



Priory Farm Solar Array

Proposed Development of a Photovoltaic Solar Array on Land at Priory Farm to the East of Great Wymondley, North Hertfordshire

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Proof of Evidence

Landscape and Visual Matters

On Behalf of the Applicant



AGR 4 Solar Limited

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1.0 INTRODUCTION AND SCOPE OF EVIDENCE

1.1 Qualifications and Relevant Experience

- 1.1.1 I am Jon Mason, a Technical Director of Axis, a multi-disciplinary planning, environmental and landscape consultancy.
- 1.1.2 I am a Chartered Member of the Landscape Institute and hold a BSC honours degree in Landscape Design and Plant Science from the University of Sheffield as well as a Diploma in Landscape Architecture also from the University of Sheffield. I lead a team of experienced landscape architects acting on a wide range of primarily infrastructure projects throughout the UK.
- 1.1.3 I have been employed by AXIS since 2001 and have over thirty years of professional experience since graduating in 1989. I have extensive experience of assessment of major infrastructure projects across the UK.
- 1.1.4 A senior Axis colleague within my team produced the Landscape and Visual Impact Assessment (LVIA) which accompanied the original planning application (ref 21/03380/FP) in December 2021. I have subsequently become involved following the decision by the Secretary of State to call-in the planning application for determination.
- 1.1.5 I am familiar with the Site and the immediate surrounding area having made a site visit on Tuesday 18th July 2023.
- 1.1.6 The evidence which I have prepared and provide for this call-in inquiry in this proof of evidence is true and I confirm that the opinions expressed are my true and professional opinions. My professional fees in respect of this project do not depend upon the outcome of this inquiry.

1.2 Scope of Evidence

- 1.2.1 This Proof of Evidence (PoE) has been prepared to consider landscape and visual matters relevant to the call-in Inquiry for the proposed solar farm development (the 'proposed development') on land at Priory Farm to the east of Great Wymondley, North Hertfordshire (the 'application site').



1.2.2 In calling-in the application for determination, the Secretary of State set out the matters which he particularly wishes to be informed about for the purposes of his consideration of the application, as follows:

“a) The extent to which the proposed development is consistent with Government policies for protecting Green Belt land as set out in the FPPF (Chapter 13); and

b) The extent to which the proposed development is consistent with Government policies for meeting the challenge of climate change, flooding and coastal change as set out in the FPPF (Chapter 14); and

c) The extent to which the proposed development is consistent with Government policies for conserving and enhancing the natural environment as set out in the FPPF (Chapter 15); and

d) The extent to which the proposed development is consistent with the development plan for the area; and

e) Any other matters the Inspector considers relevant.”

1.3 Proof of Evidence Structure

1.3.1 My evidence is divided into a number of sections which cover the following:

- i) Section 2 – The Site and its Landscape Context;
- ii) Section 3 – The Design of the Proposed Development;
- iii) Section 4 – The LVIA prepared for the Application;
- iv) Section 5 – Green Belt;
- v) Section 6 – Matters raised in the NHDC Statement of Case;
- vi) Section 7 – Matters raised by third parties;
- vii) Section 8 – Compliance with Policy; and
- viii) Section 9 – Conclusions.

1.3.2 A summary of this evidence is provided in a separate volume (APP/JM/1).



2.0 THE SITE AND ITS LANDSCAPE CONTEXT

2.1 Introduction

2.1.1 A detailed description of the Site and its surroundings is provided in Section 2.1 of the Planning, Design and Access Statement submitted with the Planning Application (CD2). Further description including details of relevant published landscape character assessments and designations is provided in the LVIA (CD4) submitted with the Planning Application. I do not repeat the full details here, but the following is a brief overview of the key considerations.

2.2 The Site

2.2.1 The Site comprises two separate areas of land. The principal part of the Site covers the solar development and grid connection to Wymondley Substation. A smaller secondary site allows for 'off-site' planting. The Site boundary is shown on CD14 and covers a total area of circa 88ha. This reduces to 84.7ha when excluding the grid connection and off-site planting.

2.2.2 The Site comprises fields currently in arable use to the north and south of Graveley Lane, to the west of the A1(M) and to the east of Great Wymondley. The Site includes the grid connection which follows Graveley Lane, Priory Lane, Stevenage Road, Blakemore End Road, and Sperberry Hill (road) to reach Wymondley Substation. The location of the 'off-site' planting is within fields to the south of Graveley Lane, and north of Priory Farm.

2.2.3 For the purposes of this proof, subsequent references to the 'Site' relate to the fields north and south of Graveley Lane, and do not include the linear corridor of land required for the grid connection. The proposed grid connection comprises buried cabling between the Site and Wymondley Substation that would be positioned entirely within the highway boundary. The grid connection works would likely bring a level of temporary disruption at a local level, but as the cabling is all below ground this would not result in any adverse landscape and visual effects that warrant assessment and reporting. Once the proposed development is operational the grid connection would not result in any landscape and visual effects.

2.2.4 The part of the Site to the north of Graveley Lane comprises two large field units and part of a third, all currently in arable use. The boundary between the central and



eastern fields is an intact hedgerow, and the boundary between the central and western fields is a fragmented hedgerow such that the internal field division is open at the northern end. The three fields are enclosed intermittently by hedgerows, trees and woodland blocks, with more open boundaries along parts of Graveley Lane to the south and the Hertfordshire Way to the east.

- 2.2.5 The part of the Site to the south of Graveley Lane comprises two large field units both in arable use and divided by a gappy hedgerow. The two fields are bounded by predominantly intact hedgerows to the south and west, with intermittent hedgerow and trees to the east and north alongside the A1(M) and Graveley Lane respectively. The boundaries to the A1(M) and Graveley Lane are intermittently open with only a fenceline separating them from the Site.
- 2.2.6 The Site slopes down from the A1(M) at its eastern boundary towards Great Wymondley to the west. The most elevated part of the Site is therefore adjacent to the A1(M) which is approximately at grade with the eastern Site boundary. Graveley Lane passes between the north and south of the Site in cutting beneath the A1(M).
- 2.2.7 Access and egress to the Site would be via Graveley Lane, utilising existing field access points into the Site which will require upgrades.

2.3 The Landscape Context

- 2.3.1 The landscape context for the Site is heavily influenced by the urban areas of Stevenage, Hitchin and Letchworth, and the associated road and rail infrastructure that connect them which includes the A1(M) on a north-south axis east of the Site, and the A602 and the East Coast Main Line to the south-west of the Site.
- 2.3.2 More locally to the Site the village of Great Wymondley lies approximately 160m to the west; Little Wymondley is 500m to the south-west separated from the Site by the East Coast Main Line; Graveley is 120m to the east but separated from the Site by the A1(M).
- 2.3.3 Medium- to large-scale arable fields generally with mature and often tall hedgerow boundaries sit around and between the areas of settlement and infrastructure corridors, interspersed occasionally with small geometric woodland blocks. The availability of long distance views varies, influenced by the underlying topography,



with more far-reaching views available from elevated positions in the landscape east of the Site, and shorter close-range views to the west and south.

2.3.4 The landscape around the Site is heavily influenced by the A1(M) which is a visual and audible detractor in the area as a result of traffic and highway infrastructure such as gantries. A further local detractor are the high voltage pylons which cross the landscape to the north-west of the Site.

2.3.5 There are no Public Rights of Way (PRoW) within the Site. The closest PRoW is the Hertfordshire Way which is located along the northern and eastern boundaries of the part of the Site north of Graveley Lane. Part of the Hertfordshire Way along the north-east Site boundary also forms part of National Cycle Network (NCN) Route 12.

2.3.6 The Site is not covered by any statutory or non-statutory landscape designations. The closest statutory landscape designation is the Chilterns Area of Outstanding Natural Beauty (AONB) which is approximately 5.3km west of the Site at its closest point.

2.4 Summary of Landscape Character

2.4.1 The landscape character of the study area has been classified at national, regional, county and district levels. Across all scales of landscape classification, the landscape is identified as a large-scale, open, arable landscape with prominent urban fringes to towns, and with major transport infrastructure and pylons creating an impression of a busy, rural landscape.

2.4.2 The Site is within the Arlesey – Great Wymondley Landscape Character Area (LCA) as defined in the North Herts Landscape Study (NHLS) (CD71). Sensitivities to development for this LCA include protecting the green wedge between Hitchin and Letchworth, avoiding the loss of field boundaries and removal of hedgerows, and avoiding the loss of historic character. The landscape is identified as having expansive views from areas of high ground, but that due to detracting features these views are not always of a high quality.



3.0 THE DESIGN OF THE PROPOSED DEVELOPMENT

3.1 Introduction

3.1.1 In this section I set out the key matters in relation to the design of the proposed development, including how it has responded to local context, and the mitigation that has been integrated to avoid or minimise environmental impacts.

3.1.2 The proposed development went through an iterative design process prior to submission of the planning application, and design development continued through the course of determination of the application in response to consultee comments made by TLP (summarised in the Committee Report, paragraph 4.5.127, CD35a).

3.1.3 The final scheme design as resolved for approval by the planning committee is shown on Planning Drawing 3004-01-012 Rev F Landscape Proposals (CD24).

3.2 Design Response

3.2.1 The design responds to local context by retaining the existing hedgerows and trees in the field boundaries to the Site, and thus maintaining the underlying large-scale field pattern. The proposed development incorporates landscape restoration measures including hedgerows to restore lost field boundaries, and to 'gap up' fragmented hedgerows that are in a poor condition.

3.2.2 The landscape proposals inherent in the design are summarised as follows:

- i) Grassland within the perimeter/stock fencing suitable for sheep grazing, with a sward comprising a broad selection of grasses, herbs and clover that are productive for livestock, and which provide pollen and nectar for biodiversity benefit;
- ii) Species-rich grassland buffers of minimum 12m width between field boundaries and perimeter/stock fencing to contribute to enhancing hedgerow buffer zones for improved ecological connectivity;
- iii) Native-species woodland belt planting approximately 10m wide along the western and northern boundaries of the part of the Site north of Graveley Lane, to provide visual screening, landscape integration, and improved ecological connectivity;



- iv) New native-species hedgerows alongside Graveley Lane and the A1(M) for visual screening and ecological connectivity, and for the purpose of landscape integration;
- v) Gapping up of existing hedgerows around and within the Site which are in a poor and declining condition, with fragmentation reducing their function as ecological corridors and potential for visual screening;
- vi) Woodland copses either side of the Site entrance on the north side of Graveley Lane to limit views into the site from Graveley Lane; and
- vii) Permissive footpaths to provide safe links from the existing public right of way near Milksey Cottages. Two links to the existing Hertfordshire way would be provided. One parallel to Graveley Lane and one perpendicular to Graveley Lane which would deliver circular walking routes for the life of the Proposed Development.

3.3 Native Species Hedgerows

- 3.3.1 New native species hedgerows are proposed along the eastern boundary of the Site adjacent to the A1(M), along the north and south sides of Graveley Lane where the solar fenceline is adjacent to the road, and to restore or create field boundaries.
- 3.3.2 The planting of hedgerows alongside existing road infrastructure is supported by the built development management guidelines for the area identified in the NHLS (CD71) which encourage planting to where possible mitigate or screen existing infrastructure or intrusive features in the landscape. The A1(M) is an existing intrusive feature locally and in the long-term the planting of hedgerows will provide beneficial screening in views from the west.
- 3.3.3 The gapping up and restoration of hedgerow boundaries is also supported by the landscape management guidelines for the local area identified in the NHLS. These guidelines respond specifically to sensitivities identified for the local landscape that include the geometric field pattern with hedgerow boundaries that are vulnerable to loss.

3.4 Native Species Woodland

- 3.4.1 A 10m wide native species woodland belt follows the northern and western boundaries of the part of the Site to the north of Graveley Lane. The primary purpose of this woodland belt is to filter and screen views into the proposed development from



- the Hertfordshire Way, reinforcing the existing intermittent vegetation that sits between the footpath and the Site. In the medium- to long-term this woodland belt will provide effective screening of the proposed development, whilst also providing a locally appropriate context for the long distance path.
- 3.4.2 This woodland belt is continued on the south side of Graveley Lane in two sections as the 'off-site planting', providing further visual screening whilst seeking to improve connectivity between existing woodland blocks around the Site, which would have wildlife and biodiversity benefits.
- 3.4.3 The woodland belt planting is of a scale that responds to the existing local landscape characteristics, and the planting of woodland belts and small-scale woodland copses (such as those proposed around the northern entrance from Graveley Lane) responds to the local built development management guidelines identified in the NHLS (CD71) which encourage the planting of broadleaved woodland to screen development.
- 3.5 Pasture and Grasslands**
- 3.5.1 The proposed development includes low maintenance pasture within the fenceline for the solar areas, with the intention that these areas would be grazed whilst the scheme is operational.
- 3.5.2 Areas of species rich grassland are proposed in 12m buffer zones between the solar fenceline and existing hedgerow or field boundaries to create enhanced biodiversity corridors.
- 3.5.3 Two larger areas of meadow grassland are proposed in the part of the Site north of Graveley Lane. One area is to the east adjacent to the A1(M), and one is to the west adjacent to Graveley Lane.
- 3.5.4 The meadow area adjacent to the A1(M) is necessitated by the presence of an easement for a high pressure gas main whereby neither planting or development are permitted in proximity to the pipelines. This provides a benefit in maintaining an open aspect to the west from the most elevated part of the Site where the Hertfordshire Way passes between the Site and the A1(M). As demonstrated by the photomontages on Figures 9b and 9c (CD74 to CD77), the offset to the solar arrays allows partial views towards the distant hills to be retained.

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3.5.5 The meadow area in the west of the Site adjacent to the north side of Graveley Lane provides a set back from Graveley Lane and increases the perceived separation from Great Wymondley. This in combination with the woodland copses around the Site entrance restrict views of the proposed development for people travelling west along Graveley Lane. This also benefits as a substantial area of meadow for biodiversity enhancement.

3.6 Permissive Paths

3.6.1 Two permissive paths are incorporated with the proposed development to increase the recreational value of the landscape. One runs parallel to Graveley Lane and one perpendicular to Graveley Lane which together would deliver circular walking routes for the life of the Proposed Development.

3.6.2 The route parallel to Graveley Lane connects PRow 05 in Great Wymondley and PRow 01 (Hertfordshire Way) adjacent to the A1(M).

3.6.3 The route perpendicular to Graveley Lane connects Graveley Lane and the Hertfordshire Way along the western boundary of the part of the Site north of Graveley Lane.

3.6.4 The permissive paths are shown on Drawing 3004-01-12 Landscape Proposals Rev F (CD24).



4.0 THE LVIA PREPARED FOR THE APPLICATION

4.1 Introduction

4.1.1 In this section of my proof I provide an overview of the LVIA work undertaken by the Applicant.

4.2 The LVIA

4.2.1 The Planning Application submitted in December 2021 was accompanied by a Landscape and Visual Impact Assessment prepared in accordance with current best practice guidance as presented in 'Guidelines for Landscape and Visual Impact Assessment', 3rd Edition, hereafter referred to as GLVIA (CD66). The LVIA and its supporting Appendices are presented as CD4. The LVIA was undertaken by an experienced Chartered Landscape Architect.

4.2.2 The LVIA is supported by illustrative figures including mapping of Zones of Theoretical Visibility (ZTVs), and photomontages. The ZTVs and photomontages have been updated to reflect changes in the layout of the proposed development adopted during the course of determination of the planning application, and are submitted as part of the Core Document library for this call-in inquiry, references CD72 to CD85.

4.2.3 Effects on landscape character were assessed with reference to the Arlesey – Great Wymondley LCA identified in the NHLS (CD71). This is considered an appropriate and proportionate level of assessment for the proposed development. Supporting text to '*Policy NE2: Landscape*' of the North Hertfordshire Local Plan (NHLP) specifically references the NHLS in relation to landscape sensitivity, and in turn decision making (paras 11.7-11.8, CD39). The NHLS is also directly referenced within '*Policy NHE1 Landscape Character*' of the Wymondley Neighbourhood Development Plan (WNDP) (CD40).

4.2.4 The LVIA concludes that the proposed development would not result in the loss of key components of landscape fabric (the underlying topography and existing vegetation patterns). The LVIA concluded that the landscape effect at the level of the Site would be moderate to major adverse as a result of the change in land use and introduction of solar panels and associated infrastructure (para. 5.3.13, CD4). I agree with this conclusion. Beneficial changes with respect to restoring and strengthening



- the landscape structure would reduce the effect at the site level, but would not wholly mitigate for the extent of solar infrastructure introduced across the Site.
- 4.2.5 The LVIA concludes that the impact on the Arlesey – Great Wymondley LCA in the area around the Site would be minor to moderate adverse in the short- and long-term. This would be as a result of the increased perception of built development that would reduce the scenic beauty and sense of tranquillity in the landscape at a localised level.
- 4.2.6 The proposed development includes proposed planting (described in more detail in Section 4.0 of my proof) that would provide a greater level of enclosure in the medium- and long-term, and improve the condition of landscape elements, but would not reduce the overall magnitude of effect on landscape character. I agree with the conclusion of the LVIA that there would be a minor to moderate adverse level of effect at a localised level around the Site during the operational life of the proposed development.
- 4.2.7 In relation to visual effects the LVIA identifies that due to the relatively low height of the proposed development components, the presence of existing screening around the Site, and the influence of landform, it would be of limited visibility from the wider landscape. Following my field work in July 2023 I would agree with this, and that the proposed development would either not be visible from much of the surrounding area, or where visible would be at a distance such that it is not a prominent feature and would appear as a tonal change assimilated into views of the existing and proposed vegetation.
- 4.2.8 The LVIA concludes that there would be short-term moderate to major adverse visual effects from a short section of the Hertfordshire Way as it passes along the northern Site boundary. It concludes there would also be moderate to major adverse visual effects from Graveley Lane as it passes through the Site. In both cases the effects are attributable to the close proximity of the receptors to the proposed development. The LVIA notes that the routes are lined by existing vegetation and therefore the magnitude of effect is not experienced as a constant for users of the routes. The LVIA determines that once the proposed hedgerow and woodland belt planting alongside these routes has established then the proposed development would be largely screened, and the effects would reduce to minor to moderate adverse in the medium- and long-term. I agree with these findings.

- 4.2.9 The LVIA concludes that there would be no residual significant adverse landscape or visual effects, and that residual adverse landscape and visual effects would only be experienced in a localised area to the Site. I agree with these conclusions.
- 4.2.10 I note that the LVIA does not include an assessment of the grid connection to Wymondley Substation. However as the grid connection would only require temporary works within the highway corridor I agree with the omission of a detailed assessment of its landscape and visual effects. The grid connection would likely bring a level of temporary disruption at a local level, but as the cabling is all below ground this would not result in adverse landscape and visual effects that warrant assessment and reporting. Once the proposed development is operational the grid connection would not result in any landscape and visual effects.

4.3 Consultation Responses

- 4.3.1 NHDC instructed The Landscape Partnership (TLP) to undertake an independent review of the LVIA during the determination of the planning application. The 'TLP Review' is included in the Core Document library as CD86.
- 4.3.2 The TLP Review acknowledges at paragraph 2.3.3 that it should '*be noted that different practitioners professional judgement may result in differing conclusions about the levels of effect that may arise from the same proposals*'.
- 4.3.3 The TLP review summarises its findings in the conclusion section as a series of bullet points. (paragraph 7.1.1, CD86).
- 4.3.4 The conclusions set out by TLP demonstrate there is general agreement with the findings of the Applicant's LVIA. However, I note the following differences of opinion in quoted italics which I discuss further beneath each statement.

The approach adopted in the LVIA to the assessment of effects on landscape character focuses on the effects at a District Scale. While this is an appropriate scale to assess the proposals there is very limited coverage of assessment at the National, Regional and more importantly local and site scale which are all relevant.

- 4.3.5 The purpose of the LVIA was to provide a proportionate assessment of the proposed development to inform the decision maker as to the acceptability of the scheme in policy terms. The supporting text to Policy NE2 of the NHLP is clear that the District-

- scale landscape character areas identified in the NHLS are of relevance to Policy NE2. The National, Regional or other landscape assessments are not referenced in NE2. The WDNP which covers the parish of Wymondley also makes reference to use of the NHLS for assessment.
- 4.3.6 Landscape character assessments at the National and Regional scale have been included in the baseline of the LVIA to provide context. However, it is correct to say that the effects on these have not been assessed. In my opinion this is a proportionate approach as an assessment at a broader national or regional scale would simply identify a lesser level of effect than at a district-scale. In my view such assessment would therefore not necessarily help the decision maker.
- 4.3.7 I note that TLP have undertaken this assessment themselves in Table 1 of the TLP Review and concluded the landscape effect to be minor adverse at a national and regional scale in the short- and long-term. I agree with this assessment at a regional scale, but at the scale of the National Character Area (NCA 87) I would assess the magnitude of impact as being closer to negligible in view of the very large scale of the NCA.
- 4.3.8 With respect to local landscape character areas. It would have been possible to identify such areas and then undertake an assessment of effects, however in my view this would not have provided new information to the decision maker that is not already provided in relation to the assessment of the District character areas. I am satisfied that use of the District LCA was the appropriate level of assessment, and this accords with Policy NE2.
- TLP consider there would be a relatively higher effect on LCA 216 Arlesey /Great Wymondley at Moderate adverse compared with the LVIA at Moderate to Minor at Year 1 and Year 10. The difference between the LVIA and TLP is based on TLP identifying a relatively higher sensitivity at Medium to the proposals compared with Low to Medium in the LVIA. Effects at the NCA and RCT level are agreed to not be significant.*
- 4.3.9 The judgement in the LVIA that the Arlesey – Great Wymondley LCA is of medium to low sensitivity is set out transparently in Appendix 1 (CD4). The LVIA considers landscape sensitivity around the Site to be greater than the low sensitivity identified for the whole LCA in the NHLS (page 108, CD71), in part for the reasons identified



in the TLP Review. The NHLS identifies ‘*There is significant urban influence and numerous landscape detractors.*’ The LVIA finds that the part of the LCA where the Site is located includes major transport corridors that reduce tranquillity and sense of remoteness and comprises a fairly simple pattern of large-scale fields divided by hedgerows or tree belts. The landscape is not designated. The LVIA therefore finds a balance between the low sensitivity identified by the NHLS, and characteristics the LVIA associates as being slightly greater than low sensitivity. The judgement therefore is that the LCA is of low to medium sensitivity. I agree with this position and in particular consider that the proximity to the A1(M) and the large scale field pattern reduce the susceptibility of the receiving landscape to change from solar development, such that its sensitivity is less than medium.

In visual terms the LVIA identifies that there would be some significant visual effects in the short term at levels of Moderate to Major Adverse on receptors at the following locations: Hertfordshire Way – including Viewpoints 1, 2 and 3 and from one location on Graveley Lane - Viewpoint 5. TLP agree that there would be significant effects at these locations (and other points in the vicinity on the Hertfordshire Way and Graveley Lane). TLP also identify a significant effect in the short term on Footpath 7 to the south of Great Wymondley. Effects on receptors at Viewpoints 1-3, 5 and 7 are considered by TLP (and the LVIA) and to reduce to levels below significant at Year 10 to Moderate Adverse. TLP agree that effects at greater distance are limited in extent and level and would not be significant individually or in combination.

- 4.3.10 The LVIA and the TLP Review agree that there would be no residual long-term significant adverse visual effects. The only disagreement is that in the short-term the TLP Review identifies an additional significant effect from Viewpoint 7. Viewpoint 7 is located to the south of Great Wymondley. The view is from a public footpath that is part of the Hertfordshire Way, where the footpath emerges to the east side of a hedgerow/tree belt. The hedgerow/tree belt screens or filters views towards the Site from its west. The viewpoint therefore represents the view available over a very short section of footpath where the proposed development would be partially visible in the background of the view, below the skyline, and with the existing field pattern still perceptible (CD84 and CD85). The LVIA reported a moderate adverse but not significant effect.

4.3.11 Considering Table 2 of the TLP Review the assessment made for Viewpoint 7 by TLP is the same in respect of magnitude of impact being medium in both the short- and long-term. However, the TLP Review concludes a greater level of visual effect than the Applicant's LVIA. As noted in paragraph 5.3.9 of the TLP Review (CD86), this is because TLP assesses the receptor as being of high sensitivity, where the LVIA assesses the receptor as being of medium to high sensitivity. The TLP Review does not set out a justification for how they reached a judgement of high sensitivity. The LVIA sets out transparently why the receptor has been assessed as medium to high sensitivity, and that this is because the viewpoint is not a recognised viewpoint, and the view is an ordinary but not unattractive view across countryside despite being from a long-distance trail. In my opinion a judgement of either high sensitivity or medium to high sensitivity are both legitimate conclusions that a Landscape Architect could reach.

4.3.12 Ultimately, the TLP Review concludes that:

In conclusion TLP consider there would be significant effects on both landscape character at the Site and local scale in the short and long term. TLP consider there would not be significant effects on the district scale character area LCA 216 overall or any wider landscape receptors. TLP also consider there would be significant effects on selected visual receptors in close proximity to the Site and immediate area in the short term. By the medium term (Year 10 onwards) the mitigation should reduce the visual effects so they are not significant.

4.3.13 I would agree with the overall conclusion provided by TLP, although consider the medium term to be years 5 to 10, and the long-term from year 10 onwards.

4.3.14 It is reasonable to assume that the proposed planting would have established as effective screening in the medium term between years 5 to 10. A well-managed hedgerow will typically grow between approximately 0.4 and 0.6m per year. Over a five year period a hedgerow would therefore reach between 2m and 3m in height. The proposed fencing around the proposed development is 2.1m in height, with the solar arrays 3m in height. In the medium term the proposed planting would therefore provide reasonably effective screening of the proposed development. The TLP Review is perhaps conservative in finding that the mitigation would only reduce the visual effects so they are not significant from year 10 onwards.

4.4 Further Submissions

- 4.4.1 The TLP Review recommended a number of design changes to further reduce the landscape and visual impacts of the proposed development.
- 4.4.2 The design changes and TLP's further review of the scheme design are summarised in CD33.



5.0 GREEN BELT

5.1 Introduction

5.1.1 The Site is within Green Belt. Essential characteristics of the Green Belt are openness and permanence. Whilst Green Belt is not designated to preserve landscape quality or visual amenity, case law has established that the openness of Green Belt has a visual dimension (CD118).

5.1.2 The findings of a LVIA are often referred to when considering the acceptability of a development in Green Belt. However, case law has also established that the visual impact of development on the openness of Green Belt is but one matter that may be considered as part of a wider planning judgement on potential harm to the Green Belt (CD119).

5.1.3 I consider in this section the relationship between the visual impact of the proposed development, and the harm to the openness of the Green Belt.

5.2 Openness of Green Belt

5.2.1 In determining what factors can be considered when assessing the impact of a proposal on the openness of the Green Belt, planning practice guidance published by the Government states that this '*requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:*

- i) openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- ii) the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- iii) the degree of activity likely to be generated, such as traffic generation.'*

5.2.2 I consider only the first point in relation to spatial and visual aspects of openness.

5.2.3 Although the NPPF refers to the 'openness' of the Green Belt, it does not provide a specific definition. As a result, there have been several court decisions on the proper



interpretation of the Green Belt provisions within the NPPF, including in respect of openness. One of the main topics has been the correlation between the concepts of 'openness' and 'visual impact'. More recent judgements have determined that there are two distinct concepts to the assessment of a development's impact upon the openness of the Green Belt. They comprise:

- i) Impact on 'actual' openness – the concept that openness relates to the absence of buildings and any 'inappropriate' built development in the Green Belt would therefore impact upon openness; and
- ii) Impact on 'perceived' openness – would the presence of the development alter the overall perception of openness within the Green Belt.

5.2.4 I consider the impact on 'actual' openness to relate to spatial change. I consider the impact on 'perceived' openness to relate to visual change.

Impact on Spatial Openness

5.2.5 On the basis that the concept of openness relates to the absence of built development, the introduction of any 'inappropriate' built development in the Green Belt would, therefore, impact upon openness.

5.2.6 It is the case that the proposed development would introduce built development in the form of solar arrays and associated infrastructure and that this would result in an incremental impact upon the openness of the Green Belt.

5.2.7 This impact is moderated by the fact the proposed development has a very low physical footprint in relation to the extent of the Site. The arrays are set out in rows set 5m apart allowing views through the solar farm, and are set on lightweight frames such that there is open 'airspace' beneath and between the panels, and functional soil beneath. This means that despite the introduction of solar panels across much of the Site, the Site would continue to function as agricultural land through the productive grazing of livestock.

5.2.8 The solar panels and associated infrastructure are all low-lying features with a maximum height of approximately 3m. They would therefore not introduce large, bulky and overly obtrusive built forms, and indeed they are capable of being hidden from view by normal components of the landscape such as woodlands and hedgerows. The existing presence of such features in the vicinity of the Site,



combined with the introduction of further such features by way of mitigation mean that the impact upon the 'perceived' openness of the Green Belt (dealt with in the next section) would be kept to an absolute minimum without compromising the overall purpose of the Proposed Development to generate renewable energy.

Impact on Visual Openness

- 5.2.9 An important factor in respect of the impact upon the perception of openness in the Green Belt is the wider landscape and visual setting and how the perception of openness within that setting would change following the introduction of a development.
- 5.2.10 The ZTV for the proposed development (CD73) demonstrates that the existing topography and pattern of vegetation generally limit the overall potential visibility of the proposed development to highly localised areas around the Site. In addition, the ZTV and LVIA (CD4) demonstrate that the proposed development would not be visible from within the closest settlements of Great Wymondley, Little Wymondley, and Graveley; and in addition would not be visible from the large built-up areas of Hitchin, Letchworth and Stevenage.
- 5.2.11 As stated above, the nature of this type of development is such that it can readily be concealed by normal components of the landscape. The presence of woodlands and hedgerows, and the addition of new such features makes it possible for the perceived impact on openness to be very limited and for it to be reduced over time.
- 5.2.12 The LVIA summarised the impacts to the perceived openness and permanence of the green belt as follows:

In the short-term, the proposed development would have an impact on the perceived openness of views at intermittent locations around the Site boundary through the introduction of solar panels and associated infrastructure into the foreground of views.

In the medium- and long-term, the proposed development would be predominantly screened from these views once the proposed planting has established, albeit the proposed mitigation planting would still partially reduce the perceived openness through the curtailment of views.



However, this is the case for existing vegetation within the green belt that is characteristic of the area.

From the wider landscape beyond the Site boundary, the low height of the proposed development and the distant nature of views are such that whilst the proposed development may be visible it would form a small proportion of the overall view and would be seen in the context of existing development in the view, such that the perceived openness of views would be unchanged.

The landscape and visual effects are easily reversible at the end of the operational life of the proposed development, such that once decommissioned the Site's existing characteristics could be restored at any time.

Conclusion

5.2.13 I agree with the conclusions of the LVIA that the proposed development would materially harm the perceived openness of the green belt in the short-term, and I conclude that the level of harm would reduce as planting establishes and screens the development. The development is temporary in nature albeit that this would be for a relatively long period of time (40 years). It is the case (accepted by the Council) that the measures introduced to protect existing landscape elements and introduce new ones should leave the landscape in a better condition after decommissioning than exists now.

5.3 Relevant Planning Appeal Decision – Land east & west of A130 and north & south of Canon Barns Road, Chelmsford

5.3.1 The Planning Inspector appointed for a recent planning appeal for a proposed 49.9MW solar farm in the green belt on 'Land east & west of A130 and north & south of Canon Barns Road in Chelmsford' (the 'Chelmsford Site') considered the harm caused by a solar development to the openness of the green belt (CD122).

5.3.2 The Chelmsford Site differed from the Site in that it was crossed by several public rights of way, which were retained such that users of the routes pass through the solar farm. By comparison at the Site the nearby public rights of way only pass

around the solar farm. A similarity between the Site and the Chelmsford Site is that the sites are divided by roads.

5.3.3 The appellant for the Chelmsford Site had concluded major adverse visual effects for users of the footpath through the site, reducing to moderate adverse in the medium- and long-term as planting establishes to screen the development.

5.3.4 The LVIA for the Site subject to this call-in inquiry (CD4) concludes moderate to major adverse effects from footpaths around the site boundary, reducing to minor to moderate adverse in the medium- and long-term as planting establishes to screen the development.

5.3.5 The planning inspector concluded (paragraphs 13 and 14, CD 122) that:

‘the proposed solar arrays would introduce substantial development into the area in terms of ground cover due to the quantity of arrays within the scheme. Furthermore, the associated access track, substation, inverter stations, fencing and CCTV facilities would result in additional built form that would further diminish the openness of the Green Belt spatially.

Nevertheless, the proposed solar arrays would be relatively modest in mass and footprint and would be spaced out at regular intervals reducing the overall scale of the development. Furthermore, the scheme would be in place for a temporary 40-year period. It would then be fully demounted, and land returned to its former condition, at the end of its use. As such, whilst 40 years is a long period of time, it is not permanent. Therefore, the impact on the openness of the Green Belt would be reduced with the site ultimately reinstated to its former open character. Consequently, both visually and spatially, the proposed development would result in moderate harm to the openness of the Green Belt.

5.3.6 It is my opinion that there are similarities between the Chelmsford Site and the Site, but that comparatively the Chelmsford Site resulted in a greater level of visual effect. In relation to visual aspects of the openness of the green belt it is reasonable to conclude that the level of harm at the Chelmsford Site would therefore be greater than at the Site.

5.3.7 In Table 2 of the NHDC Committee Report (CD35a) the Case Officer summarised the benefits and harms of the proposed development. The Officer concludes a significant harm to the openness of the green belt. In my opinion the harm to the openness of the green belt has been overstated and for consistency with the findings of the Planning Inspector at the Chelmsford Site, the harm to the openness of the green belt is at most, moderate.

5.4 Assessment of Any Other Harm – Landscape and Visual Harm

5.4.1 In determining whether very special circumstances exist to justify development in the Green Belt, consideration has to be given as to whether the benefits of the proposed development outweigh the harm to the Green Belt by reason of inappropriateness, and ‘any other harm’. The landscape and visual impact of the proposed development falls into the category of ‘any other harm’.

5.4.2 The landscape and visual effects of the proposed development are summarised in Section 4.0 and 6.0 of this proof. The conclusion by both the Applicant and NHDC is that there would be no residual significant adverse landscape or visual effects, and that residual adverse landscape and visual effects would only be experienced in a localised area close to the Site.

5.4.3 NHDC assess the proposed development to be in conflict with NHLP Policy NE2, which seeks to avoid *unacceptable* harm to landscape character and appearance.

5.4.4 I disagree that the conclusions reached equate to *unacceptable* harm, as set out in Section 8.0 of this proof.

5.4.5 I have considered in Section 8.2 the proposed development against each of the criterion of Policy NE2, including a detailed appraisal of the relevant sensitivities and management guidelines for the local landscape. Whilst there may be localised adverse landscape and visual effects resulting from the proposed development, I consider the level of landscape and visual impact to be very modest and not equivalent to *unacceptable* harm.

5.4.6 I therefore conclude that the proposed development would not be in conflict with Policy NE2.

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- 5.4.7 In the NHDC Committee Report (CD35a) and SoC (CD138) the Council attaches moderate weight to the landscape and visual harm resulting from the proposed development (CD138, paragraph 5.24).
- 5.4.8 In my opinion the weight given to landscape and visual harm should certainly be given no greater weight than moderate given the limited scale and extent of the effects. Moreover, I would go further and say that having found the proposed development to be compliant with Policy NE2 (in contrast to NHDC who found the proposed development to conflict with the policy) I believe there is justification to say that on this basis the weight attributable to landscape and visual harm should in fact be less than moderate.



6.0 MATTERS RAISED BY NHDC

6.1 Introduction

6.1.1 In this section I consider the matters raised by NHDC firstly in the Committee Report (CD35a) and then in their Statement of Case.

6.2 Committee Report

6.2.1 The Committee Report (CD35a) considers the landscape and visual impact of the proposed development at paragraphs 4.5.111 to 4.5.130.

6.2.2 The Committee Report summarises the landscape and visual effects reported in the Applicant's LVIA (CD4) and the TLP Review (CD86), identifying that there are slight differences of professional opinion between the two.

6.2.3 The Officer concludes that the proposed development 'would inevitably have some adverse landscape and visual impact, but that due to a combination of topography, existing screening, and the provision of landscaping, in this instance the adverse effects would be localised (paragraph 4.5.130). The Officer notes that the proposed mitigation would be beneficial to the landscape and biodiversity, and that following decommissioning there would be no residual adverse landscape effects (paragraph 4.5.130).

6.2.4 Having reached these conclusions, the Officer identifies the proposed development would be in conflict with NHLP Policy NE2, which seeks to avoid unacceptable harm to landscape character and appearance. I disagree that the conclusions reached equate to *unacceptable* harm. I address this in detail in Section 8.0 of this proof.

6.2.5 A further relevant point in the Committee Report is the finding that the Site is not within a valued landscape for the purpose of paragraph 174b of the NPPF (para 4.5.124, CD35a). I address this within Section 7.10 of my proof.

6.2.6 The Officer attaches moderate weight to the landscape and visual harm for the purpose of a planning balancing exercise (paragraph 130). At paragraph 4.7.2 stating:

There is a circular argument for and against the proposal. The greater the renewable energy generation the greater the weight given to this as a

material consideration, but with that comes the greater spatial and visual impacts. Notwithstanding the large scale of the proposal, the landscape impacts are relatively localised due to topography and existing landscaping, whereas the renewable energy generation would be substantial compared to existing renewable energy generation in North Hertfordshire.

6.2.7 The Officer recommends a grant of planning permission, noting that the proposed development is considered sustainable development, and that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 4.8),

6.3 Statement of Case

6.3.1 The NHDC SoC (CD138) sets out the Council's case is that planning permission should be granted for the proposed development (paragraph 1.5).

6.3.2 The NHDC SoC reaffirms the logic set out in the Committee Report, stating at paragraph 5.24 that the Council consider that the proposed development '*would inevitably have some adverse landscape and visual impact but that this would be localised.*'

6.3.3 NHDC confirm their position that the proposed development would conflict with Policy NE2 of the NHLP, but that as the landscape and visual harm is not permanent they consider that only moderate weight should be attributed to the landscape and visual harm of the proposed development.

6.3.4 The NHDC SoC confirms the Council's opinion that the Site is not within a valued landscape for the purpose of paragraph 174b of the NPPF.

6.3.5 I agree with the NHDC Committee Report and SoC that the Site is not in a valued landscape for the purposes of the NPPF; that the proposed development would result in adverse landscape and visual harm at a localised level; and that there would not be any residual permanent adverse landscape and visual harm once the proposed development is decommissioned.

6.3.6 I disagree that the proposed development would conflict with Policy NE2 of the NHLP, which I address later in Section 8.0.

7.0 MATTERS RAISED BY THIRD PARTIES

7.1 Introduction

- 7.1.1 In this section of my proof I consider relevant matters raised by third parties.
- 7.1.2 Three of the submitted representations raise matters pertinent to landscape and visual impact that I wish to respond to.

7.2 Representation by Mrs G Flynn - Objects

- 7.2.1 Statements in italic quotations below are extracted from the letter of objection submitted by Mrs G Flynn.

The hedgerows that run alongside the footpath are full of blackberry bushes and families can be seen picking the fruit when in season – these bushes will disappear.

- 7.2.2 The hedgerows alongside the public rights of way around the Site would all be retained and protected during construction. They will not disappear. In addition, the proposed new hedgerows, gapping up of hedgerows and woodland planting alongside the existing public rights of way combined with the new proposed permissive paths would greatly increase foraging opportunity for both people and wildlife.

The stunning views currently enjoyed across the hamlet of Great Wymondley, Hitchin and the Chilterns AONB on the horizon (see attached photos) would be completely obliterated by 150,000 solar panels.

- 7.2.3 Mrs Flynn attaches two photos, IMG_5034 and IMG_5035.
- 7.2.4 IMG_5034 appears to be taken from the Hertfordshire Way at a point between Viewpoints 1 and 2 as assessed in the Applicant's LVIA (CD4). This would seem to be confirmed in the metadata of the photograph which provides a GPS location as:

Latitude: 51; 56; 33.87

Longitude: 0; 12; 55.76

Altitude: 110.3m AOD

(Equivalent easting and northing: 522760, 228642)

- 7.2.5 The photograph therefore does demonstrate a short section of footpath between Viewpoints 1 and 2 where views towards the distant hills in the background of the view would be partially lost. The receptor has been assessed in the LVIA with reference to Viewpoints 1 and 2 and concludes short-term moderate to major adverse effects, reducing to moderate to minor in the long-term.
- 7.2.6 IMG_5035 does not appear to be a view towards the Site, and in fact the Site is not visible in the photograph. The photograph metadata gives a GPS location of:
- Latitude: 51; 56; 57.74*
Longitude: 0; 12; 46.05
Altitude: 112.2m AOD
(Equivalent easting and northing: 522927, 229384)
- 7.2.7 This puts the photograph at the eastern end of Bridleway 002 in the parish of Letchworth Garden City, approximately 575m north-east of the Site looking due west. This position is approximately 300m east of Viewpoint 9 of the LVIA.
- 7.2.8 The vegetation in the left hand side of the photograph screens views towards the Site. The proposed development would not be visible, and views across the fields in the foreground and towards the hills and Chilterns AONB in the background of the view would be retained.
- 7.2.9 Collectively, IMG_5034 and IMG_5035 demonstrate quite clearly that whilst locally views towards these hills from a short section of footpath adjacent to the eastern boundary of the Site would be lost, the opportunity to enjoy views from the local area across open countryside towards hills and the Chilterns AONB would remain.
- 7.2.10 I therefore consider that the comment by Mrs Flynn that '*views currently enjoyed across the hamlet of Great Wymondley, Hitchin and the Chilterns AONB on the horizon would be completely obliterated*' very much overstates the nature of change that would in reality occur.

This application is contrary to solar industry guidance. This guidance says that preferred locations for solar installations are on level ground in visually well-screened areas i.e. where they cannot be easily seen from public rights of way and not on designated protected land such as Green Belt.

- 7.2.11 The Draft National Policy Statement (NPS) for Renewable Energy Infrastructure EN-3 (CD60) sets out from paragraph 3.10.9 to paragraph 3.10.39 the factors that Government expect to influence site selection and design.
- 7.2.12 Paragraph 3.10.12 states that *'Utility-scale solar farms are large sites that may have a significant zone of visual influence. The two main impact issues that determine distances to sensitive receptors are therefore likely to be visual amenity and glint and glare.'*
- 7.2.13 Paragraph 3.10.28 states that *'Applicants are encouraged where possible to minimise the visual outlook from existing public rights of way, considering the impacts this may have on any other visual amenities in the surrounding landscape.'*
- 7.2.14 The NPS does not advise that preferred locations for solar installations are *'on level ground in visually well-screened areas'*. It instead takes a more pragmatic and strategic approach and acknowledges that visual impact is likely to be a consideration in site selection, and that applicants should where possible look to minimise visual impact.
- 7.2.15 The design of the proposed development has maintained a stand-off from the Hertfordshire Way in the east of the Site, adjacent to Viewpoint 1 of the LVIA (CD74 to CD77) to reduce the visual impact on users of the route. This in combination with the extent of proposed planting around the boundaries of the proposed development is intended to minimise visual impact.

Will I be able to make this walk whilst this site is under construction? Very doubtful considering the heavy plant that will be in the area and once completed, my option will be to walk alongside security fencing with CCTV cameras and no views.

- 7.2.16 The Site is not crossed by any public rights of way. Public rights of way around the northern perimeter of the Site would remain open throughout construction.
- 7.2.17 There would be sections of footpath along the Site boundary where construction activity would be visible and where views across open fields would be restricted. However, as demonstrated by IMG_5035 submitted by Mrs Flynn, comparable views from other footpaths in the local area would not be affected by the introduction of the

proposed development, and it is my opinion that there would still be plentiful opportunity to enjoy the countryside of the local area.

7.3 Representation by Dr R Riches-Duit - Supports

7.3.1 The statement in italic quotations below is extracted from the letter of support submitted by Dr R Riches-Duit.

if the solar farm is approved, there are steps that can be taken to appease those affected by the view (e.g. bunding).

7.3.2 The suggestion of alternative forms of visual mitigation is welcome, however bunding as a form of screening for solar farms tends to be fairly incongruous in views, and not a sympathetic or natural design response that is in keeping with landscape character.

7.3.3 To screen solar arrays in close views the bunds would have to be over 2m in height, which if gradients of 1:3 are used would require a width of at least 12m. This in turn would require a substantial amount of soil to either be stripped from the site to form the bund, or imported from elsewhere. As engineered earthworks, earth bunds can appear abruptly out of character in relation to natural topography.

7.3.4 The landscape management and built development guidelines for the local area focus on the use of planting to minimise the visual intrusion from new development. The LVIA demonstrates that such measures would be effective in mitigating effects in the medium- and long-term.

7.3.5 I therefore disagree that bunding would be an appropriate form of mitigation in this instance.

7.4 Representation by the North Herts & Stevenage Green Party - Supports

7.4.1 The statement in italic quotations below is extracted from the letter of support submitted by the North Herts & Stevenage Green Party.

We sympathise with the major concern of the very high fences (4m) with many CCTV. This risks it looking like a prison, adding an unnecessary environment destructive dimension to this project, and which is far from

visually appealing! But the real concern is the restrictions on wildlife that will lose free movement.

- 7.4.2 The CCTV poles would have a maximum height of 4m and would be located intermittently around the boundary of the proposed development, at intervals of approximately every 200m.
- 7.4.3 The height of the proposed fencing is approximately 2.1m, as shown on Drawing 3004-01-010 Rev A (CD22). The fencing includes small mammal gates to reduce the restriction on wildlife moving across the landscape, but as functional livestock fencing there would inevitably be restrictions to some species. The effects on wildlife and biodiversity are set out in the proof of Mr Howard Fearn. The proposed deer / stock fencing is sympathetic with a rural environment constructed out of timber stakes and galvanised wire mesh.. The fencing would also be screened by planting in the medium- and long-term.

8.0 COMPLIANCE WITH POLICY

8.1 Introduction

8.1.1 In this section of my proof I consider Local Development Plan Policy NE2: Landscape, and Paragraph 174 of the NPPF.

8.2 Policy NE2: Landscape

8.2.1 Policy NE2 states that:

Planning permission will be granted for development proposals that:

- a) *Respect the sensitivities of the relevant landscape character area and have regard to the guidelines identified for built development and landscape management;*
- b) *Do not cause unacceptable harm to the character and appearance of the surrounding area or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this;*
- c) *Are designed and located to ensure the health and future retention of important landscape features; and*
- d) *Have considered the long-term management and maintenance of any existing and proposed landscaping.*

8.2.2 The supporting text for Policy NE2 confirms that references to sensitivities and management guidelines are in relation to the relevant landscape character area (LCA) of the NHLS, which for the Site is the Arlesey-Great Wymondley LCA.

a) **Respect the sensitivities of the relevant landscape character area and have regard to the guidelines identified for built development and landscape management**

8.2.3 I firstly consider with regards to point a) how the proposed development has respected the sensitivities of the LCA.

8.2.4 The North Herts Landscape Study identifies the LCA (CD71) as being of **low landscape sensitivity** as there is significant urban influence and numerous



landscape detractors. It is identified as being of **low to moderate visual sensitivity** as views are relatively open and would be sensitive to the introduction of further urbanising features which detract from character. Overall the LCA is established as being of **low landscape value** due to the large number of roads and transport routes, and the presence of significant settlement to the fringes.

8.2.5 The following landscape sensitivities are identified for the LCA:

Landscape Sensitivity	Response	Proposed Development:		
		Supports	Neutral	Conflicts
<p>The character area is largely rural but is influenced by the pressures of urban areas and significant infrastructure systems. The core of the area is defined by the extents of Hitchin and Letchworth and would be vulnerable to development pressure. However the area should be retained as a green wedge between the two towns.</p>	<p>With reference to LVIA Figure 7 (CD4), the Site is not located within the 'core of the area' between Hitchin and Letchworth.</p> <p>The green wedge is not identified spatially on any plans. I would consider the green wedge to broadly cover the land between Wymondley/William Road and Arlesey New Road on the basis this area forms a relatively narrow wedge between the two settlement boundaries of Hitchin and Letchworth.</p> <p>The separation between the two settlements would be retained, and I therefore consider the green wedge to be retained.</p>		✓	
<p>There is a gradual change in landform and character from historic enclosed rolling arable landscape of the south to flat expansive arable fields in the north, creating a fragmented landscape character. The south of the character area would be vulnerable to loss of its historic character.</p>	<p>The Site is in the south of the character area but adjacent to the A1(M) and separate from any conservation areas, scheduled monuments or listed buildings. There would be no loss to visible aspects of the landscape that contribute to historic character.</p> <p>The landscape pattern of the Site comprises large-scale arable fields adjacent to a major road corridor and does not exhibit what I would consider the typical characteristics of a historic landscape, such as small-scale pasture or arable fields. Such a landscape pattern is more evident around the fringe of Great Wymondley and further south around Little Wymondley.</p>		✓	



<p>The character area has large arable fields with geometric regular patterns. The majority of boundary hedgerows to the north have been removed. The character area would be vulnerable to further removal of any existing field boundaries.</p>	<p>The hedgerows of the Site would be retained in full, and proposed hedgerow planting would reinforce the hedgerow and field pattern providing long-term benefit.</p>	<p>✓ (long-term)</p>		
<p>The southern area is characterised by the limited woodland of the character area. Generally in the form of small copses associated with isolated settlements. The woodland is vulnerable to lack of management or removal.</p>	<p>The Site does not include any areas of existing woodland and protects all existing woodland around its boundaries. The proposed development also includes several woodland belts and small woodland copses that would support the underlying landscape characteristic of woodland in the area and provide long-term benefit.</p>	<p>✓ (long-term)</p>		
<p>The southern area is also characterised by winding lanes with tall hedgerows and some hedge banks, particularly adjacent to the historic settlement of Great Wymondley. The area would be vulnerable to improvements or upgrading of the minor roads or any removal of the hedgerows.</p>	<p>The winding lanes around Great Wymondley would be unaffected and there are no highway upgrades or hedgerow removals proposed. The eastern end of Graveley Lane where access is proposed is not a winding lane with tall hedgerows and is therefore not vulnerable in the same way.</p>		<p>✓</p>	
<p>The River Ivel crosses the north east of the character area. It is a well vegetated corridor including Alder, Ash, Willow, Sycamore and Beech. The removal or inconsistent management of these corridors would be detrimental to the character area.</p>	<p>This is not relevant to the Site.</p>		<p>✓</p>	
<p>Recreation facilities in the area such as Letchworth Golf Course add to the urbanised characteristics. The character area is vulnerable to further conversion of natural elements into recreational facilities.</p>	<p>This is not relevant to the Site.</p>		<p>✓</p>	
<p>Electricity pylons stride through the character area in the south and Pix Brook sewage works in the north are existing detractors to the character of the area.</p>	<p>This is not relevant to the Site.</p>		<p>✓</p>	
<p>The transport infrastructure is also a detractor. The A1 borders the character area to the east and the area is crossed by a number of further</p>	<p>The Site is adjacent to the A1(M) and would retain all existing screening alongside the road. The proposed planting along the eastern boundary of the Site would</p>	<p>✓ (long-term)</p>		

<p>busy roads. The railway also cuts through the character area. The area is vulnerable to further degradation from the removal of any existing screening.</p>	<p>provide long-term benefits in enhancing screening of the A1(M) from locations around Great Wymondley.</p>			
<p>There is generally limited public access through rights of way. However it does include sections of the Icknield Way, the Hertfordshire Way and Letchworth Garden City Greenway.</p>	<p>The Site is not crossed by any public rights of way, and therefore retains all existing public rights of way.</p> <p>The proposed development incorporates permissive paths that will improve public access to the landscape for the lifetime of the development. I consider this to be a significant benefit in terms of providing access to the countryside for local people.</p>	<p>✓</p>		

8.2.6 In considering each of the landscape sensitivities for the LCA in turn, it is clear the proposed development would not adversely affect any sensitive characteristics of the landscape, but would provide benefits in relation to recreational access during operation, and long-term benefits post-decommissioning. The benefits are recognised by NHDC in their Committee Report that *‘the proposed mitigation would be beneficial to the landscape and biodiversity’* (paragraph 4.5.130, CD 35a).

8.2.7 The proposed development therefore respects all landscape sensitivities in accordance with point a) of Policy NE2.

8.2.8 The following visual sensitivities are identified for the LCA:

Visual Sensitivity	Response	Proposed Development:		
		Supports	Neutral	Conflicts
<p>Views of the countryside from the settlements are an important feature.</p>	<p>The Applicant’s LVIA (CD4) confirms the proposed development would not visibly detract from views from settlements. The closest settlements are Great Wymondley, Little Wymondley, and Graveley.</p> <p>Visibility from Great Wymondley would be limited to the western end of Graveley Lane, with reference to Viewpoint 4 of the LVIA.</p>		<p>✓</p>	



	<p>There would be no intervisibility with Little Wymondley due to the intervening railway line.</p> <p>There would be no intervisibility with Graveley due to the intervening A1(M).</p>			
<p>The small woodland copses and hedgerows to the south maintain the more enclosed historic character of the area.</p>	<p>The Site is separate from any conservation areas, scheduled monuments or listed buildings.</p> <p>Areas of woodland and hedgerow that enclose areas of historic character would not be affected by the proposed development.</p>		✓	
<p>Expansive views from higher ground create a sense of space and openness. However the views are not always high quality.</p>	<p>From the eastern edge of the Site at the Hertfordshire Way there are expansive views across the landscape from higher ground. These views are from adjacent to the A1(M) and therefore it is not a natural stopping point or viewpoint in the landscape.</p> <p>The LVIA (CD4) assesses the view as Viewpoint 1, and reports that in the short-term there would be a moderate to major adverse effect, but that this would reduce in the long-term to minor to moderate adverse.</p> <p>The proposed development respects this visual sensitivity of the area through the design measures taken by the applicant to both set back the solar development from the footpath by 50m, and to provide screening in the form of a hedgerow. As demonstrated by the photomontages on CD74 to CD77, whilst the hedgerow would limit views of the distant hills, they would still be apparent, and views would remain expansive.</p>		✓	
<p>Existing urban edges are often raw, with scope for mitigation through screening with treebelts.</p>	<p>The Site would not increase screening of any existing urban edges, but would enhance screening of the A1(M) which would be a long-term benefit. The proposed development includes planting around its boundaries to avoid introducing any further raw development edges.</p>		✓	

8.2.9 In considering each of the above visual sensitivities for the LCA in turn, it is clear the proposed development has taken a design approach to minimise adverse impacts,



and would provide long-term benefits in respect of the enhanced landscape screening at decommissioning.

- 8.2.10 The proposed development therefore respects all visual sensitivities in accordance with point a) of Policy NE2.

a) Respect the sensitivities of the relevant landscape character area and have regard to the guidelines identified for built development and landscape management

- 8.2.11 Turning now to the landscape management and built development guidelines for the LCA, I will address how the proposed development has had regard to each in turn.

Landscape & Built Development Management Guideline	Response	Proposed Development:		
		Supports	Neutral	Conflicts
Promote management of ancient woodland to encourage a diverse woodland flora.	The Site does not include ancient woodland and therefore this management guideline is not relevant.		✓	
Promote the creation of buffer zones between intensive arable production and areas of semi-natural habitat and the creation of links between habitat areas.	The proposed development incorporates minimum 12m buffer zones to existing habitats, and proposes new habitat links between areas.	✓		
Promote hedgerow restoration along the lines of historic field boundaries and for the creation of visual links between existing woodland areas.	The proposed development incorporates a substantial amount of new hedgerow planting to restore field boundaries where hedgerows have been lost, and to gap up fragmented hedgerows.	✓		
Promote the use of traditional field hedges in place of post and wire enclosures to new grazing areas.	The proposed development incorporates hedgerows or other planting around all boundaries to ensure that the proposed post and wire fencing is screened from views. This would restore a number of fragmented hedgerows where otherwise the presence of hedgerow is declining.		✓	
Protect and preserve the pattern of narrow winding lanes and associated hedgerow	The proposed access points to the Site are not along part of a narrow winding lane, and therefore this guideline is not relevant.		✓	

banks, sunken lanes, verges and hedges.				
Promote the diversity of hedgerow species and the planting of standard hedgerow trees.	The proposed hedgerows include a diverse native species mix, and include species that will establish as hedgerow trees. Hedgerow restoration work will follow the same principles.	✓		
Encourage and develop the diversity of tree planting along the River Ivel.	Not applicable to the Site		✓	
In the south encourage the development of species-rich calcareous grassland habitats.	The soils across the Site are predominantly clay or clay loam, and therefore the establishment of calcareous grassland habitats is not applicable here. Grassland habitats are proposed across the Site including species-rich grasslands.		✓	
Encourage woodland planting, in small copses, around the fringes of sub-urban settlements.	The Site does not adjoin a sub-urban settlement and therefore this guideline is not relevant. The proposed development does include woodland belts in small copses along the north side of Graveley Lane, and at the western boundary of the part of the Site north of Graveley Lane.		✓	
Encourage small blocks of woodland planting along the A1(M) corridor and especially around Junction 9.	The proposed development incorporates hedgerow and tree planting along its eastern boundary with the A1(M).		✓	
Manage areas of paddocks and promote appropriate enclosures with hedges rather than wire fences.	Not applicable to the Site.		✓	
Encourage the management of Oak and Hornbeam Coppice.	The proposed woodland mixes include Oak and Hornbeam that once established could in part be managed as coppice on rotation.	✓		
Conserve the traditional character of Great Wymondley and Graveley villages, ensuring that any new development located on the edge of the village uses appropriate vernacular materials and features to avoid inappropriate visual intrusion.	Great Wymondley is located approximately 300m away from the proposed development at the closest point. There is separation provided by the intervening fields, hedgerows and trees but there would be some visibility from the east side of the settlement at Graveley Lane (refer to Viewpoint 4 of the LVIA, CD4). This visibility is addressed through mitigation using the local vernacular field boundary treatment (hedgerow) to reduce and indeed largely eliminate visual intrusion.		✓	

	Graveley is separated from the Site by the A1(M) and there is no intervisibility.			
Encourage the retention of vegetation along infrastructure routes to ensure that it remains screened.	The proposed development would retain all existing vegetation alongside the A1(M) and Graveley Lane and proposes additional planting to enhance screening of the routes.	✓		
Encourage the planting of appropriate broadleaved woodland and vegetation to screen any new development that could intrude in panoramic rural views.	The proposed development incorporates substantial hedgerow and woodland belt planting around its boundaries to provide screening.	✓		
Avoid the location of new development in visual intrusive locations [sic].	The ZTV for the proposed development (CD73) demonstrates its very limited visibility. This was confirmed by fieldwork and the assessment undertaken for the LVIA that found visibility to be highly localised. The Site can therefore be considered not to be a visually intrusive location.	✓		
Ensure that new development does not necessitate the removal of existing woodland blocks or hedgerows.	The proposed development retains all existing woodland blocks and hedgerows.	✓		
Ensure that where appropriate, new development provides mitigation for itself and where possible existing intrusive features in the vicinity.	The proposed development incorporates substantial hedgerow and woodland belt planting around its boundaries to provide screening of itself, and in the long-term towards the A1(M).	✓		
Ensure that lighting associated with new development does not create additional urbanising influences on the character area.	The proposed development would not be permanently lit. Lighting would be motion-activated and only used at night in emergency situations.	✓		
Use the opportunity of any developments to create new accessible green infrastructure.	The proposed development includes permissive paths adjacent to Graveley Lane lined with hedgerows and species-rich grasslands to create a new accessible green infrastructure corridor.	✓		

8.2.12 It has been demonstrated that the proposed development has had regard to the guidelines identified for built development and landscape management, and is therefore in accordance with point a) of Policy NE2.

b) Do not cause unacceptable harm to the character and appearance of the surrounding area or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this

- 8.2.13 The LVIA submitted with the planning application determined that there would be a moderate to major landscape effect at the level of the Site, and a minor to moderate adverse effect over a localised area surrounding the Site.
- 8.2.14 The conclusion on visual effect was that there would be short-term moderate to major visual effect for receptors along the public right of way on the northern edge of the Site, and for people driving along a short stretch of Graveley Lane. In my opinion this level of short-term visual effect is typical of almost all development and especially so where footpaths are positioned directly around the boundary of a greenfield site. The medium- to long-term visual effects once the proposed planting has established are minor to moderate adverse around the Site boundary and minor to moderate adverse from a short section of footpath south of Great Wymondley. All other visual effects range from minor adverse to negligible. There would therefore be no significant residual adverse effects as a result of the proposed development in the medium- to long-term once the proposed mitigation is established.
- 8.2.15 It is my opinion that the level of effect resulting from the proposed development is highly localised to the area immediately around the Site. This is due to the characteristics of the Site and the receiving landscape, and the approach taken to mitigation. I note the Case Officer concluded the same in the Committee Report (paragraph 4.5.130, CD35a).
- 8.2.16 The limited zone of visibility for the proposed development is such that the development will be experienced as a short duration 'event' by those passing through the landscape. The lack of long-distance views means that there will be limited 'warning' of its presence. Once visible the proposed development would only be in sight for a short duration. This zone of visibility is also experienced in a part of the landscape where the A1(M) has a notable influence on the perception of tranquillity. Users of the local roads and the Hertfordshire Way in this area are not passing through pristine countryside; they pass through quite varied landscapes, and the location of the Site is not an area noted for special qualities or with specific attributes of high value. I consider it unlikely that a highly localised change in landscape

character and visual amenity of this type in this location would deter the use of local public rights of way or the Hertfordshire Way as a long-distance trail.

- 8.2.17 I conclude that the level of harm to the character and appearance of the surrounding area is acceptable, or that it is not 'unacceptable', and that the proposed development is therefore in accordance with point b) of Policy NE2.

c) Are designed and located to ensure the health and future retention of important landscape features

- 8.2.18 Neither the Policy nor the supporting text in the NHLP provide detail as to what qualifies as an important landscape feature. My professional opinion is that important landscape features would be unusual or unique elements that cannot be easily replaced or substituted. Such features could include ancient woodland, ancient and veteran trees, or landmarks. The Site includes no such features and therefore point c) of Policy NE2 is not applicable.

d) Have considered the long-term management and maintenance of any existing and proposed landscaping.

- 8.2.19 The proposed development includes a range of landscape treatments including grassland, hedgerows and woodlands. The Applicant has committed via agreement to a planning condition to provide details of long-term maintenance and management of all existing and proposed landscape elements. The proposed development therefore accords with point d) of Policy NE2.

Summary of Policy NE2

- 8.2.20 I have considered in turn the proposed development against each of the criterion of Policy NE2, including a detailed appraisal of the relevant sensitivities and management guidelines for the local landscape. I conclude that the proposed development is in accordance with all four criterion identified under Policy NE2.

8.3 National Planning Policy Framework

- 8.3.1 With reference to Chapter 15 of the NPPF, I consider the relevant paragraph in relation to landscape matters to be paragraph 174.

- 8.3.2 Paragraph 174 states that:



Planning policies and decisions should contribute to and enhance the natural and local environment by:

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

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

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

d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;

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

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

8.3.3 With regards to paragraph 174(a), there is no definition of what constitutes a valued landscape.

8.3.4 The matter has previously been considered in the High Court in the 2015 case of *Stroud v SSCLG* (CD142). The scope and definition of what constitutes a valued landscape was considered. Mr Justice Ouseley held that the NPPF is clear in distinguishing valued landscape from landscape which has a designation, and he considered that valued meant something other than popular, such that landscape was only valued if it had physical attributes which took it out of the ordinary.

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- 8.3.5 This largely reflects guidance in GLVIA3 (CD66) where in Box 5.1 a range of factors that contribute to the identification of valued landscape is set out. These factors include rarity; perceptual aspects such as tranquillity or wildness; recreational value and scenic quality. Where present and strongly enough expressed these are factors that might elevate a landscape above the 'ordinary'.
- 8.3.6 I do not consider the Site to be part of a valued landscape. The Site is not recognised as a valued or locally designated landscape in either the NHLP or the WNDP. The characteristics of the Site are such that it comprises ordinary elements and features that are not nationally or locally rare, and it has local detractors in the A1(M) and railway line to the south. The TLP Review (para 3.2.9, CD86) sets out that their professional opinion is that the Site is not part of a 'valued landscape'. The NHDC SoC confirms at paragraph 5.25 that their view is also that the Site does not form part of a 'valued landscape'.
- 8.3.7 With regards to paragraph 174(b) and its requirement to recognise the intrinsic character and beauty of the countryside, it is my opinion that NHLP Policy NE2 is fully in accordance with the requirements of paragraph 174(b) and that therefore the planning application can be determined as per Policy NE2.
- 8.3.8 Policy NE2 sets out the requirements for development to consider the specific landscape and visual sensitivities of the receiving landscape character area, which inherently involves recognising the intrinsic character and beauty of the countryside and different areas. Policy NE2 also requires development not to cause unacceptable harm to the character and appearance of an area, which also requires an inherent consideration of the intrinsic character and beauty of the countryside. The proposed development is compliant with Policy NE2 and therefore also compliant with paragraph 174(b) of the NPPF.

9.0 CONCLUSIONS

- 9.1.1 The Planning Application submitted in December 2021 was accompanied by a LVIA prepared in accordance with current best practice guidance.
- 9.1.2 Due to the relatively low height of the proposed development components, the presence of existing screening around the Site, and the influence of landform, the proposed development would be of limited visibility from the wider landscape.
- 9.1.3 The limited zone of visibility for the proposed development is such that the development will be experienced as a short duration 'event' by those passing through the landscape. The lack of long-distance views means that there will be limited 'warning' of its presence. Once visible the proposed development would only be in sight for a short duration. This zone of visibility is also experienced in a part of the landscape where the A1(M) has a notable influence on the perception of tranquillity.
- 9.1.4 The conclusion by both the Applicant and NHDC is that there would be no residual significant adverse landscape or visual effects, and that residual adverse landscape and visual effects would only be experienced in a very localised area to the Site.
- 9.1.5 In considering the effect of the proposed development on the openness of the green belt, I have concluded that the proposed development would materially harm the visual openness of the green belt in the short-term, but that the level of harm would reduce as planting establishes and screens the development. The development is temporary in nature albeit that this would be for a relatively long period of time (40 years). It is the case (accepted by the Council) that the measures introduced to protect existing landscape elements and introduce new ones should leave the landscape in a better condition after decommissioning than exists now.
- 9.1.6 NHDC assess the proposed development to be in conflict with NHLP Policy NE2, which seeks to avoid *unacceptable* harm to landscape character and appearance.
- 9.1.7 I have considered the proposed development against each of the criterion of Policy NE2, including a detailed appraisal of the relevant sensitivities and management guidelines for the local landscape. Whilst there may be localised adverse landscape and visual effects resulting from the proposed development, I consider the level of landscape and visual impact to be very modest and not equivalent to *unacceptable* harm. I therefore conclude that whilst there may be localised adverse landscape and

visual effects resulting from the proposed development, there would not be conflict with Policy NE2.

9.1.8 I have also considered the proposed development in relation to the NPPF have found the proposed development to be in accordance with Section 15 of the NPPF.

9.1.9 In recommending a grant of planning permission the Case Officer concluded that:

There is a circular argument for and against the proposal. The greater the renewable energy generation the greater the weight given to this as a material consideration, but with that comes the greater spatial and visual impacts. Notwithstanding the large scale of the proposal, the landscape impacts are relatively localised due to topography and existing landscaping, whereas the renewable energy generation would be substantial compared to existing renewable energy generation in North Hertfordshire.

9.1.10 I agree that the landscape and visual impacts of the proposed development are localised. In the NHDC SoC (CD138) the Council attaches moderate weight to the landscape and visual harm resulting from the proposed development (paragraph 5.24). In my opinion the weight given to landscape and visual harm should be no greater than moderate. I have found the proposed development to be compliant with Policy NE2 and, therefore, there is justification that the level of landscape and visual harm should in fact be lower than the Council have found.



