Proposed Photovoltaic Solar Array on Land at Priory Farm to the east of Great Wymondley Hertfordshire

## LANDSCAPE AND VISUAL REVIEW

for

North Hertfordshire Distrct Council

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Appendix 1 – Mark up of LVIA Figure 1 indicating locations for omission of solar panels

# 1 Introduction

## 1.1 Scope of the review

1.1.1 This review has been prepared by The Landscape Partnership (TLP) on behalf of North Hertfordshire District Council (NHDC) in relation to full planning application 21/03380/FP. The proposed development is located on land at Priory Farm, Great Wymondley, Hertfordshire on land east of the settlement of Great Wymondley and west of the A1(M) as shown on the Planning Application Dwg No. 3004-01-002 NP 12043 Statutory Plan by Axis (hereafter referred to as the 'Site'). The proposed development is an application by AGR 4 Solar Limited (as subsidiary of AGR Power Limited) for:

Proposed solar farm measuring 88 hectares with associated battery storage containers, transformers stations, storage buildings, fencing etc including means of access. Land to the north and east of Great Wymondley Hertfordshire.

- 1.1.2 The application covers 88ha of agricultural land in a rural location comprising. The main part of the site extends c 1.4km from north to south and c 970m from west to east.
- 1.1.3 The purpose of this report is to review the relevant submitted planning application plans and documents, in particular the Landscape and Visual Impact Assessment, and the landscape and visual considerations in relation to the proposed development and:
  - the suitability of the approach, methodology and baseline
  - the likely effects of the proposed development on existing landscape features, landscape character and views;
  - the suitability of the proposed development in the context of its location;
  - · the level of detail and information provided about landscape and visual matters; and
  - any additional information required and recommendations.
- 1.1.4 In making these judgements, reference is made to the information submitted as part of the planning application, in which we have reviewed:
  - whether there is any missing information or additional information that is required in order to effectively assess the application;
  - the accuracy of the information provided, and methodology applied in the assessment process, particularly in relation to current guidance and best practice;
  - whether there is agreement or not on the assessed effects of the proposed development, based on a professional judgement by TLP, utilising the submitted information and an assessment on site; and
  - advising on any changes that should be made to improve the scheme.
- 1.1.5 In undertaking the review, we have considered the following submitted materials:
  - Landscape & Visual Impact Assessment (LVIA) prepared by Axis November 2021;
  - Proposed Development and Landscape Proposals (Fig 1) by Axis November 2021;

- General Arrangement Dwg No. 3004-01-003 Rev B by Axis;
- Planning and Design and Access Statement prepared by Axis November 2021;
- Screening Opinion by NHDC
- Pre-application response from NHDC in response to App 21/01269/PRE:
- 1.1.6 This review of the LVIA has been undertaken in line with guidance set out by the Landscape Institute (LI) in the Technical Guidance Note (TGN) 1/20 'Reviewing Landscape and Visual Impact Assessments (LVIAs) and Landscape and Visual Appraisals (LVAs)'.
- 1.1.7 The review has been undertaken by Jonathan Billingsley (CMLI), who has over 30 years professional experience including undertaking and reviewing LVIAs and is considered to be a 'competent expert' with 'sufficient expertise' as required by TGN 1/20 (page 2).
- 1.1.8 A site visit was carried out by Jonathan Billingsley on 28<sup>th</sup> April 2022 to view the site and local area to determine the likely effects on the landscape and views. Visibility was clear.

### 1.2 **Pre-Application consultation**

- 1.2.1 The applicant undertook a pre-application consultation with NHDC, and a formal pre-application response was provided to the applicant's agents Axis PED Ltd by NHDC on 28<sup>th</sup> May 2021 under App 21/01269/PREM.
- 1.2.2 The HNDC response noted that the majority of the Site was in Green Belt and that the proposals would constitute inappropriate development in the Green Belt. Inappropriate development should only be approved in very special circumstances (VSC) and where these clearly outweigh the harm to Green Belt including its openness and any other harm, which includes landscape and visual harm.
- 1.2.3 The NHDC Green Belt Review which forms part of the evidence base indicates that the Site is located in two parcels of Green Belt (10a and 14a) that make a significant contribution to Green Belt purposes including maintaining the separation of major towns (in this case Stevenage, Hitchin and Letchworth). The HNDC letter stated the effects on openness and purposes would give rise to significant harm to Green Belt to which substantial weight should be given.
- 1.2.4 The response went on to state in relation to landscape and visual impact (in addition to Green Belt effects),

The application site is set within a landscape of undulating form and character and is generally on higher ground that much of the surrounding landscape. There are many public vantage points (both at close quarters and in distant views) from which the solar farm will be experienced. It is likely that the development will have a substantive visual and landscape impact across a wide area that will need to be fully assessed. This would need to include agreement of appropriate viewpoints with the Council. In addition to the immediate surrounds of the site it would be necessary to include (but not necessarily limited to) views / impacts from within the Chilterns Area of Outstanding Natural Beauty (AONB) which affords open views from various vantage points eastwards across Hitchin towards Stevenage and the proposed solar farm site.

The proposed site lies within an area designated as Landscape Character Area (LCA)

Arlesey – Great Wymondley (Area 216 of the North Hertfordshire). The site would be located in the southern part of the LCA which is acknowledged as containing historic enclosed rolling arable

landscape. The LCA advises that the south of the character area would be vulnerable to loss of its historic character.

1.2.5 The LVIA at Appendix 2 (para 3.1.4-3.1.7) sets out further consultation with NHDC (but without any correspondence evidence) relating to the selection of viewpoints for the LVIA. In TLPs opinion following their site visit on 28<sup>th</sup> April 2022 the selected viewpoints are generally suitable. Two further locations were identified to the west and south of the Site as set out below.

### 1.3 Competency

1.3.1 The LVIA advises (para 1.2) that the assessment has been undertaken by a CMLI with over 8 years of professional experience including undertaking LVIAs and directed and reviewed by a second CMLI with over 25 years' experience. In combination this could be considered as a 'competent member' with 'sufficient expertise' in line with the requirements of TGN 01/20. However the names of the CMLI are not provided and should ideally be given.

# 2 Methodology

2.1.1 This section reviews the methodology, scope and process used in the assessment and how these relate to the guidance provided in GLVIA3 with respect to standalone assessments that are submitted to accompany planning applications. GLVIA3 refers to non-EIA projects as 'appraisals' rather than LVIAs (GLVIA para 1.11). This application refers to the study as an LVIA even though it is not EIA development (as confirmed by the Screening Opinion Letter from NHDC of 7/9/2021). However, this is a minor issue, and the process is essentially is the same and therefore the term LVIA will be retained throughout this review for consistency.

### 2.2 Study Area

- 2.2.1 The study area is described in section 3.3 of the LVIA and how this was initially refined through two stages of ZTVs (Figures 2 and 3) to reach a study area as set out at Figures 4-8 that extends c 1.6km to the east of the Site, 2.5km to the south, 4.5km to the south-west, 9km to the west and 0.6km to the north.
- 2.2.2 TLPs site visit confirms that the influence of the proposed solar park from a landscape and visual perspective is covered by the extent of the study area identified at Figures 4-8. All 16 of the Representative Viewpoints included in the LVIA are located within the study area described above.

### 2.3 Methodology

- 2.3.1 Appendices 1 and 2 of the LVIA sets out the methodology used in the LVIA assessment advising that it has been undertaken in accordance with a number of the best practice guidelines, including the Guidelines for Landscape Visual Impact Assessment, 3<sup>rd</sup> Edition (GLVIA3) and Landscape Institute Technical Guidance Note 06/19 (for visualizations). Aspects of the methodology are also covered in Section 3 of the main LVIA. It is not clear if the methodology was submitted to NHDC in advance of the LVIA being carried out. Whilst this process is recommended, it is not a requirement, and is more typically undertaken in relation to Environmental Impact Assessments (EIAs).
- 2.3.2 The LVIA provides a separate assessment of sensitivity, magnitude and significance of effect of landscape and visual receptors, providing thresholds and explanations, in accordance with GLVIA3. The methodology appropriately differentiates between effects on landscape elements, landscape

character and visual receptors and there is a clear separation of the assessment of landscape and visual effects. A range of tables including indicative criteria / descriptors are used for attributing value, susceptibility and sensitivity for the respective landscape and visual receptors and the levels of magnitude of change experienced and how these are combined to the significance of effects. In relation to one point of detail TLP do not accept the definition in Table 2.2 that states that for a 'large' magnitude of change it needs to be irreversible.

- 2.3.3 In TLPs opinion the Methodology as set out in Appendix 1 is clear and sufficient. At a number of points reliance on professional judgement is stressed in the application of the definitions/criteria etc. This follows GLVIA3. The transparency of the application of professional judgment is provided evidenced in the assessment stage of the LVIA (in this LVIA Sections 5, 7 and Appendices 3 and 4). It is noted that the Methodology uses indicative figures (Methodology Figure 4.1) as a guide to show how levels of effect are reached. It should also be noted that different practitioners professional judgement may result in differing conclusions about the levels of effect that may arise from the same proposals.
- 2.3.4 The Methodology provides commentary (para 4.14.8) about how EIA is focused on identifying significant effects. It is noted in the main text (para 3.4.2) that as this is not an EIA development and that there is no requirement to state if effects are significant. However, the identification of significant effects has been included in the LVIA to assist the decision maker to establish the more important effects. TLP are content that this approach has been used for the LVIA.
- 2.3.5 The LVIA also states (3.4.3) that for this study effects 'above moderate' are considered to be more likely to be significant. TLP consider this to be a reasonable approach.
- 2.3.6 Appendix 2 provides the Methodology used for the use of ZTVs and the identification of the representative Viewpoints. His seems reasonable and appropriate.
- 2.3.7 Section 4 of Appendix 2 sets out the process used in the production of Photographs and visualizations. This appears to have followed LI TGN 06/19. The only aspect that is not ideal is the reliance on summer photography (September 2021) which does not reflect a worse case situation. At TLPs site visit in late April 2022, hedges were largely in leaf and trees partly in leaf. TLP identified a few locations not assessed in the LVIA where there would be some additional visibility in the winter months e.g. from the Great Wymondley Recreation Ground.
- 2.3.8 TLP also note that the use of photographs/photomontages by way of a cylindrical projection split across two A1 sheets is impractical to reproduce use in the field. However, this is essentially a criticism of the LITGN rather than the LVIA.

# 3 Baseline

3.1.1 This section of the report considers the baseline description.

## 3.2 Baseline Description

3.2.1 Section 4 in the LVIA provides a description of the baseline conditions of the site and the surrounding area. Figures 1-8 illustrate landscape character areas, ZTVs and viewpoints. Figure 1 provides the site proposals. However, there is no detailed drawing or analysis of the Site (c. 1:50,000 scale), including topography, showing the immediate surroundings prior to the development.

- 3.2.2 The baseline description from para 4.2 describes the areas of the Site and the main features including: topography, existing vegetation, land use, roads and rights of way. The Site description does not include the route of the cable connection or the two linear strips of mitigation planting to the east of the main part of the Site (as shown on the Statutory Plan Drawing 3004-01-002). The description is reasonable. The only caveat is that the closest residential properties also include Miklsey Cottages to the west on the edge of Great Wymondley at the junction of Graveley Lane and Priory Lane. Furthermore the sense of enclosure is variable from major and local roads and rights of way with some open aspects into the Site.
- 3.2.3 In terms of designations the Site is not designated for any landscape reason and the Chilterns AONB is c 5.3km to the west. It would have been helpful to state the relevance of the AONB and related policy and to show the AONB boundary on one of the figures to illustrate this in relation to potential effects on the setting of the AONB and inclusion of Viewpoint 16. The Site is fully within Green Belt which is confirmed in the LVIA and discussed at Section 8 (in addition to the Planning Statement). TLP comment on this aspect later.
- 3.2.4 In relation to Landscaper Character assessments the LVIA sets out the relevant National Character Area (NCA 87 East Anglian Chalk and Figure 5) and Regional Character Area (RLCT 13 Lowland Village Farmlands and Figure 6). Pertinent aspects are mentioned in the LVIA from the NCA and RLCA. However, the LVIA does not consider the NCA and RLCT units beyond the baseline section.
- 3.2.5 The LVIA then considers in more detail relevant extracts from the County/District LCA where the Site is located within LCA 216 Arlesey/Great Wymondley (also at Figure 7). The LVIA lists the key characteristics for the LVIA. In relation to distinctive features the LVIA does not mention the presence of the historic settlement of Great Wymondley which to the west. Reference is made at two sections (4.3.12 and 4.3.14) to prominent urban fringes. However, TLPs assessment following the site visit is that in this part of the LCA there is a very limited influence of urban edges around the Site and where present these are from smaller villages rather than urban areas. On this basis the identification of the LCA (overall) as having a low landscape sensitivity, due to the significant urban influence and numerous detractors is less applicable to the Site and its local area (a scale that is not separately assessed in the LVIA). In TLPs opinion the main detractor of the area is the A1(M). However, in other respects the local area has few detractors and at a local scale TLP consider the sensitivity to be Medium rather than Low.
- 3.2.6 The LVIA provides a list of relevant inherent sensitivities (from those on page 108 of the LCA). While the quoted sensitivities are all relevant to the LCA as a whole some are less relevant to the Site and its local context. In TLPs opinion there is a limited influence of urban areas and electricity pylons. Also the presence of the Hertfordshire Way as one of the limited public rights of way through the LCA is not mentioned in the LVIA even though it follows the norther boundary of the Site.
- 3.2.7 The LVIA also quotes the list of visual sensitivities in for LCA 216 and that the Overall visual sensitivity is Low to Moderate. However, as described above this is an overall assessment for the LCA which includes e.g. 'existing urban edges are often raw'. However, this description does not apply to the Site and its local context.
- 3.2.8 Although the Site is located entirely within LCA 216 it is noted that adjacent LCAs are not mentioned to the east and south which would have been helpful for context and where there are also views towards the Site.

- 3.2.9 In terms of landscape value the LCA 216 says this is low landscape value overall, with the reasoning being summarised as 'the large number of roads and transport routes and the presence of significant settlements to the fringes.' In TLPs opinion while this may be the assessment overall it does not reflect the value at a more local and Site based scale which in TLPs opinion should be Medium based on the definitions at Table 2.1 of the methodology. The main detractor in the locality is the A1(M) corridor) and traffic. However, the rest of the Site is reasonably attractive if ordinary large scale arable landscape. For clarity TLP consider the Application Site does not fall within the definition of a 'valued landscape' for the purposes of paragraph 174a of the NPPF.
- 3.2.10 The LVIA then refers to landscape capacity (4.3.20). The range of capacity variers from low to medium for the categories mentioned. While solar farms are not specifically listed in the types of development (as stated by the LVIA) TLP consider that the best fit to those types of land use listed is 'Large scale open uses' since a solar farm covers a large area, is relatively uniform and is not very tall (c up to 3m height). NB the methodology for the LCA (Page 17c) provides an example of car storage in this category. For this category the LCA states for LCA 216 'this would not be in keeping with the rural character of the area and likely to be very open to view and introduce new elements that would conflict with existing characteristics. The landscape capacity for large scale 'open' uses is considered to be low.' In TLPs opinion the capacity should also reflect the scope for mitigation that can be provide for a specific proposal.
- 3.2.11 The LVIA then provides (4.3.21) a list of relevant guidelines for managing change from the lists for both landscape management and built development. TLP agree with the relevance of those guidelines provided. TLP consider the following guidelines are also of potential relevance: Maintain and extend the rights of way network, Encourage small blocks of woodland planting along the A1(M) corridor, Protect and preserve the pattern of narrow winding lanes and associated hedge banks, sunken lanes, verges and hedges (this would apply to Gravely Lane and Priory Lane), use the opportunity of new developments to create new accessible green infrastructure.
- 3.2.12 The summary for the landscape character studies (paras 4.3.22-23) referring the published studies. The LVIA does not provide a more localised /Site based assessment of the relevant parts and local variations. The LVIA relied on of the summary at the larger and principally district scale. While this is correct and appropriate TLP consider that reference to a more local /Site scale is also helpful particular where the judgements in the LCA 'overall' are not an ideal fit with the character of the local area. This is reflected in the summary wording in the LVIA in relation to landscape character which says, 'the landscape is identified as large scale, open, arable landscape (TLP agrees) with prominent urban fringes to towns (TLP disagree in respect of the Site) and with major transport infrastructure (TLP agree in relation to A1(M) and pylons creating an impression of a busy, rural landscape (TLP consider pylons not prominent in local area). 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 high quality (TLP consider that the A1(M) is a detracting feature but other long-distance views towards the Chilterns are attractive).

#### Visual Receptors and Representative Viewpoints

3.2.13 The LVIA sets out the approach to the various visual receptor groups at section 4.4. TLP agree with the locations identified at para 4.4.4 for the areas of principal visibility i.e. Graveley Lane, Hertfordshire Way, A1(M) and from the edges of Great Wymondley and Graveley. TLP also agree

- that views from further distance are possible including to the higher ground to the west and south -west (Viewpoints 14, 15 and 16).
- 3.2.14 16 representative viewpoints have been included in the LVIA and are described between paragraphs 4.4.14- 4.4.43 and Appendix 4. TLP agree with the suitability of the selected locations and description with the exceptions:
- 3.2.15 Viewpoints 1-3 These represent views from the Hertfordshire Way. The LVIA states that between VP2 and VP3 where the route passes through woodland that vegetation between the footpath and Site prevents views. TLP accept that there are sections where mainly hedging provides screening. However, there are also sections with more open views across the Site and to the Chilterns as illustrated by Figures 1 and 2 below.



Figure 1. View from Hertfordshire Way (west of VP2) looking south-west



Figure 2- View from Hertfordshire Way (east of VP3) looking south east

- 3.2.16 TLP consider that the visibility of Hitchin and the pylon routes are relatively limited in the views from VP1 and VP2.
- 3.2.17 Representative Viewpoints 6 and 7 are from the edge of Great Wymondley and reflect views from the south of the village. TLP have identified further views (particularly in the winter months) from the Recreation Ground as illustrated by Figure 3 below and from footpath 005 where it passes Milksey Cottages as shown in Figure 04. Views from the later location are more open to the northern part of the site albeit occupying a narrow horizontal strip in the view from this location. There are also views from a section of Priory Lane looking north-east near Milksey Cottages.



Figure 3 View from Great Wymondley Recreation Ground looking east



Figure 4 View from Footpath 005 adjacent to Milksey Cottages/Priory Lane looking east

3.2.18 Viewpoints 8 is included in the LVIA to reflect views from Little Wymondley and Stevenage Road and how the rising ground to the north screens views to the Site. TLP agree with the assessment from Viewpoint 8 and in general the context of Little Wymondley having an enclosed character. However, there is a more open elevated location to the south on Footpath 12 as illustrated by Figure 5 below. The view includes a sub station in the middle distance and the railway line as illustrated in the image below. However, despite these features the southern part of the Site is visible from this alternative location.



Figure 5 - View from Footpath 12 looking north - Alterative 8a to LVIA Viewpoint 8

# 4 Proposed Development

- 4.1.1 Section 2 within the LVIA describes various components of the development, stages of construction and the main proposed landscape mitigation measures.
- 4.1.2 The proposals include: 150,000 photovoltaic (PV) solar panels (height 3m), 22 inverter and transformer stations (3m) and 22 battery storage containers (3m), access tracks, security fencing (2.1m) and 40 security cameras (4m). The scheme also includes mitigation including: planting of hedges and woodland, species rich grassland and pasture together with management of existing hedgerows. The location of the mitigation proposals are 'indicatively' (para 2.2.1) shown on LVIA Figure 1.
- 4.1.3 TLP consider that a 50 MW Solar Farm operational for 40 years represents large and long term scale development.

- 4.1.4 The LVIA does not make reference to different layout options or a process of evolving design to minimise the effects. However, the Planning and the Design and Access Statement (Section 2- para 2.1.2) describes how the western site boundary was pulled back from Willan Road from an earlier iteration to reduce visual effects. It is not clear from the application documents if any other changes to the site area were considered. TLP's comments on further desirable modifications to the layout are provided in Section 5 below.
- 4.1.5 In terms of site selection the Planning and the Design and Access Statement indicates that the Site was influenced by its proximity to the Wymondley Transformer station (c 2-3km). The Planning and the Design and Access Statement does not mention any other potential alternative sites near the Transformer Station. However, most of the land near the Transformer station is also in Green Belt or located on the more steeply rising (and less suitable) topography to the south west.
- 4.1.6 TLP generally welcome the range of measures included within the proposals on Figure 1, which if the application were approved, should be fully detailed and submitted for approval by NHDC before commencement of the works proposals via a suitable planning condition. This should also include a detailed landscape design and Landscape Environmental Management Plan covering a 40 year period.
- 4.1.7 In the interim typical cross sections should be submitted (as part of the current application) on a drawing for approval to clarify typical examples (at locations to be agreed) for existing /new hedges, boundaries, buffers with species rich grassland, stock proof and any other fencing and heights, and solar panel locations. An outline schedule (not full planting plans) of the proposed species, sizes and densities for the proposed hedging and woodland areas should also be provided at this stage to give surety of the intended approach to the mitigation proposals.

# 5 Assessment of Effects

#### 5.1 Construction effects

5.1.1 The LVIA sets out in Section 5 and Appendices 3 and 4 the assessment of landscape and visual effects. TLP have focused on effects at operation stage, which would take place over 40 years. The construction stage is predicted to take 36 weeks and would therefore be relatively short-term in duration which would limit the magnitude of change on the receiving environment and visual receptors. Potential construction effects are set out at LVIA Section 5.2. TLP agree that many of the issues relating to construction stage effects could be covered by an appropriate CEMP condition. The LVIA states at para 5.2.7 that the construction activity would represent a significant effect on views from Graveley Lane and the Hertfordshire Way. TLP agree that such visibility is likely to be of Large Magnitude and therefore significant. However, as the duration is short term any significant effects relating to construction - are unlikely to be determinative.

# 5.2 Operation Stage effects

### Landscape Fabric Effects

5.2.1 The LVIA considers that the susceptibility to change effects on the arable farmland and hedges is low to medium and the value of hedges is low due to the declining condition. While TLP agree that hedges can be replanted/recreated as stated in the LVIA, TLP also consider the value and susceptibility to change are higher at Medium to High. Most of the remaining hedges on the Site

(even if locally gappy) represent historic field boundaries (the exception being the length of 'improved' Graveley Lane nearer the A1(M). The hedges should not only be assessed in terms of whether they could be replaced/replanted but also to reflect their historic value as field boundaries within the landscape.

- 5.2.2 The LVIA considers the existing trees to be of medium to high susceptibility and low to medium value. However, in TLPs opinion the value of the trees will vary with the individual quality of the trees involved, which should be identified through a tree survey (i.e. Grades A, B, C and R). This information has not been provided.
- 5.2.3 It is noted that an Arboricultural Survey or AIA/AMS has not been submitted. While it appears from the layout and LVIA text that the existing hedges and trees within the site would be retained/improved the effect on the trees and hedges should be clarified through a suitable Tree survey (to BS 5837:2012 and at a suitable scale) and Arboricultural Impact Assessment together with a method statement for the retention and protection of established vegetation. This should be submitted prior to determination and include any effects from the cable connection route.
- 5.2.4 TLP note that the scheme seeks to limit the loss of existing hedgerows and trees and at LVIA para 5.3.6 says all will be retained. Furthermore, the LVIA indicates that a 6m grassland strip will be provided between the hedges and trees and the solar panels/ associated infrastructure including fencing. In addition gaps in hedges would be planted and hedges would be maintained at a min height of 3m i.e. comparable height to the solar panels and associated transformers and battery storage units. This aspect of hedge management is considered to be a beneficial approach should the solar farm scheme otherwise be seen as acceptable, but the hedges should not be allowed to grow too tall and open up at the bottom. New tree belts are also proposed to sections of the Site perimeter i.e. to the north, west and east as shown on the Landscape Proposals. The management of these features should be covered by a suitable planning condition of the scheme were considered to be acceptable.
- 5.2.5 The LVIA considers that the change to land use from arable to grazing/mown grassland would be a minor change. However, in TLPs opinion the presence of grassland in place of arable is secondary to the introduction of the solar panels and associated infrastructure. The proposed solar park would be a Moderate to Major and significant change to the current land use for c 40 years. This judgement is made after allowing for the reversible nature of the proposals and the limited effects on the underlying topography. In relation to the intended use of grazing on the land around the solar arrays this is queried in terms of feasibility. While sheep grazing and solar panels may be compatible the likelihood of finding suitable tenant farmers/livestock herds for the size of Site is not justified or discussed. Sheep grazing is not a widespread activity in the locality.
- 5.2.6 TLP agree with the LVIA that the introduction of species rich grassland strips, new and strengthened hedges and woodland areas would strengthen aspects of the landscape structure and bring biodiversity benefits compared to the existing situation. However, the majority of the mitigation seeks to provide visual containment of the proposals rather than to restore landscape character. Previously removed historic hedges are not introduced and the perimeter woodland planting while bringing some benefits is linear in form and will have the disadvantage of restricting longer views currently available e.g. towards the Chilterns.

### Landscape Character

- 5.2.7 The assessment of effects on landscape character is provided at Appendix 3 of the LVIA and summarised at paragraphs 5.3.10-5.3.13.
- 5.2.8 The LVIA focuses on the effects on landscape character on the host LCA at the district scale i.e. on LCA 216 Arlesey/Great Wymondley. The LVIA acknowledges there would be a direct change in land use and increase in the perception of built development with a degrading effect at a localised level, in the short term. However, the LVIA considers there be no loss of landscape fabric through effects on vegetation or landform. In the medium to long term the mitigation planting is considered in the LVIA to provide a greater level of integration and screening. The magnitude of change on LCA 216 overall is assessed as a Medium on a landscape of Medium to Low sensitivity with a resultant Moderate to Minor effect on the LCA. This is assessed to be the same in the short and long term despite the establishment of mitigation. The effect would be long term and adverse.
- 5.2.9 In TLPs opinion agree that the large scale and simple pattern of fields and landscape and proximity to the A1(M) reduces the susceptibility to change. However, the Site is open to view from a number of locations including the Hertfordshire Way at the local level and from some specific locations at a greater distance. TLP consider that effects would be relatively higher at Medium adverse on LCA 216 overall. Even though the development would have a restricted effect in terms of geographical extent within the LCA overall, it still occupies a substantial site area at 88ha that would be subject to a widespread change. The site occupies a central part on the rural landscape between Hitchin, Stevenage and Letchworth as illustrated on Figure 7.
- 5.2.10 LCAs outside LCA 216 are not considered at baseline or assessment of effects stages in the LVIA. However, TLP recognise that these effects would be indirect on the adjacent LCAs and relate more to visual effects.
- 5.2.11 At the Site scale the LVIA considers the effect would increase to Moderate to Major where the fields are occupied by the proposed solar park development. Reference is made in the methodology (Appendix 1 Section 4) to 'significant effects' occurring at above moderate. However the LVIA does not state which of the effects are significant in Section 5 or Appendices 3 and 4. Based on the text in Appendix 3 TLP assume that the effects at the Site scale, classed as Moderate to Major are significant at both the short and long term (however, the text at 7.1.6 may be at odds with Appendix 3 where it says effects ate Moderate and this should be clarified by the applicant).
- 5.2.12 TLP agree that the effects at the site level are Moderate/Major and significant and adverse due to a substantial magnitude of change on a large Site in open countryside. TLP accept that the mitigation involving strengthened of existing hedges and introduction of new hedges and tree belts would reduce the adverse effect on character but still remain significant and adverse. TLP also consider that the significant effects on character at the local level would extend up to c 600m to the west, south and north of the Site. The LVIA does not provide an assessment at a smaller scale to the district scale other than a summary for the Site area.
- 5.2.13 The LCA does not consider the effects at the national NCA or regional scales described in the baseline in Section 4. However, levels of effect are likely to be significant at these larger scales and probably no more than Minor at the regional scale and Negligible at the national scale.

- 5.2.14 As set out above, TLP do not agree with some aspects of the assessment of landscape character within the LVIA, which has focused on the effects at the district LCA scale. TLP consider that the sensitivity of the Landscape character of LCA 216 to the proposed development is slightly higher at Medium rather than Medium to Low. TLP also consider that the effect at a local scale (to c 600mm to the north, west and south) should form another local landscape unit in addition to the Site itself.
- 5.2.15 In relation to the effects on the district character areas within the Application Site TLP accept that the existing field pattern and hedgerow structure would be retained and a range of new landscape elements added, including some positive features such as wildflower meadows and tree planting. However, the majority of the site is proposed for solar panel arrays and together with the associated infrastructure namely fencing, CCTV's, access tracks and the inverter/transformer stations and battery storage containers there would be a net adverse effect on the landscape character. This would be most notable at the site-based scale where TLP consider there would be a Large magnitude of change. Other solar farms are not visible in the wider landscape and therefore the large-scale solar proposal would appear as a new uncharacteristic feature within the existing rural landscape. This lack of other solar farms in the area is not surprising due the Green Belt designation.
- 5.2.16 Table 1 below provides a summary of the differences with the LVIA. Judgements in the LVIA are provided first with those of TLP in brackets. TLP agree with the LVIA that the effect on the character of the Application Site would be Moderate to Major and significant at Year 1 and Year 10. TLP consider that effect would extend to the local area to the west, south and north. TLP consider there would be a relatively higher effect on LVA 216 Arlesey /Great Wymondley at Moderate adverse compared with the LVIA at Moderate to Minor at Year 1 and Year 10. Effects at the NCA and RCT level according to TLP would not be significant.

Table 1

Landscape	Sensitivity	Year 1		Year 10	
Character		Magnitude	Effect	Magnitude	Effect
NCA 87 East Anglian Chalk	Not inc. (Medium)	Not inc. (Small)	Not inc. (Minor)	Not inc. (Small)	Not inc. (Minor)
RLCT- Lowland Village Farmlands	Not inc. (Medium)	Not inc. (Small)	Not inc. (Minor)	Not inc. (Small)	Not inc. (Minor)
LCA 216 Arlesey/Great Wymondley	Medium to Low (Medium)	Medium (Medium)	Moderate to Minor (Moderate)	Medium (Medium)	Moderate to Minor (Moderate)
Application Site	Medium to Low (Medium)	Not inc. (Large)	Moderate to Major (Major)	Not inc. (Large)	Moderate to Major (Major)
Local area - c 600m to north, west and south	Not inc. (Medium)	Not inc. (Large)	Not inc. (Moderate to Major)	Not inc. (Large)	Not inc. (Moderate to Major)

#### Green Belt

- 5.2.17 The Site is fully located within Green Belt. The essential characteristics of Green Belt are their openness and permanence. Section 8 of the LVIA considers the effects on the visual and permeance aspects of Green Belt in the context of the application.
- 5.2.18 The PPG identifies that Green Belt openness has spatial and visual aspects. In terms of spatial effects there is clearly an adverse effect on the openness of the Green Belt by the extensive coverage over the majority of the Site area with solar panels and associated infrastructure, which extends to c 88ha.
- 5.2.19 In terms of visual effects the LVIA identifies a number of significant effects in the short term from The Hertfordshire Way and Graveley Lane. TLP agree with these findings and also identify significant effects from Footpath 7. At distances over c 1km visual effects from a solar farm are considered to be less of an issue as the change in use to energy production by solar panels is more perceived as a change in colour or tone rather than through the introduction of bulky built structures. The visual effects on Green Belt openness would also reduce over time (but not be fully screened) as the mitigation planting establishes.
- 5.2.20 In terms of permeance the proposals would be reversable and therefore the land could revert back to purely agricultural use. However, the likelihood of reversion to agriculture is hypothetical due to the unpredictable state of energy supply methods in 40 years' time. It is possible there would be a case to retain a solar park on the Site.
- 5.2.21 Another consideration with Green Belt relates to the effect on the five purposes of Green Belt. The purpose that most relates to the Site is that of 'assisting in safeguarding the countryside from encroachment'. The LVA says that the development would lead to 'an increase in the perception of built development, which would have a degrading influence at the localised level in the short term.' In TLPs opinion the proposals would be contrary to this Green Belt purpose (spatially and visually) and would have an adverse effect in the short and longer term, albeit reducing to a degree through the mitigation.

## 5.3 Viewpoints and Visual Receptors

- 5.3.1 The LVIA focuses the assessment of visual effects on 16 Viewpoints from publicly accessible locations. Viewpoints 1-11 are all located on roads or rights-of-way close to the site. Viewpoints 12-16 are from more distant locations. The description of effects is focused on the viewpoints but reference is made where the viewpoints form part of a linear route/experience. The main detail is provided for each Viewpoint at Appendix 4 but summarised and grouped in the main text at Section 5.4.
- 5.3.2 TLP disagree with the sensitivity given to a number of visual receptors attributed to the Representative Viewpoints within the LVIA. This includes Viewpoints 2 and 3 on the Hertfordshire Way and Viewpoints 7, 9, 13 on rights of way which TLP consider to be of High Sensitivity rather than Medium or Medium/High sensitivity. The focus of the users on these routes will be focused on the countryside and views. While the A1(M) traffic represents an intrusive feature in some directions most locations have panoramic views across the countryside (including the Site) which in TLPs opinion corresponds with the criteria of High sensitivity defined in Table 3.1 of the LVIA

Methodology as 'People engaged in outdoor recreation, whose attention/interest is likely to be focused on the landscape or particular views, including from public rights of way.' NB TLP agree that the sensitivity of Viewpoint 1 is Medium due to the much closer proximity of the A1(M) at this location. TLP agree with the LVIA that the sensitivity from local roads including Gravelly Lane is Medium (i.e. VP 4 and 5).

- 5.3.3 Views from Hertfordshire Way VP1-3. TLP agree with the levels of effects from VP1 at Moderate to Major (and significant) in the short term and that this would reduce to Moderate to Minor in the longer term as the hedge planting established. It is possible that some of the longer distance views towards the Chilterns would remain. Views from the section of the Hertfordshire Way further from the A1(M) are in TLPs opinion of higher sensitivity than VP1 due to distance from the road traffic.
- 5.3.4 In sections of the route where there are views across the Site, TLP consider the magnitude of change would be Large between VP 2 and VP3 and with a Major adverse and significant effect due to the current open views being dominated by the solar park. The proposed planting along this northern Site boundary includes proposed linear woodland. It is likely that by Year 10 the views to the solar park would reduce as the tree establish. Howevre, the current open outward views would be mainly lost. Therefore, TLP consider the effects at Year 10 would be Moderate adverse rather than Moderate to Minor as included in the LVIA.
- 5.3.5 View from Graveley Road VP 4 and 5. Viewpoint 4 is taken from a gap in the roadside hedge that otherwise provides localised screening over the north of the Site on this section of the road. In the viewpoint photograph there would be a view to the solar panels at the west of the Site boundary and on the rising ground to the north. This would partly remain at Year 10 as there is no planting to a section of the boundary. The hedge should be extended to fill this gap. TLP agree that the effect would be Minor at Year 1 but that this would extend to Year 10 whereas the LVIA considers it would be Negligible at Year 10 as there would be views over the hedging to the higher ground.
- 5.3.6 The effect from VP 5 represents the more open section of the views from the road and would include views over the solar farm to the north of Graveley Road with a Large magnitude of change and Major to Moderate and significant adverse effect. It is likely that the planting of hedges would screen the view of the built development by Year 10 reducing effects to a Moderate to Minor adverse effect.
- 5.3.7 Views from Graveley Lane are mainly experienced by motorists as part of a linear journey. There are aspects of the route travelling both east and west (not reflected in either VP4 or 5) where the main direction of travel and view is over parts of the northern part of the Site and the solar panels will be clearly visible at Year 1 and Year 10. This would lead to greater level of adverse effect. TLP recommend a few changes to the proposals to reduce these affects as set out in the Mitigation Section below and as marked on Appendix 1.



Figure 6 - View from Graveley Lane looking west towards field where solar panels would be clearly visible.

- 5.3.8 **Views from Great Wymondley VP6 and 7.** TLP agree with the level of effect from VP6 near the grounds of the Motte and Bailey castle where trees provide and contain most outward views.
- 5.3.9 TLP consider the visual effects from VP7 on Footpath 002, where there are open views towards the Site, would result in a Moderate to Major and significant adverse effect in the short term. This is greater than the Moderate effect noted in the LVIA in part due to TLP identifying a High sensitivity and the LVIA identifying a Medium sensitivity at this location. The solar panels would occupy a considerable part of the higher ground in the view, particularly at Year 1. TLP acknowledge the effect is likely to reduce to Moderate by Year 10 as the hedging and L shaped belt of trees south of Graveley Lane establish.
- 5.3.10 Stevenage Road Little Wymondley- VP 8 and 8a. TLP consider there would be a lower and Negligible effect from Stevenage Road compared with the LVIA due to the road being set down and as illustrated by the ZTV at Figure 3.
- 5.3.11 An alternative location from Footpath 12 to the south of VP 8 is indicated within the ZTV. The location is considered to be of Medium sensitivity, due to the location of the Sub Station and railway in the view and a Minor level of effects at Year 1 and Year 10. The solar panels would still be seen above any boundary hedges on the southern side of the Site. However the effect from VP 8a is not considered significant.

- 5.3.12 Letchworth Garden City Footpaths 1 and 2 VP9. The LVIA considered the effect Minor to Negligible in the short and long terms from VP 9. The general direction of travel from Footpath 2 is east to west and less towards the Site. However the direction of travel south on Footpath 1 is directly to the Site and the proposals will be part of the view. In TLPs opinion the effect on VP9 would be relatively greater at Moderate to Minor Adverse at Year 1 and reduce to Minor Adverse at Year 10 as the woodland planting to the north establishes.
- 5.3.13 Views from Graveley and East VP 10, 11 and 12. The LVIA assesses there would be no change from Viewpoint 10 as the land rises to the A1(M) and then falls away over the Site. TLP agree with this description although identify there is possibility of seeing the upper sections of the closest row of solar panels and fencing from this location. However, in any event the maximum effect is likely to be Minor at Year 1 and reduce at Year 10 as the proposed hedge replaces any view of panels. The existing view of traffic on the A1(M) creates the most intrusive feature to the west. TLP agree with the assessed levels of effect at VP 11 and VP12.
- 5.3.14 TLP have considered the potential effects from A1(M). There are some views travelling both north and south along the A1(M) across the site to the west. The sensitivity of motorists on this route is considered to be Low and the magnitude of change at most Moderate. The first few rows of panels would be visible from the road at least in the short term with a likely loss of some of the wider distant views. This would give rise to a Moderate to Minor Adverse effect. It is anticipated that effects would reduce to Minor by Year 10 with the introduction of hedging to the foreground.
- 5.3.15 Distant Views from Southwest and west VP 13, 14, 15 and 16. A number of views are included in the LVIA from more distant location including elevated viewpoints in the Chilterns AONB and from the Chiltern Way footpath (VP14). TLP agree with the assessment in the LVIA for these locations. The views are at considerable distance comprising wide ranging panoramas. The Site would appear as a minor feature in the wider views with a backdrop of higher ground and woodland. As the development is up to 3m height it would appear as subtle change in tone (bluey grey) from this distance. The effects would not be significant on these views or on the AONB.
- 5.3.16 Table 2 provides a summary of the of the differences with the LVIA on visual receptors. Judgements in the LVIA are provided initially and those of TLP set in brackets. Where there is a difference between TLP and the LVIA the boxes are shaded

Table 2

Viewpoint	Year 1		Year 10	
	Magnitude	Effect	Magnitude	Effect
1	Medium	Moderate to	Medium	Moderate to Minor
Hertfordshire	(Large)	Major Adverse	(Medium)	Adverse
Way		(Moderate to		(Moderate
		Major Adverse)		Adverse)
2	Large	Moderate to	Medium	Moderate to Minor
Hertfordshire	(Large)	Major	(Medium)	Adverse
Way		(Major Adverse)		(Moderate
				Adverse)
3	Medium	Moderate to	Small	Moderate to Minor
Hertfordshire	(Large)	Major Adverse	(Medium)	Adverse
Way				

Viewpoint	Year 1		Year 10		
	Magnitude	Effect	Magnitude	Effect	
		(Moderate to		(Moderate	
4	Small	Major Adverse) Minor	Small	Adverse) Negligible	
Graveley Lane	(Small)	(Minor Adverse) (Small)		(Small Adverse)	
5	Large	Moderate to	Medium	Moderate to Minor	
<b>Graveley Lane</b>	(Large)	Major Adverse	(Medium)	Adverse	
		(Moderate to		(Moderate to	
-		Major Adverse)		Minor Adverse)	
6	Negligible	Negligible Neutral	Negligible	Negligible Neutral	
East of Great	(Negligible)	(Negligible	(Negligible)	(Negligible Neutral)	
Wymondley 7	Medium	Neutral)  Moderate	Medium	Moderate Adverse	
South Great	(Medium)	Adverse	(Medium)	(Moderate	
Wymondley	,	(Moderate to	,	Adverse)	
		Major Adverse)			
8	Small to	Minor to	Negligible	Not inc.	
Stevenage	Negligible	Negligible	(Negligible)	(Negligible)	
Road	(Negligible)	Adverse			
8a	Not inc.	(Negligible) Not inc.	Not inc.	Not inc.	
Footpath 12	(Small)	(Minor Adverse)	(Small)	(Minor Adverse)	
(Figure 5)		,	,	,	
9	Small to	Minor to	Small to	Minor to Negligible	
Letchworth	Negligible	Negligible Adverse	Negligible	Adverse	
GC Footpath 2	(Small)	(Moderate to Minor Adverse)	(Small)	(Minor Adverse)	
10	No Change No Ch		No Change	No Change	
West edge of	(Small)	(Minor to	(Negligible)	(Negligible)	
Graveley		Negligible)	,		
11	Negligible	Negligible	Negligible	Negligible	
Jacks Hill	(Negligible)	(Negligible)	(Negligible)	(Negligible)	
12	No change			No change	
Footpath Graveley 008	(No change)	(No change)	(No change)	(No change)	
13	Negligible	Negligible	Negligible	Negligible	
Footpath	(Negligible)	(Negligible)	(Negligible)	(Negligible)	
Wymondley					
22	0 11		0 11		
14	Small	Minor Adverse	Small	Minor Adverse (Minor Adverse)	
Footpath Langley 001	(Small)	(Minor Adverse)	(Small)	(Millior Adverse)	
Chiltern Way					
15	Small	Negligible	Small	Negligible	
Hitchin Lane	(Small)	(Negligible)	(Small)	(Negligible)	
16	Negligible	Negligible	Negligible	Negligible	
Deacon Hill	(Negligible)	(Negligible)	(Negligible)	(Negligible)	
Chilterns					
AONB					

5.3.17 In summary, the LVIA identifies that there would be some significant visual effects in the short term at 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 the LVIA and TLP to reduce to levels below significant by 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.

### 5.4 Site Suitability

- 5.4.1 The Application Site is located on gently sloping land that falls from the A1(M) in the east towards Great Wymondley to the west. The existing arable landscape is large in scale with some hedges within and at the edges of the Site and small woodland beyond the site boundary. The Site has some suitability for solar arrays with the fields closer to the A1(M) being the most suitable. The more sensitive fields are those to the north west which draw close to Great Wymondley and are visible from The Hertfordshire Way and Graveley Lane (looking west). The visibility of the Site is relatively restricted beyond the local area (up to 600m to the west, north and south).
- 5.4.2 The proposals would retain the majority (if not all) of the existing hedges and trees and include the introduction of hedgerow improvements, new hedges and tree belts to the northern part of the Site. Strips of wildflower grassland would also be provided adjacent to hedges. These features would be a benefit to improving the structure and vegetation cover but would not restore historic features (e.g. lost hedges). The planting measures would help to reduce significant visual effects in the medium to longer tern (Year 10 onwards).
- 5.4.3 TLP consider that the landscape character and some receptors in the local area would experience some significant effects particularly close to the Application Site. This is to be expected based on the size of the site and extent of proposed solar arrays. The solar park also includes a range of infrastructure elements including fencing, CCTV cameras, access tracks and a range of inverter/transformer stations and battery storage containers placed through the site. At circa 50MW the solar farm would equate to a power output comparable with a c. 25no x 2MW c >100m tall industrial scale wind turbines.
- 5.4.4 While the Site has some suitability for a solar park in TLP's opinion there is scope to further mitigate some of the more residual adverse impacts.

## 5.5 Mitigation Measures

- 5.5.1 The proposed planting, habitat creation, biodiversity enhancements and access measures are considered to be appropriate and TLP would support the provision if the proposals are otherwise considered acceptable. The proposals also accord with some of the landscape management and development guidelines in relation to the published LCAs. The proposed planting seeks to reduce the adverse visual effects. However, in TLPs opinion the mitigation is currently not sufficient to mitigate all of the identified significant adverse effects on character and visual receptors.
- 5.5.2 Therefore TLP recommend the following changes to the proposals:

- a. Reduction of the extent of solar panels on the land closer to Great Wymondley.
- b. Localised removal of panels to provide for more planting at one location on Graveley Road where there would be direct views to the north-east into the northern part of the Site.
- 5.5.3 The locations where modifications are recommended are shown on the attached mark up of Figure 1 at Appendix 1 to this review. Locations 1 and 2 are indicated with the reasons being:

Location 1 – omit panels on sloping land closer to Great Wymondley with views from the village edge and rights of way and in west facing views along Gravely Lane. Add hedgerow to north boundary of field to extend finger to plating to join existing hedge to the east.

Location 2 – Create space for small copse of medium scale trees and shrubs to screen views from Graveley Lane to looking east.

# 6 Presentation of the Findings

- 6.1.1 This section considers the presentation of the assessment including the report text, illustrations, visualisations, and other supporting material.
- 6.1.2 The name of the CMLI authors of the LVIA should be provided.
- 6.1.3 The LVIA report text and Appendices are well structured and straight forward to navigate.
- 6.1.4 The LVIA provides a number of figures that are suitable. Aspects that should have been included are:
  - location of Chilterns AONB,
  - extent of Green Belt,
  - location, names and numbers of other District scale LCAs in the study area,
  - landscape analysis at a more local scale c 1:50,000 to complement Figure 01.
- 6.1.1 The Photographs and Photomontages appear to have followed LI TGN 06/19. However, the reliance on summer photography (September 2021) is less than ideal as it does not reflect a worse case situation.
- 6.1.2 TLP also note that the use of photographs/photomontages by way of a cylindrical projection split across two A1 sheets is in accordance with LI TGN 06/19. However this is impractical to reproduce for use in the field. However, this is foremost a criticism of the LI TGN not the submitted LVIA.
- 6.1.3 The landscape proposals are set out on Figure 1 an A3 drawing at 1:40,000 scale. This is suitable to show an overview of the whole site at A3. However, TLP recommend the inclusion prior to determination of a sheet of typical cross sections at a larger scale c 1.50 to show the arrangement with retained and proposed hedges, woodland, fencing, panels and wildflower grassland areas. Potential locations marked on attached Appendix 1.
- 6.1.4 In addition a typical planting schedule with assumed planting sizes and growth rates (as used in the photomontages) should be provided. Full planting plans would be required by way of a condition should the application be approved.

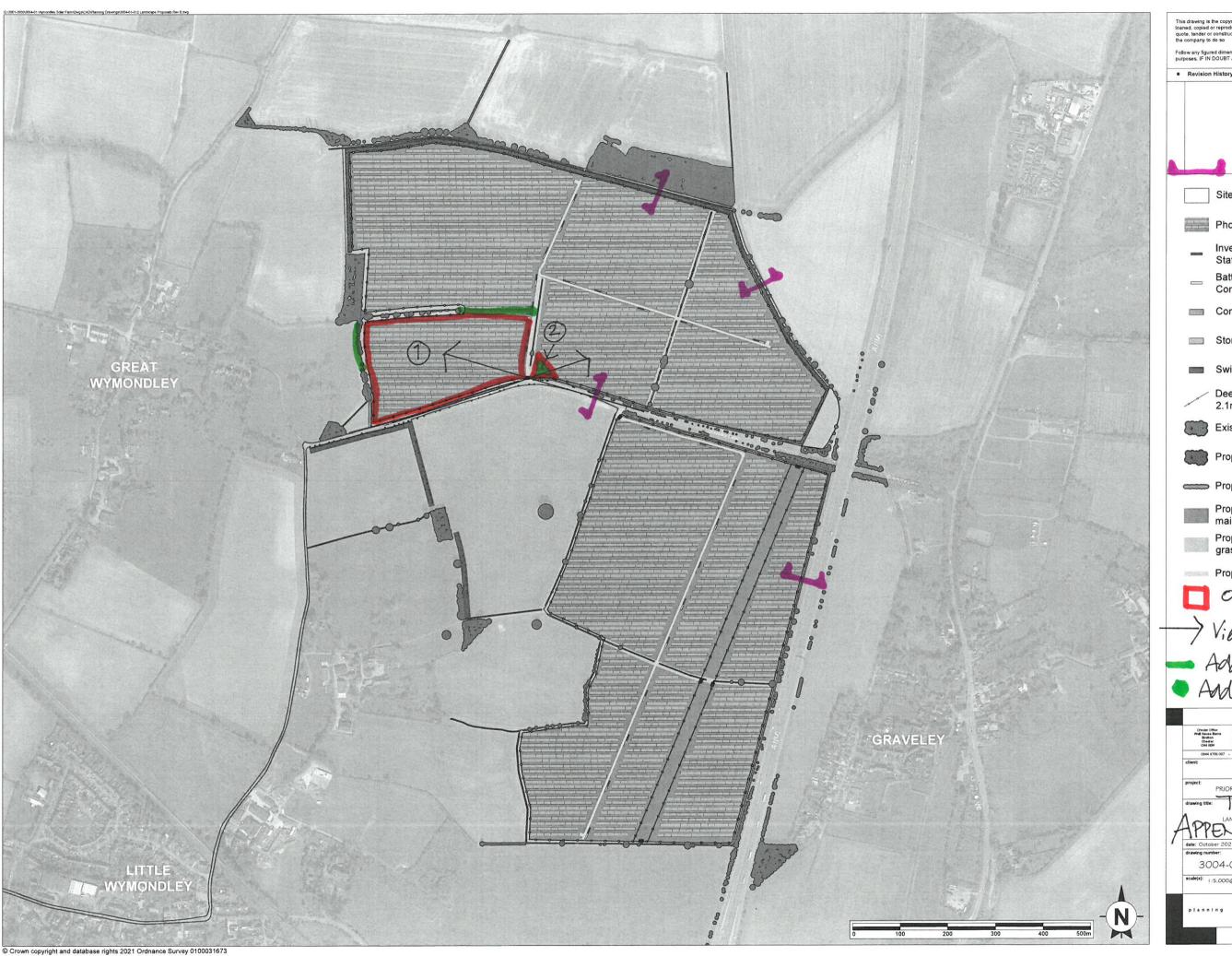
6.1.5 One alternative viewpoint location 8a has been identified by TLP. It would be beneficial to have this included within the report in place of location 8.

# 7 Conclusions

- 7.1.1 Following a review of the LVIA and accompanying planning application documents and plans TLP have reached the following conclusions:
  - the LVIA has largely been prepared in an appropriate and clear manner, providing an proportionate assessment. The LVIA is presented in logical sections utilising a mix of text, tables and figures to communicate the existing baseline environment and the assessment findings;
  - the methodology submitted is broadly in accordance with GLVIA3 with any caveats set out in Section 2 above.
  - The baseline assessment of landscape character and visual receptors is broadly sufficent and appropriate. TLP consider there should have been some reference to the Chilterns AONB, adjacent district scale LCAs and also the inclusion of some additional views as covered by Figures 3, 4 and 5 in Section 3 above.
  - 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.
  - TLP agree with the LVIA that the effect on the character of the Application Site would be Moderate to Major and significant at Year 1 and Year 10. TLP consider that these significant effects would also extend to parts of the local area to the west, south and north.
  - TLP consider there would be a relatively higher effect on LVA 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.
  - TLP consider there would be harm to the openness of the Green Belt in spatial and visual terms
    and also to the purpose of assisting in safeguarding the countryside from encroachment. The
    levels of visual harm would reduce in the longer term with the establishment of mitigation
    planting.
  - 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.

- The proposed mitigation measures relating to hedge planting, gapping up new tree planting, woodland planting wildflower grassland are considered to be generally appropriate and a positive feature of the scheme in terms of mitigation of the solar park. However, the measures proposed do not restore lost features (e.g. former hedges) or provide additional recreation routes. Furthermore the planting proposals while screening views to the built elements introduce features that obscure attractive longer distance views across the countryside;
- In terms of site suitability the Application Site contains aspects such as large-scale arable fields, gently sloping land and proximity to the A1(M) corridor that would be appropriate for solar arrays. Areas that are closer to Great Wymondley are relatively less suitable in relation to the village edge with one field being suggested to be removed from the proposals and other modest improvements as shown on Appendix 1.
- 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.
- This is a large scale, long term solar park scheme extending over 88ha and occupying a substantial part of an open sloping arable landscape. The significant effects identified could be further reduced (but not eliminated) with the omission of recommended areas shown on Appendix 1.



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1:50 Sertim buting Site Boundary

Photovoltaic Panels

Inverter / Transformer Station

Battery Storage Container

Control Building

Storage Building

Switchgear Building

Deer / stock fence 2.1m

Existing vegetation

Proposed woodland Proposed hedgerow

Proposed low

maintenance pasture

Proposed species rich grassland

Proposed access track

Omit Solar Banels

View dong Graveley
Lane

Additional Hedge

Additional Coose

PRIORY FARM SOLAR ARRAY

1PPENDIX 3004-01-012 scale(s): 1:5,000@A2

planning environment design