a desktop assessment and would have relied on baseline information that included the PEIR Stage Masterplan (Figure 5.2). This plan was dated 11/11/24 and was therefore current at the time that the RVAA was undertaken. It should be noted that the plan identified an existing hedge along the southern boundary of the property which was not actually in existence at that time. An extract from the masterplan Figure 5.2 Detail Sheet 3 identifies the extent of incorrectly identified hedge along the southern boundary of the property.

3.1.4 Extract from Figure 5.2 Detail Sheet 3




3.1.5 The key for the above plan extract is provided separately below.

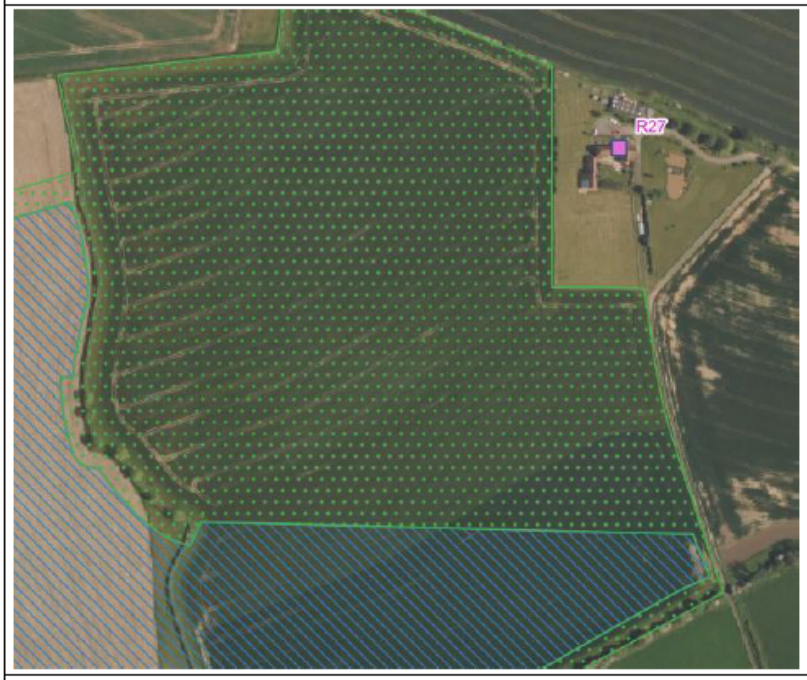
**Landscape & Ecology**

- Existing Hedgerows
- Proposed Hedgerows
- Existing Woodland (OS data)
- Proposed Woodland
- Proposed Hedge and Tree Belt
- Retained Agricultural Land - enhanced ecological management
- Proposed Permanent Grassland
- Proposed Green Corridor
- Proposed Riparian Corridor
- Proposed Wildlife Site
- Proposed Community Orchard
- Proposed Grassland (PV areas) - species diverse
- Existing Waterbody
- Proposed Pond/Scrape
- Target area for ecological enhancement

3.1.6 The November 2024 masterplan suggests that the baseline against which the proposals were being assessed was incorrect at that time.

3.1.7 Technical Appendix A7.6 Residential Visual Amenity assessment was updated in June 2025 and is provided in extract below.

**R27: Caunton Lodge Farm (240 m)**




Caunton Lodge Farm is a large two-storey property accessed via private tracks. The property is set within a large, open garden that has hedgerows along the northern boundary and half of the western boundary. It has a small number of outbuildings and scattered trees. The primary aspects of the property face north and south, with the main outlook being to the south and southwest.

There would be open views across the adjacent ecological mitigation area (Work Area No. 3), towards the solar panels to the south and southwest from the access to the house, outer garden and windows in the south-facing gable end. Views from the main south-facing façade and small formal garden directly south of the house would be filtered through garden vegetation, but still relatively open, particularly in winter. The solar area would be on ground which gently slopes towards the property which would have the effect of making the Development appear slightly closer, particularly before the proposed hedge along the north side of the panel area matures. Large/medium scale changes to views would arise for a Wide extent of the property during all stages prior to decommissioning. After decommissioning, effects would be Negligible.

Magnitude: Large/medium, Level of Effect: Major, Adverse

RVAA Judgement: During all stages of the Development the magnitude of effects would be below the highest level of magnitude and effects would not reach the RVA threshold.

3.1.8 It can be seen that the description of the property and assessment was carried through from the November 2024 version to the updated version published in June 2025. The incorrect baseline information is therefore likely to have been carried through as no change to the assessment outcome of 'Major Adverse' was made.

3.1.9 In addition to the above potential incorrect assessment of the baseline, the description of views and extent to which development proposals would be seen are in summary. This appears to downplay the extent to which development proposals would be seen to be very

prominent from primary living rooms and in particular south facing balconies to first floor accommodation. Similarly, the south and western lawns are an integral part of the property where current views are unhindered of the immediate and wider agricultural landscape. The new home office would also not have been taken into consideration in this location on the southern lawn. The extent to which views from these lawns (and home office) will be directly impacted by development features and associated level of magnitude of change has not been mentioned in the summary. This appears to be an omission from the published RVAA. The overall magnitude of change that would be experienced is assessed to be Large/ medium and the level of effect assessed to be Major adverse.

3.1.10 The published assessment makes the RVAA judgement that '*Below all stages of the Development the magnitude of effects would be below the highest level of magnitude and effects would not reach the RVA threshold.*'

3.1.11 This may be technically correct at a stage of 10 to 15 years post operational phase when mitigation measures are established sufficiently, but the approach set out in A7.6.2.2 of the published assessment notes that the four step process to RVAA, fall broadly within the scope of LVIA. It states that the same general approach as that of the LVIA is taken including drawing on its findings. However, the approach taken with an LVIA is to identify the magnitude of change and resulting level of visual effect. It does not result in a pass or fail approach required of RVAA but seeks to introduce mitigation measures or changes to avoid or reduce identified significant effects. The assessment of a major adverse visual effect arising from a large/ medium magnitude of change identifies significant visual harm to residential amenity at the property. In the context of the approach taken by LVIA further changes to the design proposals or mitigation should be considered. The assessment of a major adverse harm to residential visual amenity should not be considered acceptable because it falls just short of the very worst assessment outcomes.

3.1.12 Indeed, in the first 10 to 15 years of the operation stage of the development, harm is likely to exceed major adverse, as mitigation measures will not be sufficiently established. Visual effects will be particularly overbearing from areas within the domestic curtilage to the south

of the property and from the southern access track which immediately adjoins the current development proposals. During this lengthy period in the lifespan of the development, it would not be unreasonable to assess that the effects on residential visual amenity would not be below the highest level of magnitude of effects so reach the RVA threshold for unacceptable harm.

Hierarchy of Mitigation

3.1.13 Guidelines for Landscape and Visual Impact Assessment 3rd Edition requires mitigation not to be treated as an afterthought but as an integral and iterative part of the design and assessment process. The guidance clearly sets out a hierarchy of mitigation which should be applied in order, starting as early as possible in project conception and design. GLVIA3 expresses mitigation as a progressive hierarchy that prioritises preventing effects before trying to soften them. The hierarchy is commonly summarised as:

1. Avoid
2. Reduce
3. Remedy (or rectify)
4. Compensate/ offset

3.1.14 GLVIA3 emphasises that mitigation should be embedded in design evolution rather than tacked on later. As such 'Avoidance' is identified as the most important and most effective form of mitigation in GLVIA3. Avoidance involves:

- Choosing locations, layouts, scales or design options that prevent adverse landscape or visual effects from occurring at all;
- Avoiding particularly sensitive landscapes, features or viewpoints, or avoiding intrusion into key landscape characteristics.

3.1.15 In summary, GLVIA3's hierarchy of mitigation prioritises good site selection and design first, with planting and compensatory measures firmly positioned as secondary or last resort measures. Decision makers are expected to see evidence that adverse effects have been

avoided or reduced at source, not simply masked. GLVIA3 aligns with the legal mitigation hierarchy set out in the EIA Regulations which require the ES to include:

*'A description of the measures envisaged to avoid, prevent, reduce or, if possible, offset any identified significant adverse effects on the environment.'*

3.1.16 The Design Approach Document (EN010162/APP/5.6B) Revision 3 dated January 2026 sets out a number of examples where an iterative design approach has been used to address mitigation including relocation of solar arrays away from residential properties. The document presents the iterative design process that delivers the hierarchy of mitigation in accordance with EIA Regulations. Paragraph 5.2.1.2 Design Changes near Norwell Woodhouse records the process including the approach to mitigation at Caunton Lodge Farm. The extract below sets out the design actives which are illustrated on the plan extract.

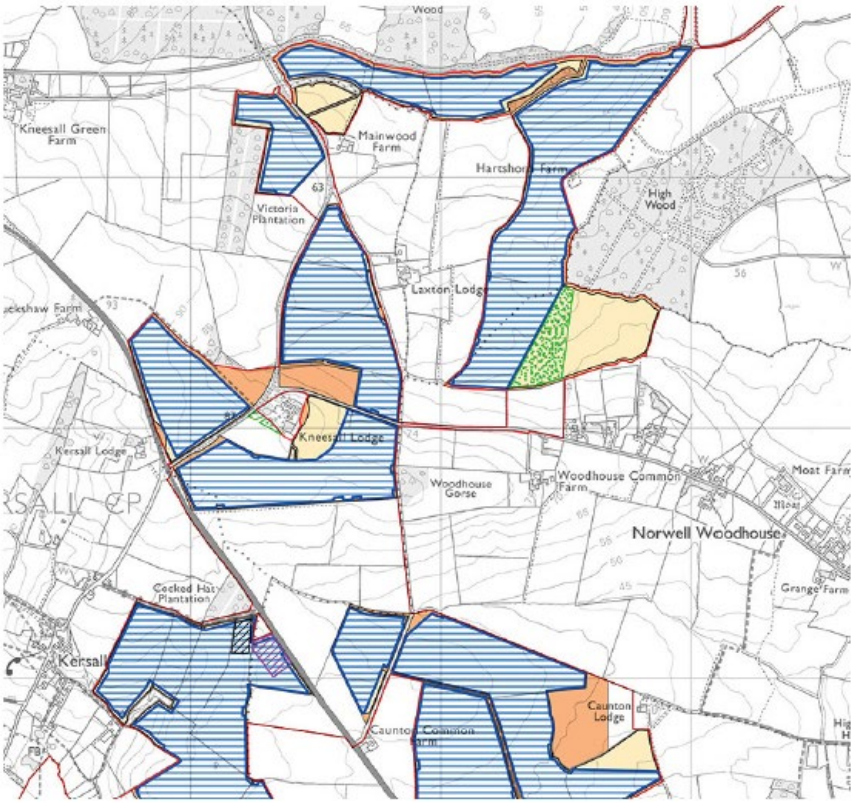
**5.2.1.2** ***Design Changes near Norwell Woodhouse***

63 Between Scoping and the Preliminary Masterplan:

- Set back of solar areas from residential properties, to the west and southwest of the properties at Caunton Lodge and north of Kneesall Lodge.

64 Between Preliminary Masterplan and PEIR:

- Removal of one of the two potential areas for the Lime Lane intermediate substation to reduce visibility from the A616.
- Removal of solar panels south of High Wood from slopes facing towards Norwell Woodhouse and new woodland in the area to screen panels further west.
- Further set back of solar area to south of property at Caunton Lodge and removal of panel areas north of Mainwood Farm and east and southeast of Kneesall Lodge in response to comments from householders during consultation in relation to visual amenity.




3.1.17 It can be seen that when applied correctly, the approach to mitigation 'avoids' potential adverse effects such as predicted at Mainwood Farm and Kneesall Lodge. This was achieved through the removal of solar arrays originally proposed at scoping and preliminary masterplan stages. However, at Caunton Lodge Farm the design was adjusted but this adjustment did not address the nature of the harm or reduce the level of harm to residential amenity to less than major adverse. Visual harm was not avoided even with the introduction of secondary mitigation measures including hedge and tree planting.

3.1.18 Ineffective mitigation is also identified adjoining the property with regard to Caunton Bridleway 13. The current bridleway passes through proposed development area W18.1 but it is proposed to create a permissive bridleway to avoid passing directly along a narrow channel through solar arrays. However, the proposed permissive bridleway still has to pass through a narrow channel within solar arrays in development area W18.3. The mitigation measure is not effective because the potential effect of anxiety to horse riders and their animals will remain as they traverse an otherwise open bridle way into development area W18.3.

3.1.19 The Design Approach Document confirms that with regard to residential visual amenity at Caunton Lodge Farm, the most important aspect of mitigation, that being 'avoidance' has not be consistently applied resulting in a residual major adverse visual harm at every stage of the development up to decommissioning.

# 4 CONCLUSION

4.1.1 Caunton Lodge Farm is a rural property, recognised as being an unlisted heritage asset and having a strong correlation with the immediate agricultural land use. The property and its gardens and driveway are contained within the agricultural landscape which makes a significant contribution to character and appearance and the overall rural setting of the property.

4.1.2 The introduction of development proposals to areas W18.1 and W18.3 through the GNR Solar and Biodiversity Park scheme will result in change to the character and appearance of the landscape, resulting in significant harm to the residential visual amenity.

4.1.3 This assessment identifies 9no. primary windows and 3no. secondary windows from where views of the proposed development will be seen. The assessment of visual harm arising from the changes to the views from primary windows has been assessed to be significant at all stages other than decommissioning.

4.1.4 The assessment of visual harm arising from the changes to the views from secondary windows has been assessed to be significant at all stages other than decommissioning.

4.1.5 This assessment has also considered views from external areas within the domestic curtilage and from the access drives from the east and from the south. The assessment of visual harm arising from the changes to the views from external areas and accesses has been assessed to be significant at all stages other than decommissioning. Prior to the establish of mitigation planting, the harm to visual amenity arising in views from the southern access and nearest garden areas is assessed to be large scale and result in a very major adverse and significant harm. This is due to the over bearing closeness of the proposed development to southern drive.

4.1.6 The harm identified to views from primary and secondary windows and from external areas of the property, arises from a large to medium magnitude of change, primarily arising from the introduction of solar arrays and fencing within development area W18.3. That is, due south of the property and where views from windows at both ground and first floor are primarily focused.

4.1.7 The RVAA undertaken as part of the GNR Solar and Biodiversity Park Environmental Statement also assessed a major adverse visual effect arising from a large to medium magnitude of change to the landscape that informs the setting of the house. The published assessment concludes that during all stages of the development, the magnitude of effects would be below the highest level of magnitude and effects would not reach the RVA threshold. However, the baseline assessment appears to be incorrect due to the assumption of an existing hedgerow shown in the Pier Masterplan current at the time of the original RVAA. The updated RVAA of June 2025 simply repeats the description and assessment made in November 2024. There is no recognition of the potential large scale and very major adverse and significant harm arising from the over bearing closeness of the proposed development to southern drive, prior to establishment of any mitigation measures.

4.1.8 The methodology and requirements of the RVAA process results in a 'pass or fail' process and in this regard the outcome of the published assessment (major adverse) is not disputed. However, this threshold is a very high bar, and a major adverse effect is significant visual harm particularly where the property has such a strong historical and visual correlation with the agricultural landscape that forms its setting. It is also relevant that greater visual harm will arise before mitigation measures are successfully established. This is due to the overbearing closeness of the development proposals in W18.3 to the southern garden area areas and the access drive from Caunton.

4.1.9 The significant level of visual harm, identified by both the published assessment and this assessment undermines the acceptability of the scheme as it presently stands. In particular proposed development area W18.3 is identified to be almost singularly responsible for

harm to primary and secondary views from the dwelling and external views from the inner terrace garden. This is due to the location of W18.3 directly south of the dwelling and its gardens where views directly focus onto this adjacent and visually prominent landscape.

4.1.10 The overbearing and intrusive effects arising from the development of area W18.3 will not be limited to the occupiers and visitors to Caunton Lodge Farm but will also be experienced by walkers using public right of way Norwell FP11 and horse riders using the proposed permissive bridleway through development area W18.3. Both of these add further weight to the need to remove area W18.3 from the development proposals.

4.1.11 This assessment concludes that the current scheme with particular focus on development area W18.3, is not acceptable due to significant visual effects assessed and that further changes should be made to the proposals to avoid these effects. GLVIA3 is clear on the hierarchy of mitigation and stresses the importance of avoidance as the most important and effective form of mitigation. Whilst the Design Approach Document sets out the interactive design process it clearly illustrates that this guidance has not been consistently applied resulting in a residual major adverse visual effect that could have been avoided by the removal or redesign of proposed solar panels immediately south of the property in development area W18.3.

# 5 APPENDIX A – ASSESSMENT METHODOLOGY

## 5.1 Assessment Guidelines

5.1.1 The assessment of potential effects on landscape receptors is set out below for each confirmed landscape receptor.

5.1.2 The methodology used to identify and assess the landscape and visual effects of proposed development and their scale is based on the following recognised guidance:

- Guidelines for Landscape and Visual Impact Assessment (3rd edition) – Landscape Institute/IEMA (2013)
- Landscape Institute Technical Guidance Note 06/19 – Visual Representation of Development Proposals – Landscape Institute (2019)
- Landscape Institute Technical Guidance Note 02/ 21 Assessing landscape value outside national designations;
- GLVIA Statements of Clarification 1/13 – Landscape Institute website
- An Approach to Landscape Character Assessment – Natural England October 2014

## 5.2 LVIA Methodology

5.2.1 The Landscape and Visual Impact Assessment is a tool used to identify and assess the effects of change resulting from a proposed development on the landscape as a resource, and people's views and visual amenity. It is an iterative process intended to inform design decisions so that new development can avoid or reduce notable negative (adverse) effects on the landscape and visual environment.

5.2.2 It is recognised as important to draw distinctions between landscape and visual effects during the assessment; treating them independently although related. GLVIA sets out the recommended process for assessing the scale of effects by comparing the sensitivity of the

visual or landscape receptor with the magnitude of change resulting from proposed development.

5.2.3 The GLVIA states that the assessment should cover the following stages:

- Project description: description of the proposed development for the purpose of assessment; main features of proposals and establish parameters
- Baseline studies: establishes existing nature of landscape and visual environment in the study area, includes information of the value attached to different resources
- Identification and description of effects that are likely to occur, including whether they are adverse or beneficial
- Assess scale of effects: systematic assessment of the likely scale of the effects identified
- Mitigation: proposes measures designed to avoid/prevent, reduce or offset (or compensate for) any notable negative (adverse) effects

Method of Desk Study

5.2.4 Assessment of Ordnance Survey map data, aerial photographs, landscape designations and landscape planning policies are undertaken at the outset to inform the extent of the study area and identify sensitive visual receptors and likely sensitivity of the landscape. Liaison with the Local Planning Authority landscape officer is also undertaken to agree landscape resources and visual receptors of potential sensitivity to be included within the assessment.

Method of Field Work

5.2.5 Site surveys are undertaken by at least one chartered landscape architect. Visual and landscape receptors are checked and refined initially from the study site. Visual receptors are then visited from the nearest publicly accessible location, to select the most suitable and representative viewpoint. Assessment is undertaken on site; locations and notes recorded on maps and photographs taken from viewpoints. Photographs are taken using a digital SLR set to the equivalent of a 50mm SLR lens; which best represents the view experienced by the human eye.

## 5.3 Method for Assessing Landscape

Landscape Character and Characterisation

5.3.1 Landscape Character Assessment Guidance defines 'landscape' as consisting of the following elements:

- Natural: geology, landform, air and climate, soils, flora and fauna
- Cultural/Social: land use, settlement, enclosure
- Perceptual and Aesthetic: memories, associations, preferences, touch and feel, smells, sounds and sight

5.3.2 Landscape Character Assessment Guidance encourages assessment at different scales that fit together as a hierarchy of landscape character areas and types so that each level can provide more detail to the one above. Identifying the existing landscape character is part of establishing the baseline conditions of a study site and its study area.

National Character Assessment
Establishes broad pattern of the landscape of the wider countryside
↓
District Character Assessment
Establishes pattern of the landscape of the district/county countryside
↓
Local Character Assessment
Establishes pattern of the landscape at a local level
↓
Site elements and features
Establishes landscape resources on the site, such as trees, hedges, etc.

Value of the landscape receptor

5.3.3 Value can apply to areas of landscape as a whole, or to the individual elements, features and aesthetic or perceptual dimensions which contribute to the character of the landscape. Value is determined by some or all of the following aspects:

- Importance applied to landscape by designation or planning policy and the level of this importance in terms of local, regional or national importance

- The views of the local consultees, including the local planning authority, members of the public, special interest groups such as Parish Council, wildlife or walking groups
- The rarity, importance and condition of the landscape resource as judged objectively by the landscape professional.

5.3.4 International and Nationally designated landscapes tend to be of the highest value, locally designated landscapes are most likely to be of moderate value and undesignated landscapes can either be of lower to moderate value depending on an assessment taking into account the following factors:

- Condition of the local landscape
- Scenic quality
- Rarity
- Representativeness
- Conservation interests
- Recreation value
- Perceptual aspects
- Associations

5.3.5 The definitions of value used are as follows:

- Very High: such as World Heritage Sites
- High: such as National Parks, AONB, Conservation Areas, Listed Buildings
- Medium: such as Special Landscape Areas, Areas of Great Landscape Value, several protected features such as Tree Preservation Orders, site may be mentioned in literature, art, tourism or in district/county landscape character assessments or sensitivity assessments
- Medium Low: generally undesignated, may have value at a community level by tourism, literature, art, village greens or allotments, may have a small number of protected features
- Low: no designated features or landscape, limited value, no protected features

Susceptibility of the landscape receptor to the proposed change

5.3.6 This relates to the ability of the landscape receptor (whether it be the overall character or quality/condition of a particular landscape type or area, or an individual element and/or feature, or a particular aesthetic and perceptual aspect) to accommodate the proposed development without undue consequences for the maintenance of the baseline situation and/or the achievement of the of landscape planning policies.

5.3.7 The definitions of susceptibility of the proposed change to landscape used are as follows:

- High: elements, features or whole landscapes that are susceptible to change, with limited opportunities to accommodate change based on the strength of the existing landform, pattern, land cover, settlement pattern, sense of enclosure, visual context, tranquillity
- Medium: elements, features or whole landscapes that are partially susceptible to change, with some opportunities to accommodate change based on the strength of the existing landform, pattern, land cover, settlement pattern, sense of enclosure, visual context, tranquillity
- Low: elements, features or whole landscapes that have limited susceptibility to change, with opportunities to accommodate change based on the strength of the existing landform, land use pattern, land cover, settlement pattern, sense of enclosure, visual context, tranquillity

Definition of Landscape Sensitivity

5.3.8 Landscape sensitivity is determined by combining judgements of the susceptibility to the proposed change and the value of the receptor. Refer to Table A.

| Table A: Definition of Landscape Sensitivity: | |
|---|---|
| Sensitivity | Definition |
| High | - High susceptibility to proposed change<br>- May be a designated landscape valued at a National or International level |

| | |
|---|---|
| | - Landscape characteristics are vulnerable and unable to accommodate change<br>- Development may result in notable changes to landscape character |
| Medium-High | - Medium or high susceptibility to proposed change<br>- May be a designated landscape valued at a local or national level<br>- Landscape characteristics are vulnerable with limited ability to accommodate change<br>- Development may result in moderate changes to landscape character |
| Medium | - Medium susceptibility to proposed change<br>- Some designated features and/or valued at a local level<br>- Landscape characteristics are able to accommodate some change<br>- Development may not result in notable changes to landscape character |
| Medium-Low | - Low or medium susceptibility to proposed change<br>- Likely to be an undesignated landscape but possibly some designated features and/or valued at a local level<br>- Landscape characteristics are resilient to accommodating change<br>- Development may not result in notable changes to landscape character |
| Low | - Low susceptibility to proposed change<br>- Undesignated landscape and/or valued at a community level<br>- Landscape characteristics are robust and able to accommodate change<br>- Development may not result in notable changes to landscape character |
| Negligible | - No susceptibility to proposed change<br>- Undesignated, valued at a site level<br>- Landscape characteristics that are degraded or discordant with landscape character<br>- Development may result in an improvement to landscape character |

Landscape Receptor – Overall Magnitude of Effect

5.3.9 The magnitude of the effect is determined by combining the professional judgements about the size or scale of the landscape effect, the geographical extent over the area which the effect occurs, its reversibility and its duration. Refer to Table B:

- The scale of the effect – for example, whether there is complete loss of a particular element/feature/characteristic or partial loss or no loss; proportion of key elements or features of the baseline that will be lost, the value/importance of these elements to the

landscape character and the degree of contrast between the development and the landscape character

- The geographical extent of the area affected relative to the receptor; this will range from the site itself, a short distance comprising the immediate local area, a medium distance comprising the local and middle landscape and long distance comprising the wider landscape
- The duration of the effect; 0-1 year for the construction period is considered short-term duration, 1-10 years for mitigation to establish is considered medium-term duration, 10 years and beyond is considered long-term duration
- Reversibility; the extent to which the development could be removed and the land reinstated. Reversible and temporary development would include solar farms and wind turbines. Other development such as housing would be considered irreversible and permanent

| Table B: Definition of Landscape Magnitude of Change: | |
|---|---|
| Magnitude of Change: | Definition: |
| High | Very major loss of landscape elements of the landscape, and/or the lost elements make a major contribution to landscape character, and/or change affects a large geographical area, and/or the development introduces a dominating and contrasting characteristic to the landscape |
| Medium-High | Major loss of landscape elements of the landscape, and/or the lost elements make a large contribution to landscape character, and/or change affects a moderate to large geographical area, and/or the development introduces a prominent and partially uncharacteristic feature to the landscape |
| Medium | Moderate loss of landscape elements of the landscape, and/or the lost elements make a moderate contribution to landscape character, and/or change affects a moderate geographical area, and/or the development becomes an identifiable feature but not wholly uncharacteristic to the landscape |
| Medium-Low | Partial loss of landscape elements of the landscape, and/or the lost elements make a moderate to small contribution to landscape character, and/or change affects a small to moderate geographical area, and/or the development is perceptible but not wholly uncharacteristic to the landscape |
| Low | Minor loss of landscape elements of the landscape, and/or the lost elements make a small contribution to landscape character, and/or change |

| | |
|---|---|
| | affects a small geographical area, and/or the development introduces elements not uncharacteristic to the landscape |
| Negligible | Negligible or no loss of landscape elements of the landscape, and/or the lost elements make a limited contribution to landscape character, and/or change affects a very small geographical area, and/or the development introduces characteristics that are consistent with or enhance the landscape, and/or effects may be short term, temporary or reversible |

Assessment criteria used to assess landscape effects

5.3.10 Receptor sensitivity and magnitude of change arising from the Proposed Development are combined using a combination of professional judgement and experience. Refer to Table C.

Table C: Scale of Effects

| | | Sensitivity | | | | | |
|---|---|---|---|---|---|---|---|
| | | High | Medium-High | Medium | Medium-Low | Low | Negligible |
| Nature of Change | High | Very Major | Major | Major | Major-Moderate | Moderate | Negligible |
| | Medium-High | Major | Major | Major-Moderate | Moderate | Moderate | Negligible |
| | Medium | Major | Major-Moderate | Moderate | Minor-Moderate | Minor-Moderate | Negligible |
| | Medium-Low | Major-Moderate | Moderate | Minor-Moderate | Minor-Moderate | Minor | Negligible |
| | Low | Moderate | Moderate | Minor-Moderate | Minor | Minor | Negligible |
| | Negligible | Negligible | Negligible | Negligible | Negligible | Negligible | Negligible |

## 5.4 Method for Assessing Views

5.4.1 A preliminary ZTV has been used to inform the extent of the study area based on the theoretical visibility of the development. The ZTV illustrates the extent to which the proposed development site as a whole is potentially visible from the surrounding area. The ZTV was prepared using GIS software (QGIS) by carrying out an analysis of the visibility of the site from the surrounding area up to 5km using a digital terrain model from OS Landform DTM profile and OS Panorama DTM data and LiDAR data where coverage allows. Calculations are based on bare earth survey OS height data with a viewer height set at 1.7m. The digital terrain model and subsequent output are based on bare earth modelling and as such do not take into account any screening from land cover such as buildings, hedgerows and trees. ZTV mapping therefore represents a 'worst case' scenario assuming 100% visibility, where the actual extents of visibility are likely to be less extensive. The ZTV was used to determine where there may be potential views of the development which are then further verified with site visits. The ZTV is used to identify potential key views of the development which are then verified by field work to further identify visual receptors.

5.4.2 Viewpoints selected for inclusion in the assessment and for illustration of the visual effects fall broadly into three groups:

- Representative viewpoints, selected to represent the experience of different types of visual receptor, where larger numbers of viewpoints cannot all be included individually and where the notable effects are unlikely to differ – for example, certain points may be chosen to represent the views of particular public footpaths and bridleways
- Specific viewpoints, chosen because they are key and sometimes promote viewpoints within the landscape, including for example specific local visitor attractions, viewpoints in areas of particularly noteworthy visual and/or recreational amenity such as landscapes with statutory landscape designations, or viewpoints with particular cultural landscape associations
- Illustrative viewpoints, chosen specifically to demonstrate a particular effect or specific issues, which might, for example, be restricted visibility at certain locations

5.4.3 Visual effects are determined through a process of identifying which visual receptors are likely to experience notable visual effects. The process of identifying effects involves determining the sensitivity of each visual receptor and magnitude of change experienced at each which leads to a professional judgement of the visual effects.

Value attached to views

5.4.4 Visual sensitivity is partially determined by judgements made attributing value to views. Judgements take account of:

- Recognition of the value attached to particular views, for example in relation to heritage assets, or through planning designations
- Indicators of the value attached to views by visitors, for example through appearances in guidebooks or on tourist maps, provision of facilities for their enjoyment (such as parking places, sign boards and interpretive material) and reference to them in literature or art

5.4.5 The value of views is defined as follows:

- High; recognition of the view by its relation to a heritage asset or national planning designation (AONB, National Park, National Trail). Appearance in guide books, tourist maps or featured in well-known art works. Provision of facilities such as interpretation panels, parking places and signage. Views enjoyed at a local or national level.
- Medium; local planning designation (Country Park, Area of Great Landscape Value) or valued locally by village design statement or sensitivity assessment. May be some detractor elements, views enjoyed at a local level.
- Low; no specific value placed by designation or publication, may be a large proportion of detractor elements within the view, views enjoyed at a community or site level.

Susceptibility of visual receptors to change

5.4.6 Visual sensitivity is partly determined by the susceptibility to change of each visual receptor.

The susceptibility of different visual receptors to changes in views and visual amenity is mainly a function of:

- The occupation or activity of people experiencing the view at particular locations
- The extent to which their attention is focussed on the views and visual amenity they experience at particular locations

5.4.7 The susceptibility of visual receptors to change in views and visual amenity is defined broadly as follows:

- High: residents at home (generally rooms occupied during daylight hours), people engaged in outdoor recreation (PRoWs or where attention is focussed on the landscape or particular views), visitors to heritage assets or other attractions where the surroundings are important to the experience, communities where views contribute to the landscape setting enjoyed by residents in the area
- Medium: travellers on roads (except main roads and motorways), trains or other transport modes such as cyclists.
- Low: people travelling on main roads and motorways, people engaged in outdoor sport or recreation which does not involve or depend upon appreciation of views, people at their place of work whose attention may be focused on their work or activity.

5.4.8 Combining judgements regarding the susceptibility of change with the value attached to views leads to a professional judgement of sensitivity of each visual receptor. Refer to Table D.

| Table D: Definition of Visual Sensitivity | |
|---|---|
| Sensitivity rating: | Definition: |
| High | Receptor may have high susceptibility to changes in view/visual amenity, views experienced may be of a high value designated landscape or at a defined publicised viewing point/attraction, receptors may include residents at home (from rooms generally occupied in daylight hours), users of national or long distance trails or visitors to listed parks/gardens. |
| Medium-High | Receptor may have medium or high susceptibility to changes in view, views experienced may be of a high or medium value designated landscape, receptors may include travellers on scenic road routes, |

| | |
|---|---|
| | residents at home (from rooms not facing the development or generally not occupied in daylight hours), users of public rights of way. |
| Medium | Receptors may have medium susceptibility to changes in view/visual amenity, views experienced may be within medium value locally designated landscape, receptors may include travellers on roads, pedestrians or cyclists. |
| Medium-Low | Receptors may have with low or medium susceptibility to changes in view/visual amenity, views experienced may be of a medium or low value locally designated landscape where there maybe be some detractors, receptors may include commuters on busy roads such as motorways or urban roads, users may be involved in passive outdoor sport such as golf. |
| Low | Receptors may have low susceptibility to change in views/visual amenity, views experienced are likely to be of low value undesignated landscape with several detractors, receptors may include people at work, people engaged in outdoor sport or recreation which does not depend on landscape as a setting. |
| Negligible | Receptors may have low or negligible susceptibility to change in views/visual amenity, views experienced are likely to be of low value undesignated landscape dominated by detractors where there are low numbers of receptors engaged in indoor active work. |

Visual Receptor – Overall Magnitude of Effect

5.4.9 The magnitude of the effect is determined by combining the professional judgements about the size or scale of the visual effect, the geographical extent over the area which the effect occurs, its reversibility and its duration. Refer to Table E.

| Table E: Definition of Visual Magnitude of Change | |
|---|---|
| Magnitude of Change: | Definition: |
| High | Total loss or very major alteration of key views, and/or site may form a very large proportion of the view, and/or all of the site may be visible, and/or views of the site may be experienced over a long distance by high numbers of receptors, and/or views may be permanent and irreversible. |
| Medium-High | Major alteration of key views, and/or site may form a medium to large proportion of the view, and/or most of the site may be visible, and/or views of the site may be experienced over a moderate to long distance by moderate to high numbers of receptors, and/or views may be permanent and irreversible. |
| Medium | Moderate alteration of key views, and/or site may form moderate proportion of the view, and/or around half of the site may be visible, |

| | |
|---|---|
| | and/or views of the site may be experienced over a moderate distance by moderate numbers of receptors, and/or views may be permanent and irreversible. |
| Medium-Low | Moderate to minor alteration of key views, and/or site may form moderate to minor proportion of the view, and/or partial views of the site, and/or views of the site may be experienced over a moderate to short distance by moderate to low numbers of receptors, and/or views may be permanent and irreversible. |
| Low | Minor alteration of key views, and/or site may form small proportion of the view, and/or partial or obscured views of the site, and/or views of the site may be experienced over a short/local distance by low numbers of receptors, and/or views may be permanent and irreversible. |
| Negligible | Limited alteration of key views, and/or site may form very small proportion of the view, and/or limited views of the site, and/or views of the site may be experienced over a very short distance by a limited number of receptors, and/or views may be temporary, reversible, permanent or irreversible. |

Assessment criteria used to assess visual effects

5.4.10 Receptor sensitivity and magnitude of change arising from the proposed development are combined using a combination of professional judgement and experience. Refer to Table F.

Table F: Scale of Effects

| | | Sensitivity | | | | | |
|---|---|---|---|---|---|---|---|
| | | High | Medium-High | Medium | Medium-Low | Low | Negligible |
| Nature of Change | High | Very Major | Major | Major | Major-Moderate | Moderate | Negligible |
| | Medium-High | Major | Major | Major-Moderate | Moderate | Moderate | Negligible |
| | Medium | Major | Major-Moderate | Moderate | Minor-Moderate | Minor-Moderate | Negligible |
| | Medium-Low | Major-Moderate | Moderate | Minor-Moderate | Minor-Moderate | Minor | Negligible |
| | Low | Moderate | Moderate | Minor-Moderate | Minor | Minor | Negligible |
| | Negligible | Negligible | Negligible | Negligible | Negligible | Negligible | Negligible |

Assessment criteria used to assess scale of effects

5.4.11 Following identification of the sensitivity, extent and scale of the individual landscape and

visual effects, the overall effects are combined with each other. A judgement is then made by identifying the most notable effects, after mitigation, resulting in the likely impacts of the proposed development. The definitions of the final statement of scale of effects are shown in Table G.

| Table G: Definition of Scale of Effects | |
|---|---|
| Scale of impact: | Definition of predicted effects: |
| Major beneficial (positive) effect | The proposals would result in:<br>• The scheme causing a notable improvement to the existing view<br>• Successful mitigation providing notable improvements to landscape quality and character<br>• Fitting in very well with the scale, landform and pattern of the existing landscape |
| Moderate beneficial (positive) effect | The proposals would result in:<br>• The scheme causing a noticeable improvement to the existing view<br>• Successful mitigation providing noticeable improvements to landscape quality and character<br>• Fitting in well with the scale, landform and pattern of the existing landscape |
| Slight beneficial (positive) effect | The proposals would result in:<br>• The scheme causing perceptible improvement in the existing view<br>• Successful mitigation providing slight improvements to landscape quality and character<br>• Fitting in with the scale, landform and pattern of the existing landscape |
| Neutral | The proposals would result in:<br>• The scheme causing no discernible deterioration or improvement to the existing view<br>• Mitigation that neither deteriorates or improves landscape<br>• The scale, landform and pattern of the current landscape is broadly retained |
| Slight adverse (negative) effect | The proposals would result in:<br>• The scheme causing a slight perceptible deterioration to the existing view<br>• Almost wholly success in mitigating adverse effects<br>• Not quite fitting the landform and scale of the landscape |
| Moderate adverse (negative) effect | The proposals would result in:<br>• The scheme causing a noticeable deterioration to the existing view<br>• Only partial mitigation of adverse effects<br>• Variance to the existing landscape, out of scale or at odds with the local pattern and landform |

| | |
|---|---|
| Major adverse (negative) effect | The proposals would result in:<br>• The scheme being immediately apparent causing notable deterioration to the existing view<br>• No way of fully mitigating adverse effects<br>• Considerable variance to the existing landscape, degrading the integrity of its overall character |

# 5.5 GLOSSARY OF TERMS

| | |
|---|---|
| Characterisation | The process of identifying areas of similar landscape character, classifying and mapping them and describing their character. |
| Designated landscape | Areas of landscape identified as being of importance at international, national or local levels, either defined by statute or identified in development plans or other documents. |
| Elements | Individual parts which make up the landscape, such as, for example, trees, hedges and buildings. |
| Geographical Information System (GIS) | A system that captures, stores, analyses, manages and presents data linked to location. It links spatial information to a digital database. |
| Green Infrastructure (GI) | Network of green spaces and watercourses and water bodies that connect rural areas, villages, towns and cities. |
| Indirect effects | Effects that result indirectly from the proposed project as a consequence of the direct effects, often occurring away from the site, or as a result of a sequence of interrelationships or a complex pathway. They may be separated by distance or in time from the source of the effects. |
| Iterative design process | The process by which project design is amended and improved by successive stages of refinement which respond to growing understanding of environmental issues. |
| Key characteristics | Those combinations of elements which are particularly important to the current character of the landscape and help to give an area its particularly distinctive sense of place. |
| Land use | What land is used for, based on broad categories of functional land cover, such as urban and industrial use and the different types of agriculture and forestry. |
| Landform | An area, as perceived by people, the character of which is the result of the action and interaction of natural and /or human factors. |
| Landscape and Visual Impact Assessment (LVIA) | A tool used to identify and assess the likely significance or scale of the effects of change resulting from development both on the landscape as an environmental resource in its own right and on people's views and visual amenity. |
| Landscape Character | A distinct, recognisable and consistent pattern of elements in the landscape that makes one landscape different from another, rather than better or worse. |
| Landscape Character Areas (LCA's) | These are single unique areas which are the discrete geographical areas of a particular landscape type. |
| Landscape Character Assessment | The process of identifying and describing variation in the character of the landscape, and using this information to assist in managing change in the landscape. It seeks to identify and explain the unique combination of elements and features that |

| | |
|---|---|
| | make landscape distinctive. The process results in the production of a Landscape Characterisation Assessment. |
| Landscape Effects | Effects on the landscape as a resource in its own right. |
| Landscape quality (condition) | A measure of the physical state of the landscape. It may include the extent to which typical character is represented in individual areas, the intactness of the landscape and the condition of individual elements. |
| Landscape receptors | Defined aspects of the landscape resource that have the potential to be affected by a proposal. |
| Landscape value | The relative value that is attached to different landscape by society. A landscape may be valued by different stakeholders for a whole variety of reasons. |
| Magnitude (of effect) | A term that combines judgements about the size and scale of the effect, the extent of the area over which it occurs, whether it is reversible or irreversible and whether it is short or long term in duration. |
| Photomontage | A visualisation which superimposes an image of a proposed development upon a photograph or series of photographs. |
| Scoping | The process of identifying the issues to be addressed by an EIA. It is a method of ensuring that an EIA focuses on the important issues and avoids those that are considered to be less significant. |
| Sensitivity | A term applied to specific receptors, combining judgements of the susceptibility of the receptor to the specific type of change or development proposed and the value related to that receptor. |
| Significance | A measure of the importance or gravity of the environmental effect, defined by significance criteria specific to the environmental topic. Only applicable to Proposed Developments screened as requiring a full Environmental Impact Assessment. |
| Susceptibility (or vulnerability) | How susceptible or vulnerable the landscape receptor is to accommodate the proposed development without undue negative consequences for the maintenance of the baseline situation |
| Time depth | Historical layering – the idea of a landscape as a 'palimpsest, a much written –over manuscript. |
| Tranquillity | A state of calm and quietude associated with peace, considered to be an important asset of landscape. |
| Visual amenity | The overall pleasantness of the views people enjoy of their surroundings, which provides an attractive visual setting or backdrop for the enjoyment of activities of the people living, working, recreating, visiting or travelling through an area. |
| Visual effects | Effects on specific views and on the general visual amenity experienced by people. |
| Visual receptors | Individuals and/or defined groups of people who have the potential to be affected by a proposal. |
| Visualisation | A computer simulation, photomontage or other technique illustrating the predicted appearance of a development |

| | |
|---|---|
| Zone of Theoretical Visibility (ZTV) | A map, usually digitally produced, showing areas of land within which a development is theoretically visible. |

# 6 APPENDIX B - FIGURES


KEY

VP1 Viewpoint Location/Direction



N

SCALE: **NTS**

Project Name:
Caunton Lodge Farm

MHP Reference:
26049

| Revision: | Status: | Date: |
|---|---|---|
| | V1 | 01/04/2026 |

**Figure 1** Caunton Lodge Farm Viewpoint Photograph Locations
**26049** Caunton Lodge Farm

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KEY

Proposed solar arrays to 4m height

Base map reproduced from **OS Explorer 1:25000**

N

SCALE: **NTS**



Project Name:
Caunton Lodge Farm

MHP Reference:
26049

| Revision: | Status: | Date: |
|---|---|---|
| | V1 | 01/04/2026 |

**Figure 2** Caunton Lodge Farm Contextual Landscape Showing Proposed Solar Arrays
**26049** Caunton Lodge Farm

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**Figure 3 Window Plan Photograph 1a -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | N/A |

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**Figure 4 Window Plan Photograph 2b -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | N/A |

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**Figure 5 Viewpoint Photograph 1 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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Extent of Single Frame View

**Figure 6 Viewpoint Photograph 1 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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**Figure 7 Viewpoint Photograph 2 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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Extent of Single Frame View

**Figure 8 Viewpoint Photograph 2 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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**Figure 9 Viewpoint Photograph 3 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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Extent of Single Frame View

**Figure 10 Viewpoint Photograph 3 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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**Figure 11 Viewpoint Photograph 4 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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Extent of Single Frame View

**Figure 12 Viewpoint Photograph 4 -** Panoramic for Context
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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**Figure 13 Viewpoint Photograph 5 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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Extent of Single Frame View

**Figure 14 Viewpoint Photograph 5 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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**Figure 15 Viewpoint Photograph 6 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

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Extent of Single Frame View

**Figure 16 Viewpoint Photograph 6 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

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**Figure 17 Viewpoint Photograph 7 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

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Extent of Single Frame View

**Figure 18 Viewpoint Photograph 7 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

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**Figure 19 Viewpoint Photograph 8 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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Extent of Single Frame View

**Figure 20 Viewpoint Photograph 8 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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**Figure 21 Viewpoint Photograph 9 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking west |

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Extent of Single Frame View

**Figure 22 Viewpoint Photograph 9 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking west |

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**Figure 23 Viewpoint Photograph 10 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

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Extent of Single Frame View

**Figure 24 Viewpoint Photograph 10 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

LANDSCAPE ARCHITECTURE
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**Figure 25 Viewpoint Photograph 11 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

LANDSCAPE ARCHITECTURE
MASTERPLANNING
ARBORICULTURE
mhp

Extent of Single Frame View

**Figure 26 Viewpoint Photograph 11 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

LANDSCAPE ARCHITECTURE
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**Figure 27 Viewpoint Photograph 12 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

LANDSCAPE ARCHITECTURE
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mhp

Extent of Single Frame View

**Figure 28 Viewpoint Photograph 12 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

LANDSCAPE ARCHITECTURE
MASTERPLANNING
ARBORICULTURE
mhp

**Figure 29 Viewpoint Photograph 13 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

LANDSCAPE ARCHITECTURE
MASTERPLANNING
ARBORICULTURE
mhp

Extent of Single Frame View

**Figure 30 Viewpoint Photograph 13 -** Panoramic for Context

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | N/A |
| Image captured: | MAR 2026 | Direction of view: | Looking south west |

LANDSCAPE ARCHITECTURE
MASTERPLANNING
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**Figure 31 Window View Photograph 5 -** Panoramic View

**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

LANDSCAPE ARCHITECTURE
MASTERPLANNING
ARBORICULTURE
mhp

**Figure 32 Window View Photograph 6 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

LANDSCAPE ARCHITECTURE
MASTERPLANNING
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**Figure 33 Window View Photograph 12 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

LANDSCAPE ARCHITECTURE
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**Figure 34 Window View Photograph 13 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

LANDSCAPE ARCHITECTURE
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**Figure 35 Window View Photograph 14 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

LANDSCAPE ARCHITECTURE
MASTERPLANNING
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mhp

**Figure 36 Window View Photograph 15 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

LANDSCAPE ARCHITECTURE
MASTERPLANNING
ARBORICULTURE
mhp

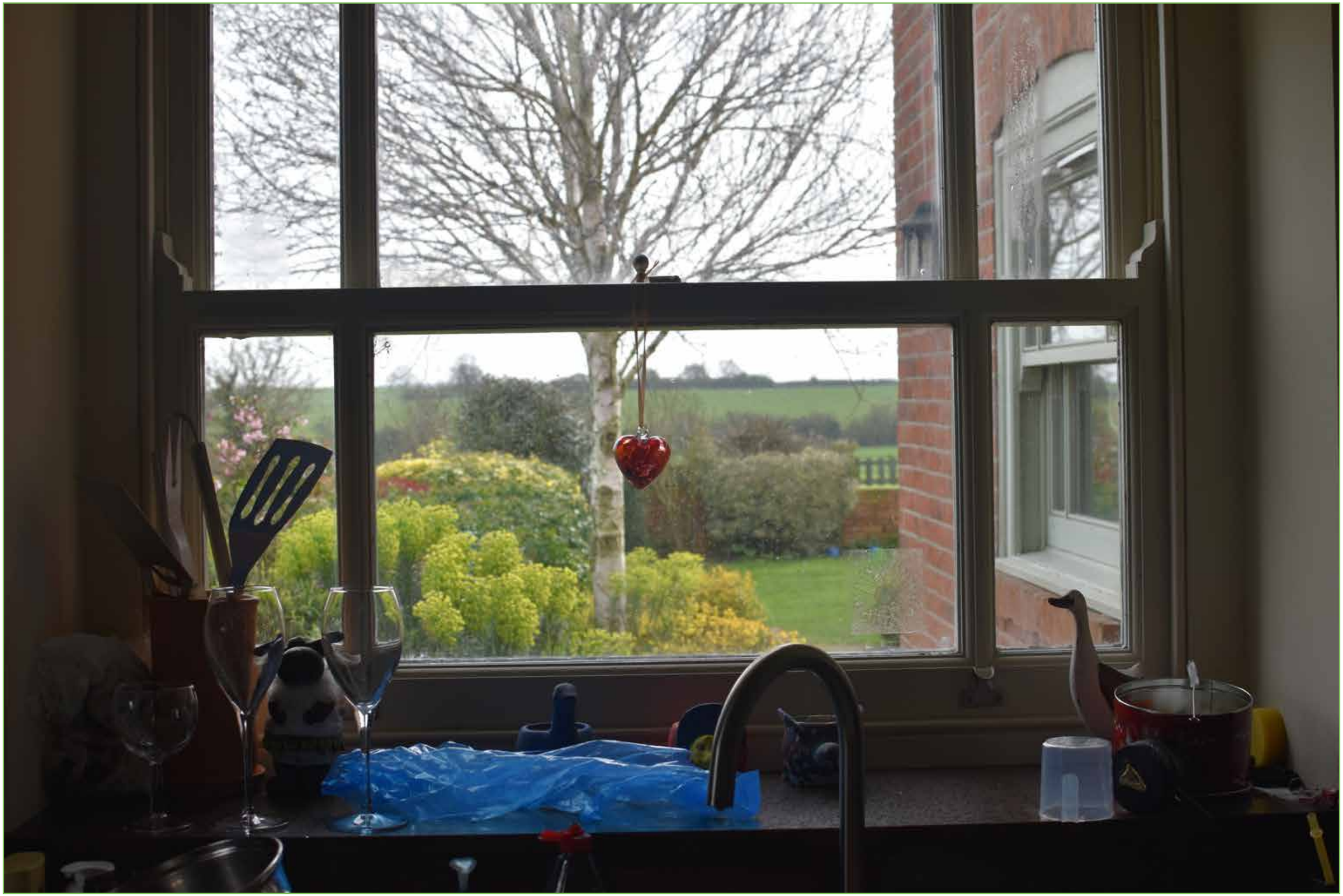

**Figure 37 Window View Photograph 16 -** Single Frame View
**26049** Caunton Lodge Farm

| | | | |
|---|---|---|---|
| Visualisation Type: | Type 1 | Camera Make/Model: | Nikon D3500 |
| Projection: | Planar | Camera Lens: | Nikon DXPrime 35mm |
| Enlargement factor: | 100% @A3 | HFoV: | 39.6° |
| Image captured: | MAR 2026 | Direction of view: | Looking south |

LANDSCAPE ARCHITECTURE
MASTERPLANNING
ARBORICULTURE
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**Deadline 5 – Interested Party's Response to the Applicant's Position Statement (Annex 2)**

**Mr Richard Gill, Mrs Lisa Gill and Drone Defence Services Ltd**

## 1. Preliminary

1.1 The Applicant did not provide a freestanding Position Statement in response to the Interested Party's Deadline 3 submissions. Instead, its response is set out within Annex 2: Drone Defence Position Statement submitted at Deadline 4 **[EN010162/APP/8.29]**.

1.2 The Interested Party notes that Annex 2 does not respond individually to each of the documents submitted at Deadline 3 (namely the Engineering Assessment, Legal Note, Further Written Submissions, Planning Evidence, and Heritage Report), but instead provides a consolidated narrative response. Where issues raised at Deadline 3 are not addressed in Annex 2, the Interested Party's position as previously set out is maintained in full.

1.3 Heritage matters raised by the Applicant are addressed in summary below and are supplemented by the detailed Heritage Note appended to this response at Annex A, which forms part of the Interested Party's Deadline 5 submission.

1.4 For the avoidance of doubt, any matter not expressly responded to below is not accepted, and the absence of comment on any assertion or inference contained in Annex 2 must not be taken as agreement, concession or acquiescence. The Interested Party expressly reserves its position on all such matters.

## 2. The Legal Rights Benefiting Caunton Lodge Farm

2.1 It is accepted by both parties that Caunton Lodge Farm (Lot 4) benefits from rights granted under the Transfer dated 30 September 1998 (as set out in the Interested Party's Response to the Examining Authority's Second Written Questions **[REP4-071]**), including rights to install and retain service installations and for the free passage of services across neighbouring land **[EN010162/APP/8.29, Annex 2, paras. 2.1.1–2.1.3]**.

2.2 The Interested Party notes the Applicant's acceptance that:

a. The Rights are not confined to a specific route or corridor;
b. They are not limited to residential use; and
c. They benefit the "owners and occupiers for the time being" of Lot 4.

2.3 The Applicant's subsequent analysis, however, proceeds on the basis of several assumptions and limitations which do not arise from the wording of the Rights themselves. In particular, the repeated characterisation of the Rights as being concerned principally with "domestic" or "mains" connections is not supported by the drafting of the 1998 Transfer.

2.4 In construing the scope of express easement rights, the courts have consistently confirmed that the starting point is the wording of the grant itself, read objectively and in context, rather than assumptions as to the grantor's presumed intentions or what might be sufficient for a typical or conventional form of use. Where rights are granted in general terms, they fall to be interpreted so as to allow them to be exercised in a practical and effective manner consistent with their express wording. Against that approach, the Applicant's attempt to read implied limitations into the Rights finds no support in the language of the 1998 Transfer.

2.5 The correct question is not whether the Rights would be sufficient for a hypothetical domestic connection, but whether they can be exercised in a practical and effective manner having regard to their full scope, including future service requirements, without being materially constrained by the proposed Development.

## 3. Alternative Routes and Alleged Mitigation of Interference

3.1 The Applicant places reliance on the existence of alternative routes within the wider area burdened by the Rights **[EN010162/APP/8.29, Annex 2, paras. 2.1.17–2.1.23]**. The Interested Party does not dispute that the Rights extend across a wider area.

3.2 However, the mere existence of theoretical alternatives does not demonstrate that the Rights would remain practically exercisable. No technical, engineering or safety led assessment is provided to establish that the proposed alternatives would:

a. Be equivalent in functional terms;
b. Be capable of accommodating the required infrastructure; or

c. Avoid materially greater complexity, risk or operational constraint.

3.3 The Applicant's approach conflates the existence of Rights over a wide area with the practical usability of those Rights in circumstances where the proposed Development introduces physical infrastructure, spatial constraints, and restrictions on access and maintenance.

3.4 As set out in the Interested Party's Engineering Assessment submitted at Deadline 3, the Interested Party's concern is not hypothetical. It is that the Development, as proposed, would impose constraints which materially diminish the practical value of the Rights in this specific location.

## 4. Distinction Between Rights and Drone Defence Activities

4.1 The Applicant repeatedly seeks to link the scope of the Rights to the specific activities of Drone Defence Services Ltd ("DDS"), including assertions that the Interested Party's case depends upon DDS's operational requirements **[EN010162/APP/8.29, Annex 2, paras. 2.1.9–2.1.11]**.

4.2 That is not correct. The Interested Party's position is that:

a. The Rights are freestanding legal interests benefiting Caunton Lodge Farm; and

b. The question for the Examination is whether interference with those Rights is necessary and proportionate.

4.3 The operational activities of DDS necessarily derive benefit from the continued availability and exercisability of the Rights. However, the Interested Party's objection is not predicated on any particular assumed future exercise of those Rights, but on the fact that the Development, as proposed, would materially constrain or render nugatory rights which presently exist, benefit the land, and form part of the lawful baseline against which interference must be justified.

4.4 The operational impacts on DDS arise separately, from the physical and functional changes introduced by the Development itself. They are not merely contingent upon the exercise of the Rights, and the Applicant's attempt to collapse these two issues obscures the proper analysis.

## 5. Planning Status and Allegations of Unlawfulness

5.1 The Applicant's suggestion that DDS's activities or associated infrastructure may be unlawful in planning terms **[EN010162/APP/8.29, Annex 2, Section 3]** is a serious assertion. No enforcement notice, planning contravention notice, or other formal determination by the local planning authority is identified in support of the Applicant's assertion and the Interested Party is not aware of any enforcement action having been taken.

5.2 In circumstances where the Applicant advances an allegation of unlawfulness without evidential foundation, the Interested Party does not accept that the burden lies upon it to disprove that allegation within the Examination.

5.3 Notwithstanding the above, the relevant issue for the Examination is the effect of the proposed Development on the use of the land as it exists in fact, not the Applicant's characterisation of planning status. DDS's operations are established, ongoing, and evidenced. The impacts identified arise from the Development's physical form and operational consequences.

5.4 The Interested Party therefore reserves its position on planning matters, including any future engagement with the local planning authority, and does not accept that unsubstantiated assertions of unlawfulness reduce the weight to be given to the identified impacts.

## 6. Compulsory Acquisition and Necessity

6.1 In relation to Plots 15/16, 15/17 and 16/1, the Applicant has not addressed the core question posed by the Examining Authority namely why it is necessary to interfere with existing rights in their current form, rather than accommodating them through proportionate design modification.

6.2 Reliance on high level site selection criteria, optimisation narratives and option agreements does not constitute a site specific assessment of necessity. No quantified or comparative analysis is provided to demonstrate that:

a. Alternative layouts could not be pursued; or

b. Any reduction or redistribution of panels would have more than a marginal effect on generation capacity.

6.3 The Applicant relies on flexibility in panel selection, overplanting and scheme wide optimisation, yet treats the configuration of these specific plots as immutable. At the same time, it asserts that the Interested Party's infrastructure can be constrained within narrow corridors and alternative routes. These positions are inconsistent.

6.4 For the sake of clarity, the Interested Party does not merely object the inclusion of the plots within the Order Limits but rather the objection is focused to:

a. The siting of solar infrastructure;
b. The proposed permissive route; and
c. The interference with existing Rights.

6.5 In these circumstances, the Applicant has not demonstrated that interference with rights is necessary for the purposes of section 122 of the Planning Act 2008, and the Interested Party reserves its position on that issue.

## 7. Engineering and Service Corridor

7.1 The Applicant does not substantively engage with the Engineering Assessment submitted at Deadline 3 **[REP3-111]**. Assertions regarding minimum widths and alternative routes do not address the distinction between:

a. Minimum construction clearances in isolation; and
b. The requirements of a continuous, operationally viable corridor capable of installation, maintenance and long-term use.

7.2 No alternative engineering assessment is provided, and no explanation is offered for the discrepancy between the buffer distances and safeguards applied to the Applicant's own infrastructure and the significantly more constrained approach proposed for the Interested Party's services.

7.3 For the avoidance of doubt, the Interested Party does not accept that the indicative corridor plan referred to by the Applicant represents a technically adequate or legally equivalent solution, nor that it preserves the practical exercisability of the Rights. Engagement in discussions regarding possible routing options has been undertaken

without prejudice and does not constitute agreement that such arrangements would be sufficient, acceptable, or compatible with the Rights as granted. The Interested Party expressly reserves its position in this regard.

## 8. Drone Operations and Operational Environment

8.1 The Applicant's response to the impacts on drone operations relies on generalised aviation assumptions, speculative mitigation, and assertions regarding future qualifications and reconfiguration **[EN010162/APP/8.29, Annex 2, Section 8]**.

8.2 This does not engage with the detailed evidence provided by the Interested Party regarding:

a. Ground risk and contingency volumes;
b. Electromagnetic and radar interference;
c. Loss of repeatable environmental baselines; and
d. The interaction between fixed infrastructure, public access and system validation.

8.3 Suggestions that activities could be relocated, systems made mobile, or operations undertaken elsewhere do not address the site specific nature of the testing environment at Caunton Lodge Farm, as set out in DDS' response to ExA's questions **[REP4-071]**.

8.4 The Interested Party does not accept that these matters are resolved by general regulatory statements and expressly reserves its position.

## 9. Design, Landscape, Heritage and Permissive Route

9.1 The Interested Party maintains its position that:

a. Avoidance through localised design change has not been properly explored;
b. The proposed permissive route is not necessary to deliver the Development; and
c. Its inclusion represents a discretionary design choice with disproportionate impact.

9.2 The Applicant's response does not provide a site specific assessment demonstrating that layout refinement would not reduce the identified effects.

9.3 In relation to heritage, while the Applicant now accepts that Caunton Lodge Farm is a non-designated heritage asset, this acknowledgment arose late in the Examination. No updated heritage assessment has been produced, and the Applicant's critique does not displace the conclusions of the Hutton + Rostron Heritage Report (as set out in the Interested Party's written submissions a Deadline 3 **[REP3-111]**.

9.4 Further details on the heritage baseline, the contribution of setting to significance, and the adequacy of the Applicant's assessment is provided in the Heritage Note appended at Annex A, which should be read alongside this response.

## 10. Conclusion and Reservation of Position

10.1 The Interested Party maintains its objections and concerns as previously set out. Where Annex 2 does not engage substantively with those matters, the Interested Party's earlier submissions stand.

10.2 This response, together with its appended annexes, including the Heritage Note at Annex A, is submitted without prejudice to the Interested Party's earlier submissions and with full reservation of position. The Interested Party expressly reserves the right to:

a. Respond further to matters arising;
b. Challenge assertions not supported by evidence; and
c. Make additional representations as the Examination proceeds.

10.3 Nothing in this response, nor any absence of comment on a particular assertion, should be taken as acceptance of the Applicant's position.

15 APRIL 2026

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London
N3 1HF
Ref: DD:430129

**ANNEX A**

**Heritage Note – Response to NSDC and Applicant Deadline 3 Position**

1. This note is provided in response to comments made by Newark & Sherwood District Council (NSDC) in relation to the preliminary heritage assessment of Caunton Lodge Farm, and to address points raised by the Applicant in its Position Statement to Deadline 3 Submissions insofar as they relate to heritage matters.

2. NSDC have confirmed that the property constitutes a Non-Designated Heritage Asset and broadly agree with the description of its heritage interest and significance, noting both its historic and architectural value. However, they disagree with the conclusion that the proposed development would result in substantial harm to the setting of the asset, instead characterising the impact as negligible or marginal. The purpose of this note is to challenge this position and address the process in which their opinion was founded.

3. There is now no substantive disagreement between the parties regarding the status of Caunton Lodge Farm as a Non-Designated Heritage Asset. However, that position has only been reached during the course of the Examination. At the time the Environmental Statement (Chapter 11: Cultural Heritage and Archaeology) was prepared, the Applicant did not identify Caunton Lodge Farm as a heritage asset requiring assessment, and no assessment of its setting was undertaken within the ES. It is only following submissions by the Objectors and subsequent consideration by NSDC that the asset has been recognised and its setting accepted as a matter requiring assessment. This is a material point, as it indicates that the original heritage baseline was incomplete and that the scheme was brought forward without a full understanding of the heritage sensitivity of the site. The Applicant's own Design Approach Document confirms that the scheme layout evolved iteratively in response to identified constraints; however, that evolution did not take account of the heritage sensitivity of Caunton Lodge Farm at the time key design decisions were made. As a consequence, the design evolution of the scheme has not been informed by a consistent or complete understanding of heritage constraints across the site.

4. The asset derives its significance from a combination of its historic origins as an agricultural dwelling, with fabric dating to the late eighteenth century, and its architectural form reflecting vernacular agricultural development. Critically, however, its significance is also derived from its isolated rural setting, which makes a material and intrinsic contribution to its heritage interest. This is

consistent with national policy. Paragraph 5.9.3 of NPS EN-1 states that the setting of a heritage asset is the surroundings in which an asset is experienced and that this can contribute to its significance. While NSDC observe that subsequent alterations and modern interventions have reduced the intactness of the built form, this does not materially diminish the importance of the asset's setting. The significance of Caunton Lodge Farm is therefore not confined to the physical structure itself but extends to the way in which it is experienced within its surrounding agricultural landscape.

5. In this context, both NSDC's and the Applicant's position appear to place emphasis on the absence of direct physical impact within the curtilage of the property. This represents an unduly narrow interpretation of setting. EN-1 makes clear that setting is not limited to curtilage and may include the wider landscape context, including views to and from the asset. The agricultural land to the south of Caunton Lodge Farm forms a principal component of that setting, providing open and uninterrupted views, reinforcing the sense of isolation and rural character, and establishing a direct visual and spatial relationship between the dwelling and the surrounding countryside. The proposed development is located within this wider setting and therefore has the potential to affect the asset's significance, even in the absence of physical change within the curtilage itself.

6. The Applicant's Deadline 3 Position Statement includes criticism of the Hutton + Rostron assessment. Those comments do not introduce any new heritage evidence, nor do they present an alternative heritage assessment undertaken in accordance with recognised methodology. The critique instead reflects a difference in professional judgement as to the contribution made by the setting and the magnitude of change arising from the proposed development. In the absence of updated baseline evidence, site-based reassessment, or a formally presented alternative heritage analysis, there is no evidential basis upon which to displace the current conclusions.

7. The assessment of impact must be grounded in a correct understanding of baseline conditions, as required by EN-1 paragraphs 4.1.5 to 4.1.7, which require decision-making to take account of the nature, scale and significance of likely impacts. The baseline for Caunton Lodge Farm is characterised by open agricultural land to the south of the property, the absence of substantial boundary enclosure, and long-range, uninterrupted views which form an integral part of the experience of the asset. These characteristics are not incidental but are central to the contribution made by the setting to the asset's significance. Any assessment which assumes a materially different baseline, whether through the introduction

of enclosure or an overstatement of existing screening, would necessarily understate the magnitude of change and the resulting effect on significance.

8. It is acknowledged that the scheme has evolved since the preparation of the original assessment, including the introduction of a set-back of approximately 100 metres between the southern boundary of the property and the nearest extent of solar panels. This represents a degree of design modification and is noted. However, this change does not materially alter the baseline conditions of the asset's setting nor the nature of the effect arising from the development. The defining characteristic of the setting remains the open agricultural land to the south and the long-range, uninterrupted views across that landscape. The proposed development continues to occupy that principal setting and remains within the primary field of view from the dwelling.

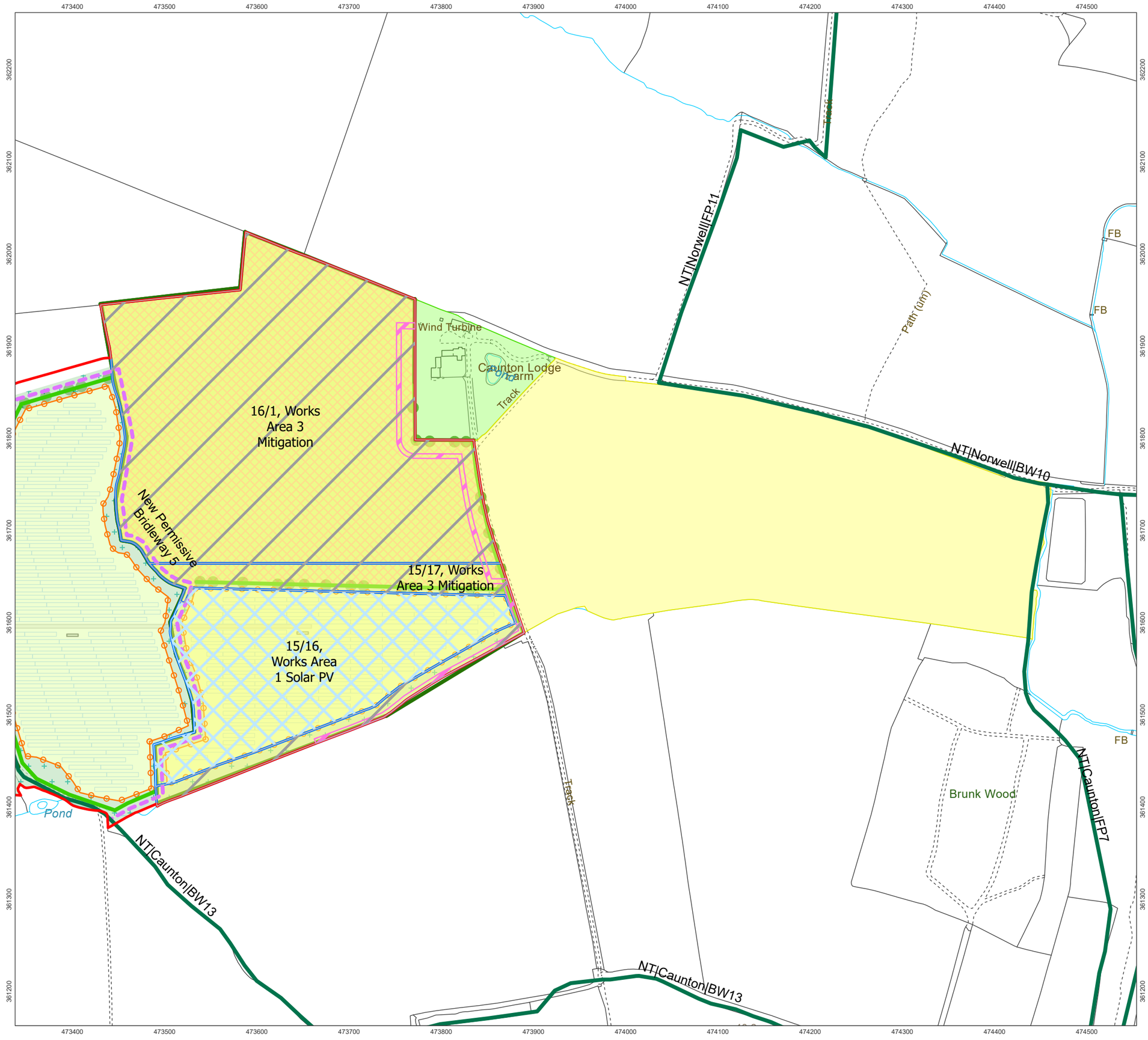
9. The Environmental Statement identifies known archaeological assets within the scheme, including Asset L9934, located within Solar Block W18.3 (Plot 15/16). The scheme proposes to retain development in this location, with mitigation through investigation and recording, as set out in the Archaeological Mitigation Strategy, rather than avoidance. This same area forms part of the principal setting of Caunton Lodge Farm, such that the proposed layout results in both direct impact on a recorded archaeological asset and harm to the setting of a recognised heritage asset within the same spatial context. By contrast, the scheme design, as described in the Environmental Statement and reflected in the Design Approach Document, has resulted in the removal or reduction of development in other areas in response to geophysical survey anomalies identifying only potential archaeological remains, prior to intrusive investigation to confirm their presence or significance. The Archaeological Mitigation Strategy itself adopts a mitigation-led approach, assuming development proceeds and addressing how archaeological remains are to be managed, rather than establishing a basis for avoidance of potential remains.

10. While national policy allows for both avoidance and mitigation depending on the circumstances, NPS EN-1 is clear that the mitigation hierarchy requires that adverse impacts be avoided through good design where reasonably possible, before reliance is placed on mitigation. The Applicant's own design evolution demonstrates that avoidance has been treated as a viable and appropriate response to potential heritage constraints elsewhere within the scheme. In this case, however, development is retained within W18.3 notwithstanding the presence of a recorded archaeological asset and the acknowledged sensitivity of the setting of Caunton Lodge Farm. This indicates that avoidance has not been applied even where multiple known heritage sensitivities coincide, and that the mitigation hierarchy has not been applied in a consistent or sequential manner.

11. The development introduces a large-scale solar installation together with associated infrastructure and planting on land which currently forms part of the asset's agricultural setting. EN-3 recognises that the deployment of large arrays of solar panels has the potential to result in substantial harm to the significance of heritage assets where their setting is affected. The effect in this case is not a minor or incremental change but a fundamental transformation of the character of the setting, replacing an agricultural context with a form of development that is industrial in nature and visually prominent. The magnitude of change arising from this intervention is therefore high.

12. Where the setting makes a material contribution to the significance of the asset, and where that setting is subject to a high magnitude of change, it follows that the resulting impact cannot reasonably be described as negligible. The proposed development would alter the way in which the asset is experienced, erode the qualities of isolation and rural character which underpin its significance, and diminish the contribution made by the surrounding landscape. In those circumstances, the level of harm must be regarded as significant. This accords with the requirement in national policy that decision-makers apply a balanced judgement having regard to both the scale of harm and the significance of the asset.

13. In conclusion, there is agreement that Caunton Lodge Farm is a Non-Designated Heritage Asset whose significance is materially derived from its rural setting. The Environmental Statement, the Design Approach Document and the Archaeological Mitigation Strategy collectively demonstrate that the scheme has been capable of avoiding potential heritage constraints elsewhere, yet retains development in a location where both known archaeological assets and the setting of a recognised heritage asset are affected. This indicates that heritage considerations have not been applied in a consistent or proportionate manner across the development, nor in accordance with the sequential application of the mitigation hierarchy. The Applicant's Deadline 3 comments do not introduce new evidence nor demonstrate any methodological error. Accordingly, the conclusion remains that the proposed development would give rise to a high level of harm to the significance of Caunton Lodge Farm through its effect on its setting.




Carter Jonas

Solar & Biodiversity Park

- Order Limits
- DCO Plots
- NT329682
- NT332979
- Public Rights of Way
- Permissive Bridleway
- Indicative recommended services corridor
- Services not generally permitted
- Services generally permitted
- Proposed Singular Trees
- Fence
- Internal Stone Roads
- Solar PV Modules
- Inverters
- Proposed Hedge
- Existing Hedgerow
- Arable
- Diverse Grassland
- Solar PV Grassland

1:4,000 Scale @ A3

0 0.05 0.1 0.2 km

Ref: J0080206-26-03 | Date: 30/01/2026

**Appendix [X]**
**Response to Drone Defence Services Limited and Richard Gill**

**GREAT NORTH ROAD SOLAR AND BIODIVERSITY PARK**
**This plan is being used in the Applicant's Response to ExA's First Written Questions**

M:\Land Assembly Services\04 Live Projects\J0080206 - Elements Green - Great North Road\03 Technical\Plans\Adhoc\Drone Defence Richard Gill\Drone Defence Richard Gill\Drone Defence Richard Gill v2.aprx\GNR A3 Template