



The countryside charity
Hertfordshire

31a Church Street
Welwyn
HERTS AL6 9LW
www.cpreherts.org.uk
office@cpreherts.org.uk
01438 717587

Standing up for Hertfordshire's countryside

Max Sanders
Planning and Building Control
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Hertfordshire
WD6 1WA

Our Ref:

Your Ref:

4th September 2020 (by email)

Dear Mr. Sanders,

Application No. 20/1183/EI1
Request for a screening opinion (Environmental Impact Assessment) for a proposed solar farm and battery storage facility.
On Land North Of Butterfly Lane, Land Surrounding Hilfield Farm
And Land East Of Hilfield Lane, Aldenham, Hertfordshire

CPRE Hertfordshire wish to comment on aspects of this application.

It is the applicant's view that the proposed development is unlikely to have significant environmental impacts, is not EIA Development and does not require an Environmental Statement to be submitted with the future planning application.

Our interest in respect of the Environmental Impact Assessment is on the likely impact on the Green Belt, existing land use, landscape character, local heritage and amenity.

In terms of the Green Belt, the substation and switchgear compound and the security fencing around the array sites will impact on the openness of the Green Belt and we would expect to see details of mitigation measures to offset the harm caused.

National Planning Practice Guidance (Paragraph 013 (Reference ID: 5-013-20150327) requires the applicant to demonstrate:

1. Where a proposal involves greenfield land, whether (i) the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land; and (ii) the proposal allows for continued agricultural use where applicable and/or encourages biodiversity improvements around arrays.

Regarding (i), while the applicant mentions in the Screening Report that other sites have been investigated and dismissed, there is no evidence presented to support this.

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CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Richard Bullen

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On land quality there is clear demonstration that the site is Subclass 3b agricultural land and hence not best and most versatile land. As such it is suitable for development of this nature. On (ii) there is no demonstration that the proposal allows for continued agricultural use and the Screening Report specifically states that it will 'rest'.

2. The proposal's visual impact, the effect on landscape of glint and glare and on neighbouring uses and aircraft safety.

The solar arrays which will form the bulk of the application are extensive, covering 20 arable and grassland pasture fields, totalling an area of approximately 123 hectares. The 'western' parcel rises 20 metres and the 'eastern' parcel rises 10 metres, increasing the prominence of the arrays in the landscape. They will inevitably have a disruptive visual impact on the immediate and surrounding landscape.

There are six ponds on the site and Hilfield Brook runs through it. There needs to be assessment and demonstration of how the proposal will affect the ecology of those water environments.

The parcels are criss-crossed by no less than 14 Public Rights of Way: (Bushey 36, 38, 46 and 53; Aldenham 14, 17, 30, 31, 32, 40, 42, 43, 44 and 78.) All of these PRoW will be impacted by the proposal with the views from them radically changed along most of their lengths. It is stated that "*no PRoW will be stopped up or diverted (temporarily or permanently) and they will remain open to public access throughout the construction, operational and decommissioning phases*" and that "*buffers [will be created] around PRoW through the Site to maintain their recreational amenity*". This fails to recognise that a substantial part of the amenity enjoyed by these PRoW is the views across open landscape. Nor is there any mention of the extent or nature of the 'buffers'. It would not be acceptable if the PRoW are reduced to narrow alleyways between either fencing or hedging.

The PRoW and the large number of buildings to the south of the arrays will be impacted by the effects of glint. In relation to these the Glint Assessment merely says that "*Any predicted impacts towards ground-based infrastructure can likely be solved with relatively simple mitigation strategies.*" 'Likely' solutions are unsatisfactory. Either these impacts can be mitigated or they can't and an indication of suitable mitigation measures is required.

3. Great care should be taken to ensure heritage assets are conserved in a manner appropriate to their significance, including the impact of proposals on views important to their setting. As the significance of a heritage asset derives not only from its physical presence, but also from its setting, careful consideration should be given to the impact of large scale solar farms on such assets. Depending on their scale, design and prominence, a

large scale solar farm within the setting of a heritage asset may cause substantial harm to the significance of the asset.

Within the boundaries of the two solar array parcels there are 5 heritage assets which are included in the Hertfordshire Historic Environment Record. Immediately adjacent to the parcels are 1 Grade II* listed building, 9 Grade II listed buildings and 1 scheduled monument. 2 of the Grade II listed buildings (Hilfield Farm and Slades Farm) will be enclosed by the proposal. All of these heritage assets will be significantly affected.

The Preliminary Heritage Assessment say merely that *“It may be possible to design the development to avoid impacts resulting from changes in the setting of heritage assets in the surrounding area – e.g. by excluding areas from development. Alternatively, vegetation may be planted or enhanced to screen the development from key views and either remove or reduce the impacts.”* Again, as with the Glint Assessment, ‘may be possible’ is not satisfactory. There needs to be a statement on how those heritage assets and their settings can be protected.

In our view the information provided does not meet the points included in National Planning Practice Guidance, and is insufficient to address the requirements of the National Planning Policy Framework in terms of the protection of landscape and heritage assets.

Unlike the applicant, we do consider that an Environmental Statement requires to be submitted with the future planning application.

Yours sincerely,

David Irving