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## Appendix A: Screening Opinion

## **Delegated Report**

### **North Hertfordshire District Council**

#### **Screening Opinion in accordance with The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended)**

**In respect of Land to the North and East of Great Wymondley, Hertfordshire.**

**Proposed solar farm with associated battery storage containers, transformers  
stations, storage buildings, fencing etc including means of access**

This screening opinion relates to the above proposal and is based on information contained within application reference 21/02228/SO together with the supporting documents and information submitted on 21 July 2021.

This report confirms the view of the Local Planning Authority that the proposed development does not fall within Schedule 1 of the EIA Regulations and does not therefore require a mandatory Environmental Statement.

The proposed development falls within Schedule 2 which relates to Section 3(a) 'Industrial Installations for the Production of Electricity' on a site exceeding the threshold of half a hectare. The proposed development exceeds the thresholds by reason of proposing 85 hectares of land for the use of solar panels, although it is acknowledged that the proposal has been reduced in scale from 116 ha compared to plans subject of a previous pre-application submission.

This report appraises the characteristics of the site and the proposed development against the criteria in Schedule 3 of the Regulations and against the current Planning Practice Guidance and concludes that the proposed development is not likely to give rise to significant impacts and so would not require a formal Environmental Impact Assessment (EIA) and an Environmental Statement (ES) to accompany the planning application that has been submitted to the Local Planning Authority.

#### **1. Summary of the proposed development**

- 1.1 The proposed development is set out as the provision of a solar farm with associated ancillary development affecting 85 ha. The site is not designated within the Emerging Local Plan (ELP).
- 1.2 The proposed development would be located on land at the north and east of Great Wymondley with the A1 forming the far eastern boundary to the site. The site comprises a series of arable fields which consist of two blocks: one to the north and one to the south of Graveley Lane. Graveley Lane is the link road running east to west under the A1 between Great Wymondley and Graveley, all within North Hertfordshire District.

#### **2. Assessment against Schedule 1 and Schedule 2 of the Regulations**

- 2.1 The proposed development does not fall within any of the categories of development set out in Schedule 1 of the Regulations.

- 2.2 The proposed development falls within column 1 of Schedule 2 of the Regulations being categorised as being within section 3(a) which relates to 'Industrial Installations for the Production of Electricity'.
- 2.3 The development exceeds the site area limit of 0.5 hectares in column 2 of Schedule 2 (3(a)) of the EIA Regulations 2017.
- 2.4 The site is not within a 'sensitive area' as defined under Regulation 2 of the EIA regulations, although there is a Scheduled Monument close by at Wymondley Priory etc, listed building number 1013338. The regulations require further assessment where there is a Scheduled Monument within the site and not simply nearby.
- 2.5 Based on the above, the proposed development represents Schedule 2 development, however this does not automatically mean that the proposal is EIA development. In accordance with the Regulations, a screening exercise must be carried out in order to determine whether an EIA is required, considering the proposals against the selection criteria identified in Schedule 3 of the Regulations.
- 2.6 Regulation 5(4) of the EIA Regulations 2017 outlines that the Local Planning authority must take account the selection criteria set out under Schedule 3 of the regulations when determining whether a Schedule 2 development is an EIA development.

### **3. Consultation Responses**

- 3.1 *Hertfordshire Highways* – Noting the context of the site and type of proposed development, a Transport Statement would be required to demonstrate the suitability of access points from Graveley Lane. A Construction Traffic Management Plan (CTMP) is also required to support any planning applications. Detailed advice is contained in the attached note from the highway authority. It is also noted that no glint and glare assessment has been included and should be prepared to support any planning application in the context of highway safety. A Section 278 agreement will be required for any new or altered access points.
- 3.2 *Lead Local Flood Authority* – Confirmation that both a FRA and SWDS is required to support any future applications. The expectation given the current greenfield use of the site is that drainage and surface water can be managed in a sustainable manner. Drainage works may also require drainage consent from HCC as LLFA. The proposed use of the site introduced impermeable surfaces meaning that run off needs to be actively managed. See attached letter for full detail
- 3.3 *Historic England* – Noted the site's proximity to several designated and non-designated heritage assets including two Scheduled Monuments and Grade I, II\* and II Listed Buildings. A heritage statement, in accordance with the NPPF and 'Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets', will be required to support any application. The scope of this document should be agreed in consultation with Hertfordshire Archaeological team. There should be heritage consideration in the viewpoints adopted for the landscape and visual impact assessment (LVIA). See attached letter for full detail.
- 3.4 *Stevenage Borough Council* – No comments.

- 3.5 *Wymondley Parish Council* – No comment.
- 3.6 *Hertfordshire Minerals and Waste* – Not yet received.
- 3.7 *Archaeology* – Not yet received.
- 3.8 *Hertfordshire Public Health* – Not yet received.
- 3.9 *Environmental Health* – Not yet received.

#### **4. Selection Criteria for Screening Schedule 2 Development**

##### Site location and context

- 4.1 The site lies within the Green Belt as allocated by the Saved Local Plan and would remain as such in the ELP. The site is entirely within Flood Zone 1, as identified by the Environment Agency. The site is not susceptible to Surface Water Flooding, as identified at gov.uk 'Flood Map for Planning'. No part of the site is within an Archaeological Area of significance. There are no further site designations within the site itself.
- 4.2 The site is framed on the eastern boundary by the A1 and large arable fields around to the north, west and south. More than half of the land is classified as Grade 2 agricultural land, the remainder being Grade 3, which is not defined yet between Grades 3a and 3b.
- 4.3 The site is close to Great Wymondley and the site is highly visible on both sides of Graveley Lane and from the A1. There are sporadic hedgerows and trees along field boundaries and the line of electricity pylons running between Hitchin and Stevenage are also highly visible in the context of the site. The site sits at a similar or slightly lower level compared to the A1, however the land slopes down away from the motorway and there are long wide views from the A1 towards Wymondley and Hitchin beyond.
- 4.4 There are no designated heritage assets within the site. However, there is a scheduled monument at Wymondley Priory with associated listed buildings approx. 300m to the west of the southern part of the site and its associated expressly scheduled 'conduit' about 60m to the site boundary. Wymondley Caste is also about 300m to the west of the northern part of the applications site. There are many statutory listed buildings beyond centred on Great Wymondley.
- 4.5 The site will only be accessed from Graveley Road, equally by 50% of the development on both the northern and southern sides of the road, with no other road frontages. Graveley Lane is accessed either through other local distributor roads through Great Wymondley or from a B-road through Graveley, with overall close proximity to the strategic highway network. There is a Public Right of Way (Bridleway) running adjacent to one boundary of the site.

##### Characteristics of the development

- 4.6 Schedule 3 states that this should have regard to the following:
  - a) *The size and design of the whole development.*

4.7 The size of the proposed solar farm at 85 ha may be considered significant, however it is considered reasonable given the scale of arable fields and appropriate in the context of the A1 corridor and abundance of countryside around the application site. The scale of solar farms can vary significantly and is assessed in the context of the area. The scale of the proposal has also been reduced so as to limit immediate impact on heritage assets. The development would be limited in terms of built form, massing and height by virtue of the type of proposals, although acknowledging that it does change the character of the land. The design is utilitarian, and the layout of the structures are uniform and presumably designed to be as efficient as possible.

*b) Cumulation with other development.*

4.8 There is one small existing solar farm site in North Hertfordshire District near Luton. The Council has received is one other pre-application enquiry regarding a solar farm which would also connect to the Wymondley substation, and a screening opinion for another site in the rural area/outside of the Green Belt. There are no site allocations for solar farms in the saved or emerging Local Plans. This proposal would not increase cumulation of development or result in an over concentration of this use.

*c) Use of natural resources*

4.9 The use of the land for a solar farm would not alter natural resources on site significantly. The contribution of solar energy to reducing the need or reliance on natural resources is positive.

*d) The production of waste*

4.10 Construction waste is an inevitability with any development project although the scope of waste from a solar farm would be limited given the existing use of the site and proposed scope of built form to be introduced. Waste production is not expected to be significant, and the carbon reductions sufficiently offset against the benefit of renewable energy production. A Site Waste Management Plan could be secured by condition and/or legal agreement. A CTMP should be submitted to manage waste in the context of construction traffic.

*e) Pollution and Nuisances*

4.11 The principal consideration in regard to noise and vibration resultant from the proposed solar farm is increased traffic movements, primarily through the construction phase and then any ongoing noise from the proposed equipment. The environmental impact of noise and vibration from construction traffic will be temporary, and it is expected to be able to be managed satisfactorily through a construction traffic management plan secured by condition and/or legal agreement. Solar farms are not considered to result in undue noise levels in the normal daily running of the site.

4.12 Considering the existing siting of the development and key junctions, the proposed development is not likely to have a significant impact in respect to increased traffic and resultant noise and emissions. Increased traffic movements are acknowledged, however, the environmental impacts resultant from that increase will not be significant in the context of the area. The Highway Authority have recommended suitable technical work is submitted to support the application, noting the scale and location of the proposed development. New access points are required to the site on both sides of Graveley Lane, which will need to meet

highway standards, but there is no objection in principle to the proposals and its impacts from a highway perspective in this context.

- 4.13 In light of the planning practice guidance that only a very small proportion of Schedule 2 development would require an Environmental Impact Assessment, and that such assessments should not be used as a barrier to growth, it is concluded that the potential short and long term pollution and noise nuisances would not have a significant environmental impact.

*f) The risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge*

- 4.14 Natural disaster events are not considered relevant to the type of proposed development. There is no likelihood of significant additional traffic which could cause major accidents as a result of a likely decrease in employment as a result of the proposed development and increased automation. The introduction of renewable energy will assist in the reduction of carbon emissions and resulting impact on climate change.

*g) The risks to human health (for example, due to water contamination or air pollution)*

- 4.15 None expected.

Location of development (having regard to environmental sensitivity of the area to be affected)

- 4.16 Schedule 3 states that the environmental sensitivity of geographical areas likely to be affected by development must be considered having regard in particular to:

*a) the existing land use*

- 4.17 The existing site comprises large arable fields. The site is divided in two with Graveley lane with a series of hedgerows and sporadic trees. Much of this layout would be retained. As such, the existing land use is not considered sensitive to the proposed use, as it is not of any significant environmental value.

- 4.18 The existing agricultural land is graded part Grade 2, part Grade 3. This needs to be defined further, however in principle the Best and Most Versatile (BMV) land should be protected. Given that slightly less than half the land would potentially BMV, which has yet to be further defined, this is not considered alone to be sufficient to require an ES.

*b) abundance/quality/regenerative capacity of natural resources in the area*

- 4.19 The development would not likely have a significant impact on immediate/ onsite/ nearby natural resources. The proposed development would not have a negative environmental impact in respect to pollutive discharge, or impact on ecology.

*c) absorption capacity of the natural environment*

- 4.20 The site and surrounding land are not designated as significant natural environments (such as wetlands or mountain or forest area) that could be adversely affected. Due to the nature of the proposed development, there will still be potential for biodiversity to thrive, which should also be compared to the existing baseline scenario. It is also noted that although 40 years is a

substantial period of time, it is temporary and the land will revert back to agricultural use when the period ends.

#### Characteristics of the potential impact

4.21 The likely significant effects of the development on the environment must be considered in relation to criteria set out in paragraphs 1 and 2 above, with regard to the impact of the development on the factors specified in regulation 4(2), taking into account—

*(a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected)*

4.22 The size of the population likely to be affected, to a less than significant degree, as a result of the environmental issues identified above is not substantial. Any impact will be isolated to those neighbours immediately adjacent to the site which are limited by virtue of the rural character of the area. The impact on heritage assets is likely to be locally specific to those identified above, although views of the site in the context of heritage assets also needs to be considered. The impact on landscape would likely stretch further afield but limited to the areas between Hitchin, Letchworth and north Stevenage and potentially the eastern end of the Chilterns AONB but requiring appropriate assessment.

*(b) the nature of the impact*

4.23 The nature of the impact is limited primarily, in this case, to within the site and on immediately adjacent to it with particular impact to the visual impact of the development on the landscape and impact on the setting of heritage assets. On traffic movements, the impacts of increased traffic movements will be dissipated beyond discernibility and can be managed through appropriate assessments recommended by the Highway Authority.

*(c) The transboundary nature of the impact*

4.24 Whilst the site is not a substantial distance from the local boundary with Stevenage Borough Council, the less than significant environmental impacts would not reach or cross this boundary. Officers at Stevenage Borough Council did not wish to provide any comments on this application when consulted.

*(d) The intensity and complexity of the impact*

4.25 The impacts of the proposed development on the environment, as discussed above, are not considered intense. There is limited complexity added by increases to traffic movements primarily during the construction phase of development. There also needs to be careful consideration given to the impact of the proposals on landscape and visual amenity, as well as the impact on designated and non-designated heritage assets. However, these complexities are not beyond normal procedures when considering a planning application and would not reasonably require an ES.

*(e) The probability of the impact*

4.26 The impacts identified above are highly probable. It is unlikely that noise, vibration and emissions from traffic will not have some impact on the environment. Notwithstanding this, the impact would not be significant. Less than significant environmental impacts on heritage assets

and landscape would also be considered probable, however this can be reasonably assessed during the course of any future planning application.

*(f) The expected onset, duration, frequency and reversibility of the impact*

- 4.27 The environmental impacts from construction, including traffic, emissions and waste production will be early in onset, but relatively short in duration. The less than significant environmental impacts from traffic generation as a result of the use of the site would not be immediate or substantial.
- 4.28 The life expectancy of a solar farm is also up to 40 years, after which time the impact could be reversed.

*(g) The cumulation of the impact with the impact of other existing and/or approved development*

- 4.29 The potential cumulative impacts of the proposed site together with other solar farms is limited, with just one other proposed in this area at the time of writing. Future proposals would be considered in their context at that time. No likely significant impact has been identified within paragraphs 1 or 2 of Schedule 3 of the EIA Regulations 2017 (as above).

*(h) The possibility of effectively reducing the impact*

- 4.30 Planning conditions and/or legal agreements could effectively mitigate against some potential less than significant environmental impact in respect to construction, increased traffic and other environmental impacts.

## **5. Conclusion**

- 5.1 The Local Planning Authority recognises that the EIA Planning Practice Guidance states that only a very small proportion of Schedule 2 development will require an assessment. The Planning Practice Guidance states that the exclusive thresholds offer only a broad indication of the scale of development, which is likely to be a candidate for EIA, but that the requirements need to be considered on a case-by-case basis. In this case, the proposed development would not be of a scale or a nature to justify the need for an EIA or ES.
- 5.2 In view of the above analysis and in accordance with the requirements of the Regulations and guidance in the Planning Practice Guidance it is considered that any environmental effects that are likely as a result of the proposed development can be adequately addressed by specific studies and reports which can accompany any future applications and an Environmental Impact assessment is not required in this instance. Accordingly, the Local Planning Authority issues a 'Negative Opinion'.



**NORTH HERTFORDSHIRE DISTRICT COUNCIL**

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7 September 2021

Mr Phil Roden

Our Ref: 21/02228/SO

Contact: Sarah Kasparian

Direct Line: 01462 474251

Email: Sarah.Kasparian@north-herts.gov.uk

Dear Mr Roden,

**Screening Opinion: Proposed Solar Farm with Associated Battery Storage containers, transformer stations, storage buildings, fencing etc including means of access  
Land to the north and east of Great Wymondley, Hertfordshire**

This screening opinion represents the opinion of North Hertfordshire District as to whether the above development, as described in the particulars accompanying application reference 21/02228/SO, is EIA development within the meaning of the Regulations.

The development proposed falls within the description at Section 3(a) of Schedule 2 of the 2017 Regulations (as amended) and it exceeds the thresholds in column 2 of the table in Schedule 2 to those regulations (the development is for Industrial Installations for the Production of Electricity and exceeds the threshold of 0.5 hectares).

In the Council's opinion, having taken into account the criteria in Schedule 3 to the Regulations, the development would not be likely to have significant effects on the environment by virtue of factors such as its nature, size or location.

In considering the relevant matters, it is the Council's opinion that the proposed development is not 'EIA development' within the meaning of the 2017 Regulations (as amended).

This view on the likelihood of the development having significant environmental effects is reached only for the purpose of a screening opinion pursuant to the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Ellis', written in a cursive style.

Simon Ellis  
Development & Conservation Manager