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Proposed Solar Farm and Battery Storage

Hilfield Farm, Radlett

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1.0 INTRODUCTION

1.1.0 Background

1.1.1 This report relates to a proposed solar farm at Hilfield Farm, Radlett. In part using documentation submitted by the Applicant, the report describes the site and proposals, sets out the primary national and local planning policies, examines the planning issues and then sets out conclusions with a recommendation.

1.3.0 Summary

1.3.1 In summary the report concludes that the proposal would cause harm to the openness and purposes of the Green Belt, which defined harm, in carrying out the required balancing exercise is not outweighed by other considerations. Consequently, very special circumstances do not exist and the application should be refused planning permission. In addition harm will be caused to users of the footpaths that cross the site. These constitute sound and clear cut reasons to refuse planning permission.

2.0 SITE & SURROUNDING AREA

2.1. The application site is located in open countryside between Radlett to the north, Borehamwood to the east, Elstree to the south and Watford to the west. It is split into two parcels totalling some 130 hectares. The western parcel is contained by the A41 to the west and Elstree Aerodrome to the south. The eastern parcel abuts Watling Street to the east and Butterfly Lane to the south.

2.2 The land is agricultural in character and variously described in the application documents as:

"...within an agricultural landscape..."

"The site is semi-suburban in character..."

(Planning Statement)

"...semi-rural in character with some localised intrusion of man-made features."

"...wholly comprises.....agricultural land..."

(Design and Access Statement)

2.3 The Applicant's Planning Statement analysed the impact on the Green Belt and references the Hertsmere Borough Council Green Belt Assessment 2017, the application site falling within Green Belt Parcels 9 and 19. This assessment notes that approximately 7% and 3% respectively of the Parcels are covered by 'built form'.

3.0 RELEVANT PLANNING HISTORY

- 3.1 **Central Government Policy.** The main plank of Government planning policy is the National Planning Policy Framework February 2019 (NPPF). Of particular relevance to the proposals are Section 13: Protecting Green Belt land and Section 14: Meeting the challenge of climate change, flooding and coastal change.
- 3.2 **The Development Plan.** This comprises the Hertsmere Core Strategy 2013, with Policy SF1 – Creating sustainable development, and Policy CS13 – The Green Belt, of particular relevance to the proposals.

4.0 THE PROPOSALS

- 4.1 The application seeks to provide a solar array together with associated battery storage containers, a substation and an inverter/transformer station over a site area of some 130 hectares split into two parcels.
- 4.2 **Temporary Development.** Whilst the description of the development makes no reference to the development being temporary, the supporting documentation refers to a 35 year ‘operational phase’, following which the development would be removed and the land restored to agriculture.
- 4.3 **Rational for the siting.** The application site was chosen due to its proximity to the National Grid Elstree Substation, which *“avoids considerable delay in receiving both the connection with the Distribution Network Operator (and) land (ownership).”*
- 4.4 **Dual Use.** The proposal would provide *“...the potential for low intensity sheep grazing.”*
- 4.5 **Built Development.** In addition to the 3m high, 31m wide, solar arrays, there would be some 3,000 cubic metres of built development in the form of 36 shipping containers. Of these, 16 would be located throughout the site, with the balance of 20 in a storage area rear of the Elstree National Grid Substation.
- 4.6 Further floorspace would comprise a substation of 289cu.m., 4.2m high and a control room of 94cu.m, 3.9m high. This provides a total of some 3,400cu.m.
- 4.7 **Fencing.** The site and those public rights of way (PROW) that run through the site would be enclosed by 2.1m high, welded mesh fencing on timber posts. A buffer offset/stand off of at least 5m either side of a PROW would be provided.
- 4.8 **Biodiversity Gain.** As part of the proposals there would be over 7.5ha of grassland and flower planting; 6.7ha of low intervention skylark habitat; 2ha of parkland; two nature areas; and 2.4km of green corridor. The applicant estimates an increase in habitat biodiversity of 40% and in hedgerow biodiversity of 23%.
- 4.9 **New Permissive Path.** 578m of permissive path would be provided linking to the Hertfordshire Way and providing an alternative route around Belstone Football Club’s pitches.
- 4.10 **Construction Access.** This would be from the M1 Junction 5 and the A41, and so onto the road network of Aldenham Road, Butterfly Lane, Dagger Lane and Sandy Lane.
- 4.11 **Maintenance.** Once operational, there would typically be two maintenance visits per month in a small van or car.
- 4.12 **Carbon Reduction.** The proposal would provide some 50MW of power each year of generation to the National Grid, the equivalent of the annual electrical needs of some 15,600 family homes, and representing an emission saving equivalent to a reduction of 8,100 cars

on the road every year. It is estimated that the solar farm would increase the total amount of renewable electricity generated in Hertsmere from 5.4% to 20%. (Ofgen calculates that, in Quarter 3 of 2020, 40% of the electricity supply within the UK was produced by renewables, mainly driven by high volumes of wind generation.)

5.0 PLANNING CONSIDERATIONS

5.1 In the context of the NPPF and development plan, I consider that this application raises the following issues:

1. Would the proposal have an undue impact on the character of the landscape in the area?
2. Would the proposal have an undue impact on users of the Public Rights of Way which cross the site?
3. Would the proposal aid farm diversification and the rural economy?
4. As inappropriate development in the Metropolitan Green Belt, are there other considerations which outweigh the defined harm and any other harm.

Taking each in turn below:

6.0 **Issue 1. Would the proposals have an undue impact on the character of the landscape in the area?**

6.1 The application site comprises 130ha of open agricultural land located between Watford, Borehamwood and Radlett. Whilst there is some urban influence, given this location and proximity to London, the site remains open. By proposing its development for a solar park, there must be some impact on the wider landscape. Impact from within the site on the users of the PROW that cross the site is dealt with in Issue 2 below.

6.2 **The Applicant's case.** The character of the application site is described by the Applicant as *"...semi-rural in character with some localised intrusion of man-made features."* In respect of this degree of urban intrusion reference is made to the HBC Green Belt Assessment 2017 wherein the wider Parcels of land containing the application site were estimated to be *"approximately 7% and 3% respectively covered by 'built form'"*.

6.3 Against this backdrop the Applicant's landscape consultants used and an industry standard tool, a landscape visual impact assessment (LVIA) to analyse the visual impact of the proposals on the character of the landscape, noting there were no landscape designations that could be affected by the proposal.

6.4 In respect of receptors, i.e. viewers of the proposal from a maximum of 2km outside the site, the consultants noted that the arrays had been set back from these receptors and would be screened by existing and proposed vegetation.

6.5 In terms of the magnitude of effect, this was assessed against a range of impacts set out in the LVIA as follows:

- Large - total or major alteration of views
- Medium - partial alteration to key elements
- Small - minor alteration to key elements
- Negligible – very minor alteration to key elements

It was concluded that, in the medium term, i.e. 2 - 10 years, for views from the following locations the magnitude of change would be:

1. Hilfield Lane - Medium
2. Letchmore Heath - low/Negligible
3. Bushey - Negligible
4. Butterfly Lane - Medium
5. Aldenham Road – Medium
6. Watling Street - Medium

6.6 In the longer term i.e. 10 – 25 years, the magnitude of change effect is Low (Small) or Negligible. In terms of the significance, i.e. importance, of the effect on the view, this is a factor combining the Magnitude of Effect with the Sensitivity of the particular landscape, which, in the case of the application site, does not have any protected landscape designation, and so provides a Significance in the long term of Moderate from Hilfield Lane to Slight for the remaining viewpoints.

6.7 Consequently, the landscape consultants were able to conclude that, whilst there would be an adverse impact on the landscape resulting from the proposal:

“For visual receptors in the immediate vicinity of the site, (i.e. within 150m), effects would range from Moderate to Slight Adverse”,

“All other visual receptors would experience Negligible visual effects.”

6.8 **An analysis of Issue 1.** The application proposes to site 3m high by 31m wide solar arrays, 36, 2.9m high containers and two other 4.2m high buildings in various locations on 130ha of agricultural land, located within the Borehamwood Plateau Landscape Character Area (LCA) of the Hertfordshire Landscape Assessment. The application site forms an area of relatively flat land within this large swathe comprising the plateau. The site has a gently undulating character of agricultural fields to the eastern parcel, with the western parcel having a bowl-like landform as it rises up to Elstree Aerodrome. This landform, as it is not overlooked from higher ground, and the existing screening serve to limit views into the application site.

6.9 The application proposals would not result in the loss of any existing hedgerows or individual trees, and would be enhanced with new planting and/or a relaxation of the existing management regime.

6.10 Given the small scale and mass and the relatively low height of the proposals and their dispersal throughout the site, with existing and proposed landscaping restricting views from the wider area, I consider that the landscape consultants are right to conclude that, whilst the

proposals would by definition have an adverse visual impact, the significance of the impact on viewers within 150m of the site would range from Moderate to Slight Adverse but beyond this all other viewers would experience Negligible visual effects. Consequently, I consider only limited visual harm would be caused to the Green belt.

7.0 **Issue No 2: Would the proposal have an undue impact on users of the Public Right of Way that crosses the site?**

7.1 **The Applicant's Case.** The existing network of Public Rights of Way (PROW) that cross the application site would be retained, with an additional 578m of new permissive paths. The PROW would be contained within 2.1m high, welded mesh fencing on timber posts. A buffer offset/stand-off of at least 5m either side of a PROW would be provided.

7.2 The Landscape and Visual Impact Assessment (LVIA), in respect of eight viewpoints from PROW within the site, notes at Table 2: Viewpoint Scale of Effect and the supporting text, that there would be:

- Large Adverse Effects in the Medium Term (2-10 years), and
- Medium Adverse Effects, Large/Medium Adverse and Large Adverse Effects in the Long Term/Semi-Permanent (10-25 years at least)

to all but Footpath Aldenham 40, where the Long Term/Semi-Permanent effect would be Small Adverse. These values reflect the fact that:

“Given these routes are within the Site, the recreational experience from these would change substantially, with undeveloped agricultural fields replaced by built development.”

A high magnitude of change is anticipated resulting in Major – Moderate and Adverse effects.

7.3 **The sensitivity of PROWs.** Given the location of the site close to the urban settlements of Watford, Radlett and Borehamwood, these PROW can be expected to offer a valuable recreational asset to their populations, which I consider increases their sensitivity to adverse effects.

7.4 **Analysis of Issue 2.** The Applicant's very fairly accept that for users of the PROW which run through the application site there would be a Large Adverse visual effect in the medium term, 2 – 10 years, and for Footpath Aldenham 40, Medium, Large/Medium and Large Adverse visual effect thereafter. This adverse visual impact arises from the change in views from *‘undeveloped agricultural fields being replaced by built development’*, the PROW running between 2.1m high fencing set 5m back from the footpath. Even when landscaped, this channelisation would reduce the recreational value of these routes. This is particularly pertinent given the proximity of the site to neighbouring towns and villages, whose residents no doubt value this network of footpaths.

7.5 Furthermore, the result of fencing the footpaths would not be limited to a visual impact. High fencing can give a perception of being contained, which is not conducive to the enjoyment of the open countryside. Also, with no ‘escape’ route available, this can be daunting for lone walkers, making the use of the footpath a potentially uncomfortable and unpleasant experience, one to be hurried. This could possibly lead to an alternative route

being chosen, if such is available in this urban edge location, or result in people being deterred from walking at all.

- 7.6 In combination I consider these two factors of visual harm and the containment of the PROW within high fences would have an adverse impact on the recreational value of these highways. Great weight should be placed on this harm.

8.0 **Issue 3. Would the proposal aid farm diversification and the rural economy?**

8.1 **The Applicant's Case.** The Applicant argues that the proposal would aid farm diversification and the rural economy. The NPPF at paragraph 83b, and the development plan, encourage *"diversification of agricultural and other land-based rural businesses"* which is *"sensitive to its surroundings"* and *"also encourages the use of previously developed land"*.

8.2 As accepted by the Applicant, the use would relate to 130ha of agricultural land divided into 20 fields and currently used mainly for production of arable crops. Should the application scheme proceed, development would be reversible, allowing the agricultural use to recommence at a later date. During the period the development was operational, the Applicant considers that the soil health and soil organic carbon can be improved through land use change from *"intensive arable to grasslands"*. Once developed, the Applicant notes the potential for low intensity sheep grazing.

8.3 Agricultural land can be graded from Grade 1 – Excellent to Grade 5 – very poor, with Grade 3 subdivided into Grade 3a – good quality and 3b – moderate quality.

8.4 The NPPF at paragraph 170 under Section 15: Conserving and enhancing the natural environment, refers to the need to protect soils in a manner commensurate with their quality identified in the development plan and Footnote 53 to paragraph 171 states:

"Where significant development of agricultural land is demonstrated to be necessary, areas of poor quality land should be preferred to those of a higher quality".

8.5 The HBC Site Allocation and Development Plan (SADMPF) adopted 2016, at Policy 17: Diversification and Development supporting the Rural Economy, states that

"Proposals for the diversification of farm enterprises.....will be permitted provided:

(i) The site is of lower agricultural land grade (i.e. Grade 3b, 4 or 5 or non-agricultural)"

This document precedes the NPPF by 3 years.

8.6 The Applicant's agricultural land classification consultants have graded the application site as Grade 3b, i.e. moderate quality agricultural land. (This is defined by the Government as:

"land capable of producing moderate yields of a narrow range of crops, principally:

- *Cereals and grass*
- *Lower yields of a wide range of crops*
- *High yields of grass which can be grazed or harvested over most of the year."*)

8.7 The Applicant's consultants note that:

"the land classified as Subgrade 3b is limited entirely by soil wetness" and that:

"agricultural land at the site could be graded as high as Grade1, in the absence of any other limiting factor".

- 8.8 **The amount of high-grade agricultural land in the Borough.** Based on the Natural England Agricultural Land Classification Maps, Hertsmere Borough has very little Grade 1 and 2 (excellent/good) land, the bulk being either Grade 3 or 4 (moderate/poor) land. Consequently, where most of the agricultural land is not of a high grade, even land in 3b can be considered to be of moderate sensitivity i.e. a valuable resource. Conversely, in areas where high grade land is not uncommon, Grade 3b land could be considered to be of low sensitivity.
- 8.9 **The capacity of the site to accommodate grazing sheep.** The Applicant acknowledges that the site has the potential for low intensity sheep farming. The Building Research Establishment (BRE) document 'Agriculture Good Practice Guidance for Solar Farms 2014' provides a guide of between 4 and 8 sheep per hectare and noted that this was similar to stocking rates on conventional grassland. This provides notional capacity of some 1000 animals.
- 8.10 **Continued input into the rural economy from the solar farm.** Putting aside any financial contribution to the farmer from the solar array and the grazing of a flock of some 1,000 sheep, the Applicant notes that the site will generate 2 maintenance visits per month.
- 8.11 **Analysis of Issue 3.** Considering the proposal in the light of paragraphs 8.1 to 8.10 above, I consider that the following can be seen:
- 8.12 **The proposals would reduce the ability of the site to grow crops.** The scheme would take out of production 130ha of arable land and potentially use it to graze sheep. Over such a large site this would appear to be arable/crop displacement rather than farm diversification.
- 8.13 Whilst the applicant proposes the grazing of sheep on the land once the scheme is implemented, the phrase 'potential' is used, i.e. there is no guarantee.
- 8.14 The applicant makes much of the fact that the land is Grade 3b and so not of the best and most versatile quality. However, as noted above, even Grade 3b land is of moderate quality and capable of providing moderate yields of cereals and high yields of grass. As much of the agricultural land in the Borough is of Grade 3 quality, its agricultural value should not be dismissed on this basis alone.
- 8.15 **Following installation of the solar array it will provide negligible benefits to the wider rural economy.** Putting aside the payment to the landowner and the income from the potential to graze sheep, the Applicant states that the solar farm would be visited no more than twice a month for routine maintenance. Even assuming these visitors buy food/fuel in the locality, the continuing financial benefit to the rural economy would be negligible from this very low level of activity.
- 8.16 **The soil health of the land could be improved by other methods.** The applicant maintains that on agriculture recommencing once the array etc. is removed, the soil health and soil organic carbon would have been improved through land use change from arable to grassland. However, soil health could be improved without the intervening development of the site as a solar farm.

8.17 Consequently I consider only limited weight can be given to farm diversification as a rationale for allowing the solar farm to proceed.

9.0 **Issue 4. As inappropriate development in the Metropolitan Green belt, are there other considerations which outweigh the defined harm and any other harm?**

9.1 The starting point to consider any scheme within the Green Belt is: Does the proposal fall within the defined number of developments considered to be 'not inappropriate' or is it considered to be inappropriate? If considered to be not inappropriate there is no need to carry out a Green Belt balancing exercise or consider very special circumstances (VSC). However, in this case the Applicant has accepted that the proposal is inappropriate development and so the following must be considered:

1. The effects on the openness and Green Belt function of the land.
2. Would there be any other harm i.e. non-Green Belt factors, for example character and appearance, that weigh against the development?
3. Are there any 'other considerations' which would weigh in favour of it?
4. If 'other considerations' exist, do they clearly outweigh the harm to the Green Belt, and any other harm? This is the balancing exercise.
5. If 'other considerations' outweigh the harm, do VSC exist?

9.2 **Very special circumstances.** VSC do not need to be unique but exist where potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposals are clearly outweighed by other considerations. (Paragraph 144 of the NPPF).

9.3 **Green Belt openness.** This is the most important attribute of a Green Belt, keeping land permanently open. The openness of a Green Belt has a spatial as well as a visual aspect. Consequently, the absence of visual intrusion does not in itself mean there is no impact on the Green Belt. Whilst development not involving the construction of new buildings may not impact on the spatial aspect of the Green Belt, it could well have an adverse visual impact. This impact could also relate to the purpose of a building. There is a need therefore to separate out an assessment of any effects on openness from any assessment of effects on character and appearance.

9.4 The National Planning Policy Guidance (PPG), which supplements the NPPF, states that in making an assessment on openness, one factor to be taken into account is "*the duration of the development and its remediability...*". Consequently, whilst inappropriate development would still cause substantial harm to the Green Belt, the degree of any other harm could potentially be reduced if the proposal were temporary.

9.5 **The purposes of the Green Belt.** It serves 5 purposes:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding countryside encroachment;

4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

9.6 **The Applicant's case.** Having accepted that the proposals are defined as inappropriate development, the applicant promotes the development on the basis that very special circumstances (VSC) are present which outweigh the defined harm and any other harm. That part of the NPPF relating to Green Belt, at paragraph 147, states that:

"... very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources".

9.7 In respect of openness, the applicant prays in aid that the development is not intended to be permanent and would be reversible, with a *"... lifetime of 35 operational years."*

9.8 In respect of any visual impact, the applicant considers the site to be visually well contained by existing vegetation and this will be strengthened as part of the proposals.

9.9 VSC are put forward by the applicant as follows:

1. Increasing renewable energy generation.
2. Climate emergency.
3. Energy security.
4. Best available technology.
5. Good design.
6. The lack of alternative sites.
7. Temporary and reversible impacts.
8. Biodiversity net gain.
9. Soil regeneration.
10. Green infrastructure.
11. Farm diversification.
12. Transmission/distribution connection.

- 9.10 **An analysis of Issue 4.** Given that the Applicant has very fairly accepted that its proposal is by definition inappropriate development, then the harm to the Green Belt must be substantial and carries great weight in the balancing exercise.
- 9.11 **What is the impact of the proposal on openness?** The site of 130ha, of open agricultural land, would become a solar farm with rows of arrays 3m high, located 3m to 4.5m apart, 36 containers each 2.9m high, two other buildings at 4.2m high and measuring 3,300cu.m. in total, located in 17 locations across the site. This degree of development, combined with the 2.1m high security fence, must have a substantial impact on, and cause significant harm to openness by reason of its spatial aspect and the industrial nature of the proposed buildings. Consequently, the land would not be kept permanently open. This degree of harm must carry significant weight.
- 9.12 **What is the impact of the proposal on the purposes of the Green Belt?** The Applicant's Planning Statement refers to the HBC Green Belt Assessment 2017 and Parcels 9 and 19 within which the application site falls.
- 9.13 In respect of Parcel 9, the westernmost parcel adjoining the M1, it provides a score of 3 out of 5 for Purpose 2: to prevent neighbouring towns from merging and Purpose 3: to assist in safeguarding the countryside from encroachment.
- 9.14 In respect of Parcel 19, the easternmost parcel abutting the southern edge of Radlett and adjoining Watling Street, it has a 3 out of 5 score for Purpose 2 and 5 out of 5 for Purpose 3.
- 9.15 I consider these relatively high scores are indicative of the substantial harm the proposed development would cause to these two purposes, which should carry significant weight in carrying out the balancing exercise.
- 9.16 **Is there any non-Green Belt harm?** I have dealt with the visual impact of the proposal on the character of the landscape in the area and users of the PROW that cross the site under Issues 1 and 2 above. I have shown that there is limited harm to the wider landscape but that there is significant harm to users of the PROW.
- 9.17 **Are there other considerations which might weigh in favour?** The applicant has put forward a number of other considerations which it says weigh in favour of the proposal. I will take each in turn below:
- 9.18 **Increased renewable energy/climate emergency/energy security.** Great emphasis is placed upon the amount of renewable electricity generated in Hertsmere, increasing as a result of the proposal from 5.4% to 20%, so approaching the national average of 40%. However, and given that most renewable electricity generation is wind driven, there is nothing in Government policy that requires Local Planning Authorities to be self-supporting in energy production. Consequently, I consider very little weight can be placed on this consideration.

- 9.19 **Best available technology/good design.** I cannot comment on the proposed technology but this still relies on 3,300cu.m. of buildings and arrays of solar panels. Consequently, I consider that carries very little weight.
- 9.20 **The lack of alternative sites.** The search was driven by the need to be within a 5km radius of the Elstree substation. Consequently, all of the area of search is either built-up or within the Metropolitan Green Belt. Given the narrow area of search based only on one substation, rather than a UK-wide search, I consider little weight can be given to this factor.
- 9.21 **Temporary and reversible impacts.** The relevant PPG recognises that the duration of a development and its remediability is a factor to be taken into account. In this case the Applicant considers the proposal is reversible and has a “...lifetime of 35 operational years”. I note the PPG referred to by the Applicant in support of this ‘temporary’ use does not specify what ‘temporary’ amounts to.
- 9.22 In addition the Applicant uses the phrase ‘operational’ years (my emphasis). This could imply that, should electricity generation policies and prices vary over that period and the array is off-line for periods of time i.e. non-operational, then the 35 years would be a minimum period. In any event I consider that 35 years cannot be considered to be temporary.
- 9.23 Consequently, I consider little weight can be given to the temporary nature of the proposal, the harm arising from it being on site for a minimum of 35 years would be substantial.
- 9.24 **Biodiversity net gain/ soil regeneration/green infrastructure.** The proposals would provide biodiversity net gain over the existing use of the site as intensive arable. However, some of these gains, and soil regeneration, could be achieved by alternative farming practices, which may be driven by post-Brexit farm subsidy schemes or other measures. Therefore, I consider that only moderate weight can be attached to this factor; not all of the proposed development would be required in order to provide the total benefits.
- 9.25 **Farm diversification.** I have dealt with this under Issue 3 above, where I show that only very limited weight can be given to this factor.
- 9.26 **Transmission/distribution costs.** As is made clear by the applicant, the application site has been identified due to the desire to locate close to a National Grid connection and just as importantly, to secure the land. In that other land outside the Green Belt, potentially previously developed land (PDL), may be available means that very limited weight can be given to this factor. Indeed, I note from the BRE document Agricultural Good Practice Guidance for Solar Farms, that Wymeswold Solar Farm, Leicestershire estimated to power 8,500 homes, which at 2014 was the UK’s largest connected solar farm, was built on a disused airfield and received no objections during the planning process.
- 6.27 **Carrying out the Green Belt balancing exercise.** I have shown above and in Issues 1, 2 and 3 that the proposal will cause significant harm to the openness of the Green Belt, Green Belt purposes and to recreational users of the Green Belt. Balanced against this, is the moderate weight given to the biodiversity/soil regeneration/green infrastructure benefits.

9.28 **Do VSC exist.** I have shown that the other considerations do not clearly outweigh the totality of the harm caused by the proposal. Very special circumstances do not exist and so the application should be refused planning permission.

10.0 CONCLUSIONS

- 10.1 This report relates to a proposal to site a solar panel with its attendant structures on a 130ha open site in the Green Belt.
- 10.2 I conclude that there would be only limited harm to the character of the landscape due to its undulating form, existing and proposed landscape screening and limited height of the solar array and other structures which are proposed.
- 10.3 I conclude that there would be substantial visual harm to users of the PROW that cross the site due to the high magnitude of change, which will have a Major-Moderate Significance to these users. I consider this Significance is increased by the number of actual and future users of the PROW in the nearby towns and villages and the ‘canalisation’ of the route, so reducing the vista beyond the 10m corridor and reducing interest to users, by looking through metal fences to an industrial landscape. This causes significant harm to the visual dimension of openness.
- 10.4 I conclude that the proposals would not aid long term farm diversification beyond the payment to the landowner and the potential for sheep grazing. Any other benefits thereafter to the rural economy are small as the site would be left unattended. Consequently, only limited weight can be attached to this consideration.
- 10.5 I conclude that, as accepted by the applicant, the proposal is inappropriate development and remains so, despite the opportunity for the Government to define renewable energy development as not inappropriate in the revision of the NPPF in 2019. Consequently, and by definition, the proposal would cause harm to the Green Belt, which carries significant weight.
- 10.6 I consider the harm caused to the Green Belt openness must carry significant weight. Notwithstanding the description of the site by the applicant as “*semi-suburban in character*” it is 130ha of underdeveloped, open farmland. The proposals will develop the site and by definition harm openness, the most important attributes of a Green Belt.
- 10.7 I consider the proposal, by developing open land, will harm the purposes of the Green Belt i.e. by reason of preventing neighbouring towns from merging and safeguarding the countryside from encroachment. Great weight must be placed on this factor.
- 10.8 In respect of other potential harm, I conclude limited weight can be placed on the availability of this site for renewable electricity generation. There is no evidence that other non-Green

Belt sites adjoining substations are unavailable or that each LPA must be self-contained regarding electricity generation.

- 10.9 I conclude that the undoubted benefits to biodiversity/soil health are not exclusive to the proposal and could arise by other means, such that only moderate weight can be applied.
- 10.10 I conclude that little weight can be placed on the temporary nature of the proposal given that it will have at least 35-year operational lifespan. This lifespan could potentially become longer if for any reason the array was not operational for a period of time. In any event I do not consider 35 years as temporary in respect to harm to the Green Belt.
- 10.11 In drawing these conclusions together I consider that the other considerations in this case do not clearly outweigh the harm set out above. As the very special circumstances necessary to justify the development of this Green Belt do not exist, I consider the application should be refused for the following reasons:
1. Harm to the openness and purposes of the Green Belt by reason of inappropriate development and the absence of very special circumstances to outweigh the defined harm and other harm.
 2. Harm to users of the PROW that cross the site by reason of adverse visual impact, from a restricted view to an industrial landscape and the perception of the 'channelling' of these routes, making them less valuable as a recreational resource.