

Hilfield Solar Farm, Aldenham

Presentation by Valerie Scott, HCUK Group

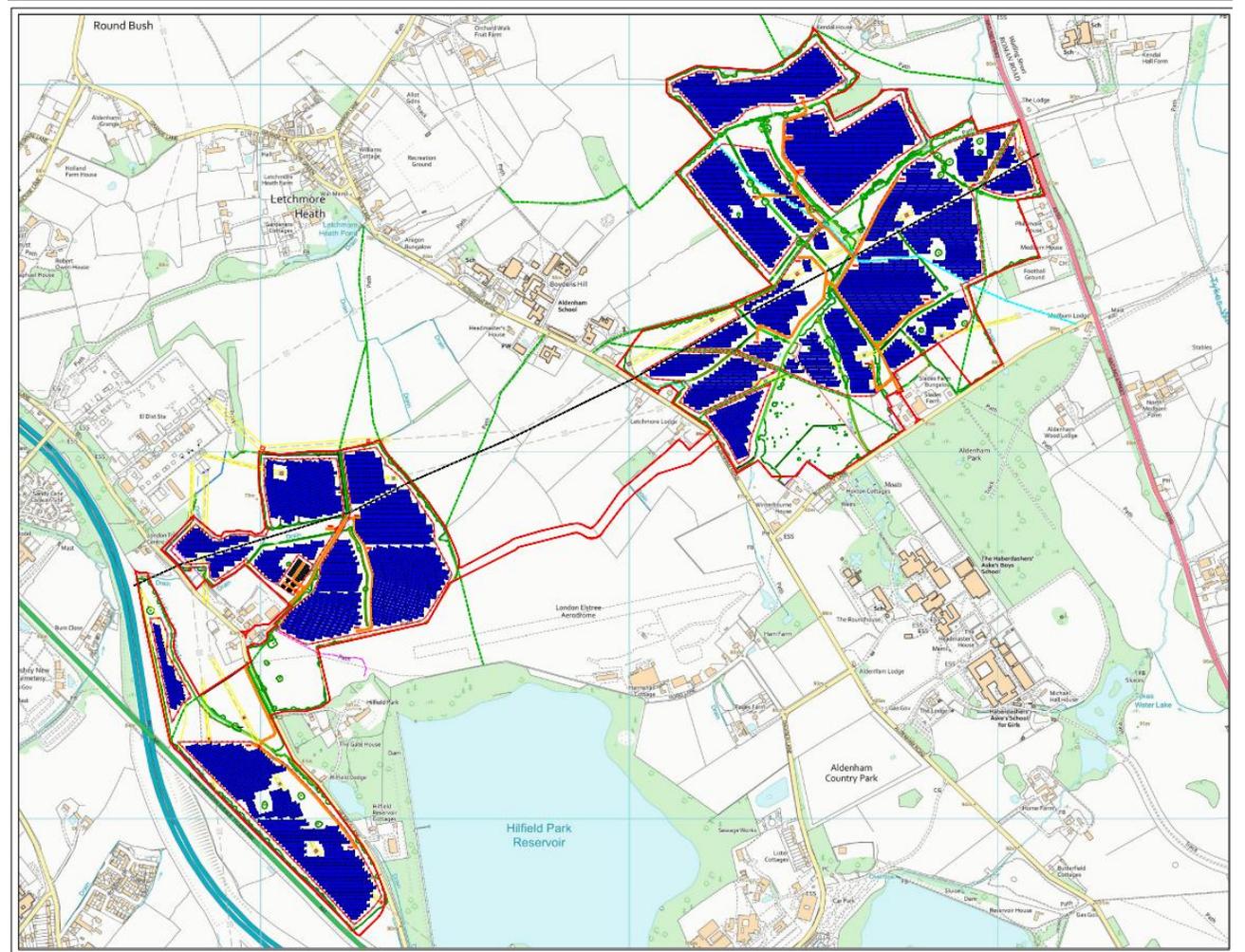
Introduction

- My name is Valerie Scott and I am the Principal Planning Consultant of HCUK Group, which is a company specialising in planning, heritage and landscape matters in relation to development.
- HCUK Group were instructed by Aldenham Parish Council to provide evidence on behalf of the Parish Council at the forthcoming Public Inquiry into the refusal by Hertsmere Council of a proposed solar farm by Elstree Green Ltd.
- I will be providing the planning evidence, but in addition a Heritage Statement has been provided by Dr Jonathan Edis, Heritage Director, HCUK Group and a Landscape Statement by Claire Browne, Landscape Director, HCUK Group. I refer to both of these statements in my proof of evidence.

Proposed solar farm

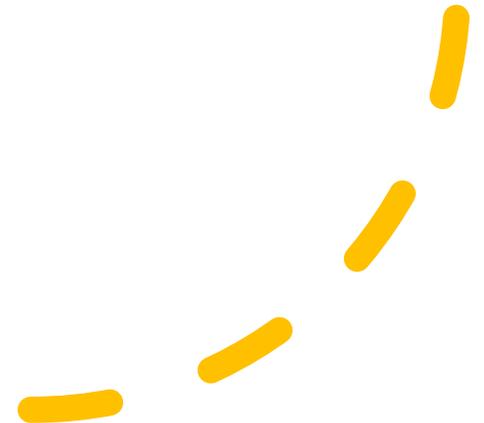
-The solar farm would be on 130 hectares (321 acres) of undulating agricultural land, which is within the Green Belt. It comprises three parcels of land as follows:

- Land east of Aldenham Lane and north of Butterfly Lane, close to HABS school;
- Land surrounding Hilfield Farm, south of Elstree Substation and north of Elstree Aerodrome; and
- Land west of Hilfield Lane and close to Hilfield Castle.



Main concerns of Aldenham Parish Council

- Inappropriate development in the Green Belt resulting in significant urban sprawl and loss of open countryside;
- Impact on the character of the landscape;
- Impact on public rights of way;
- Impact on rural economy;
- Lack of consideration of alternative sites;
- Impact on the long term character of the area;
- Impact on wildlife;
- Impact due to noise;
- Impact on flooding;
- Limited public benefits; and
- Impact on heritage matters.



Harmful effect on the Green Belt

- The proposed development is ‘inappropriate development in the Green Belt’ which is by definition harmful and should not be approved except in ‘very special circumstances’. (para 147 of the National Planning Policy Framework (NPPF)).
- The NPPF does, however, state that “*Very special circumstances’ may include the wider environmental benefits associated with increased production of energy from renewable sources*”. (NPPF para 151).
- However, this by itself does not provide justification to allow development of the size proposed in an area of such great sensitivity and importance.

Impact on character of the landscape

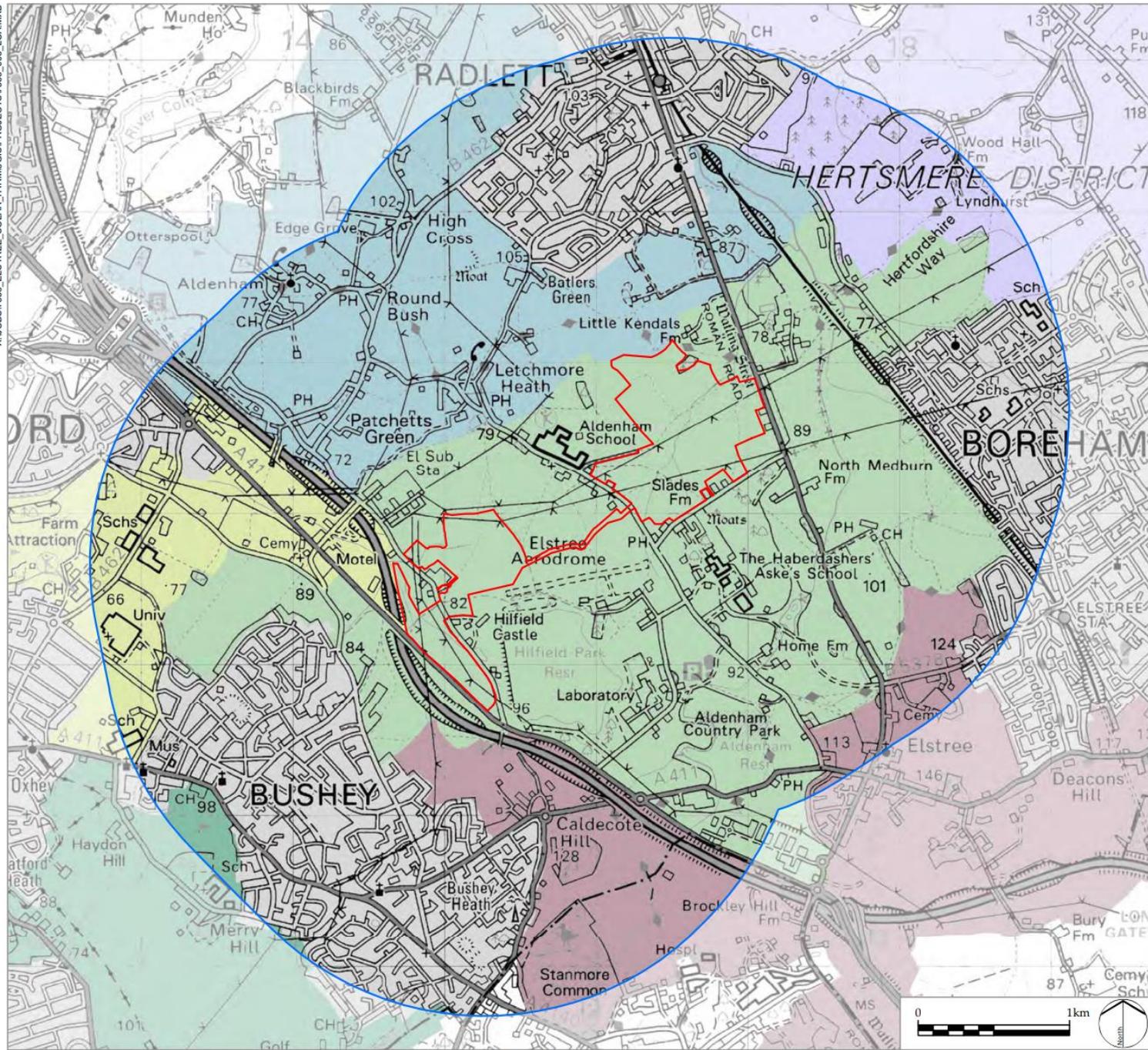
The Landscape Statement prepared by Claire Browne provides a review of the Landscape and Visual Assessment (LVIA) prepared by LDA Design on behalf of the Appellant.

This LVIA demonstrates that the proposed development will have **large adverse effects in the medium term (2-10 years) and medium adverse or large/medium adverse effects in the long term (10-25years).**

The assessment of the effects on the landscape is judged as being significant, although the terminology in LVIA that these are just '*localised impacts only effecting the site and immediate area*' seeks to diminish their severity.

An area of 85 hectares (210 acres) is covered in built development. This makes up a large proportion of the Borehamwood Plateau landscape character area (shown coloured green on following map).

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- LEGEND**
- Site boundary
 - Study area (2km)
- Landscape Character Areas**
- Aldenham Plateau
 - Borehamwood Plateau
 - Bushey Hill Pastures
 - Bushey Swards
 - Elstree Ridge and Slopes
 - High Canons Valleys and Ridges
 - Urban

LD A DESIGN

PROJECT TITLE
HILFIELD SOLAR FARM AND BATTERY STORAGE

DRAWING TITLE
Figure 5: Landscape Character Assessment

ISSUED BY	Oxford	T: 01865 887050
DATE	Nov 2020	DRAWN SG
SCALE @A3	1:25,000	CHECKED WB
STATUS	Final	APPROVED BC

DWG. NO. 7533_005_B

No dimensions are to be scaled from this drawing.
All dimensions are to be checked on site.
Area measurements for indicative purposes only.

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Sources: Ordnance Survey, Hertfordshire County Council



Issues set out in the Claire Browne's Landscape Statement

- Long term effects on the visual characteristics of the landscape extending over large tracts of countryside;
- Undulating nature of the terrain means that the planting mitigation is less effective at screening solar panels in long range views and sometimes impacting on ridgelines;
- Effect on public enjoyment of the Green Belt countryside, where the perceived sense of openness is intrinsic to the experience;
- Panels will be 3m in height above ground, well above eye level;
- Impact of panels on both sides of a footpath route, can channelise views and erode sense of openness even further.



LVIA Viewpoints

The findings of the LVIA are a large scale of changes resulting in significant effects to seven of the twelve viewpoints (Viewpoints 1, 3, 4, 8, 9, 11 and 12). These large scale changes will remain in the long-term to semi-permanent timescale.



Viewpoint 1 – A41 (left) – Existing and Proposed Views



Viewpoint 2 – A41 (left) – Hilfield Lane - Existing and Proposed Views



Existing Photograph (Right)

To be viewed at comfortable arm's length



Photomontage (Right)

To be viewed at comfortable arm's length

Viewpoint 3 – Elstree Aerodrome (right) - Existing and Proposed Views



Viewpoint 9 – Footpath Aldenham A40 - Existing and Proposed Views



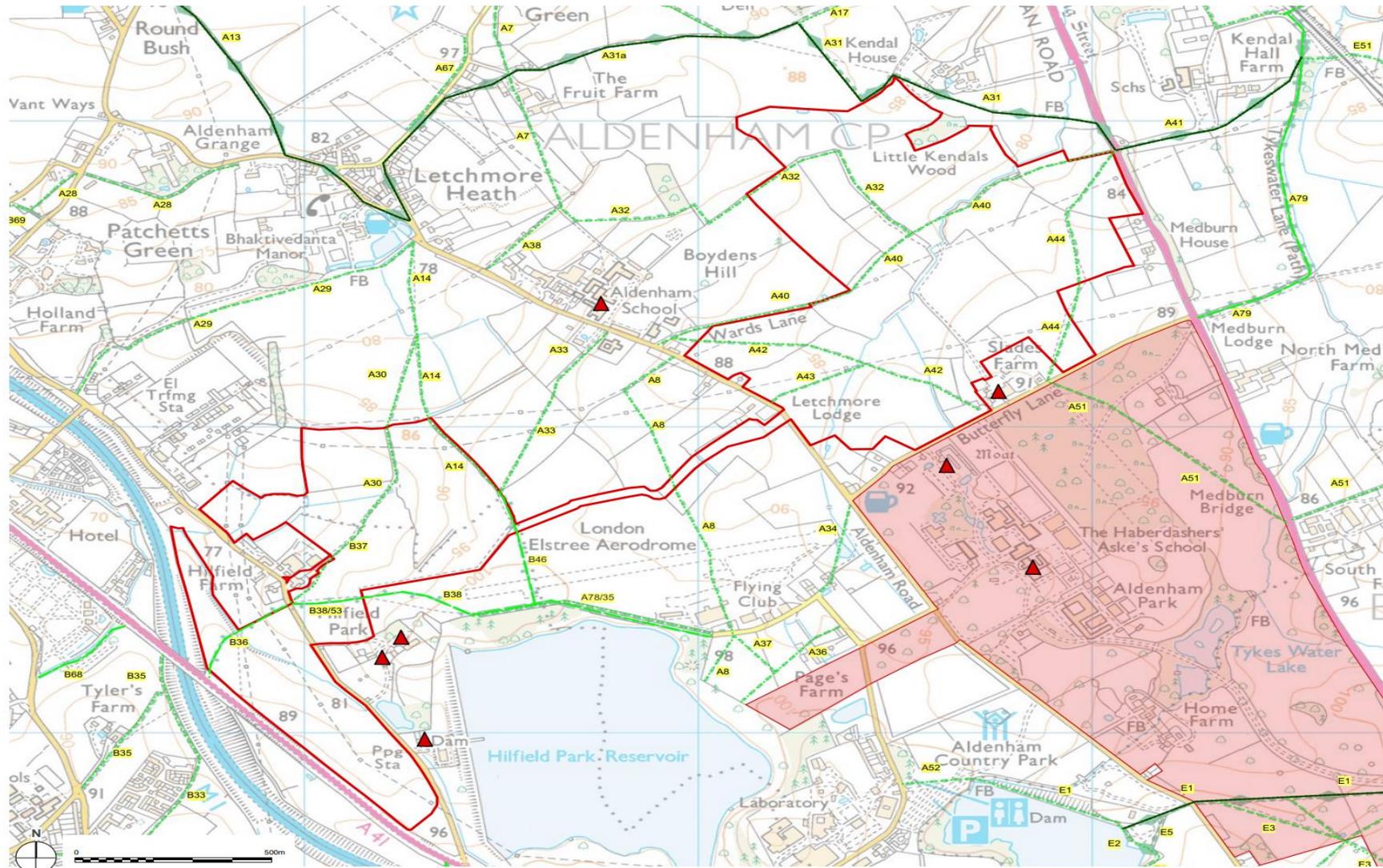
Viewpoint 11 – Footpath Aldenham A40 (left) - Existing and Proposed Views



Impact on public rights of way

- The appeal site is crossed by a high number of public rights of way (PROWs) providing a valuable recreational asset and linking with important environmental and heritage assets.
- Fencing along footpaths, often on both sides would give the feeling of being contained, reducing enjoyment and deterring users.
- Given the location so close to urban settlements of Watford, Bushey, Radlett, Borehamwood and Edgware and the proximity to rural villages these PROWs provide a valuable recreation asset to their populations and are beneficial to the tourism economy of the area.

Plan showing public rights or way and heritage assets



Impact on the rural economy

- The site comprises 130 hectares of agricultural land classified as grade 3b (moderate quality).
- This is a valuable resource, particularly in Hertsmere Borough where there is little grade 1/2 (excellent/good) land.
- The land is capable of producing good yields of cereals and grass and is within a part of the country where this type of farming prevails.
- The Government have stressed the need for the UK to be self-supportive in terms of food production.
- Grazing a few sheep in the fields containing solar panels is no compensation for the huge loss of arable farming land.

Impact on long term character of the area

- The application is initially for a period of 35 years to cover the operational life of the solar equipment used.
- There is no guarantee that the site will be decommissioned at the end of this period. An application could be made to continue the use with new equipment.
- 35 years is itself a considerable period of time and even if not continued there would be considerable pressure for other development to take its place.

Impact on wildlife

- The proposed development does include some benefits in terms of biodiversity including new trees, further landscaping and wildlife meadows.
- There is, however, concern about the impact on larger mammals such as foxes and muntjac deer whose ability to roam would be severely restricted.
- The very small openings shown in the security fencing would appear suitable only for very small mammals.

Impact due to noise

- Noise could have a significant harmful impact on both walkers and wildlife.
- The solar panels are fixed and will not make a noise but the proposed substation and the cooling units required above the battery stores will emit noise.
- The inverter/transformer stations distributed around the fields will probably also emit noise.



Impact on flooding

- The land to the west of Hilfield Lane is subject to potential flooding.
 - The Appellants have so far provided little evidence to show how they can minimise any increase in the risk of flooding.
- 

Lack of consideration of alternative sites

- The Appellant was looking for a site close to a National Grid Substation, which had spare capacity.
- The Appellant's "***starting point had been to avoid the Green Belt***". However, the site selected is within an area which is surrounded by Green Belt, extending over the 5km area of search.
- There were other NG Substations with spare capacity and where development in the Green Belt could have been avoided.



Limited public benefits

The Appellant has listed a number of public benefits, all of which we have refuted:

- Generation of renewable energy;
 - Provision of landscape enhancements;
 - Provision of biodiversity and ecological enhancements;
 - Two new permissive footpaths;
 - Economic benefits of construction and business rates;
 - Educational Strategy for local people and school pupils;
 - Improvements to soil and agricultural land quality;
 - Aiding farm diversification.
- 

Impact on heritage assets

Hertsmere Borough Council's second reason for refusing the application alleges 'less than substantial harm' to five designated heritage assets.

- Slade's Farmhouse (listed building, grade II);
- Hilfield Castle (listed building, grade II*);
- Hilfield Lodge (listed building, grade II);
- Aldenham House (Registered Park and Garden, (grade II); and
- Penne's Place (Ancient Monument).

Impact on heritage assets

- The Appellant also recognises that there will be ‘less than substantial harm’ to three of these assets – Hilfield Castle, Hilfield Castle Lodge and Slades Farmhouse.
- Dr Jonathan Edis, Heritage Director, HCUK Group has provided a Heritage Statement in relation to all of the heritage assets referred to in the reason for refusal but concentrates on those where there is some agreement with the Appellant.
- It is the level of harm (high, medium or low) within the description of ‘less than substantial’ where the differences between the Appellant and ourselves lie.

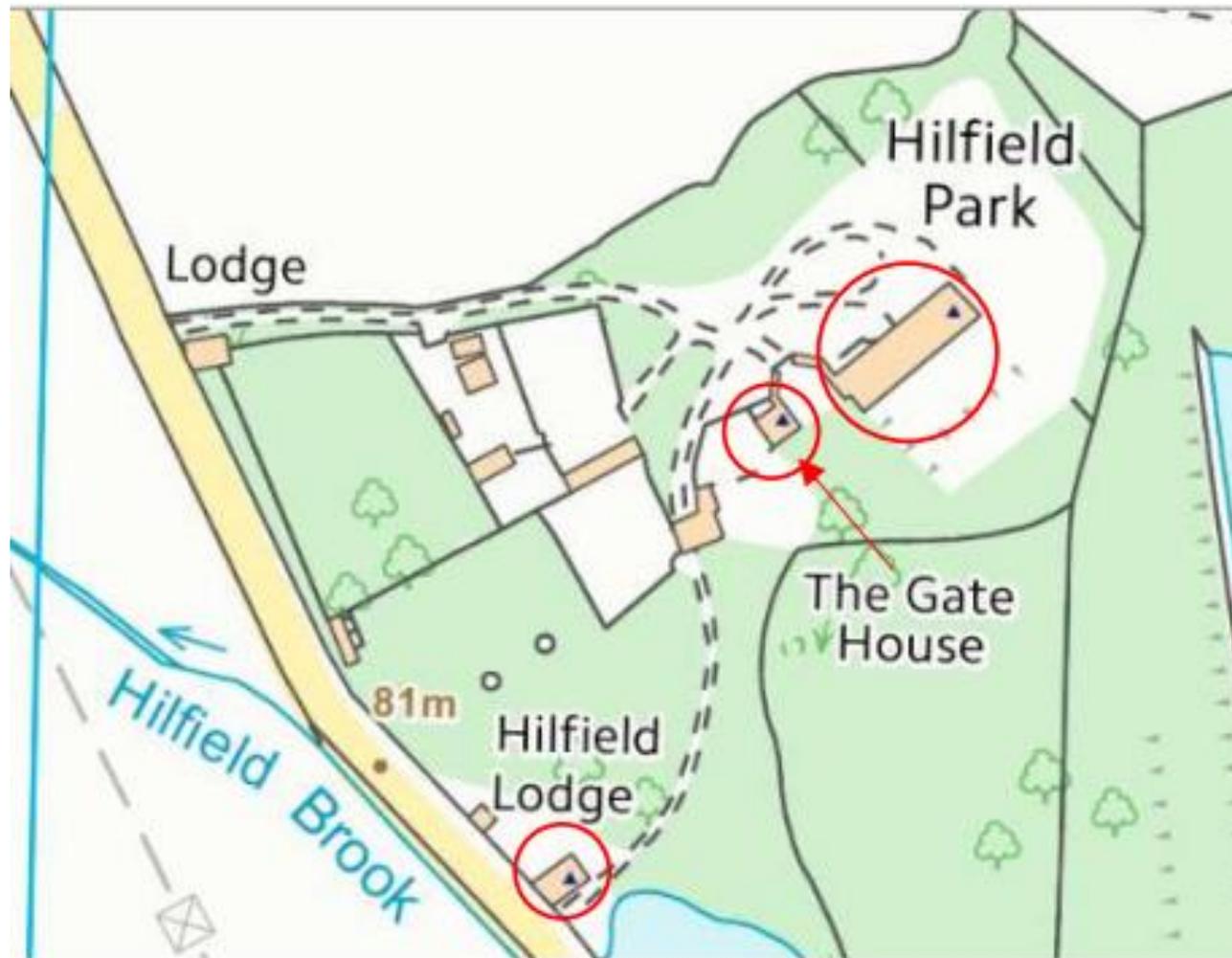
Hilfield Castle Group

The Hilfield Castle Group includes the Castle (grade II*), the Lodge (grade II) and also Hilfield Castle Gatehouse (separately listed grade II).

Hilfield Castle Group was built by architect, Jeffry Wyatt for the Hon George Villiers, brother of the Earl of Clarendon, circa 1798-99.

Taken together, these three listed buildings are of considerable heritage significance.

They were located in a commanding position, within an estate that extended some 750m north-westward to a point near the Elstree Substation.



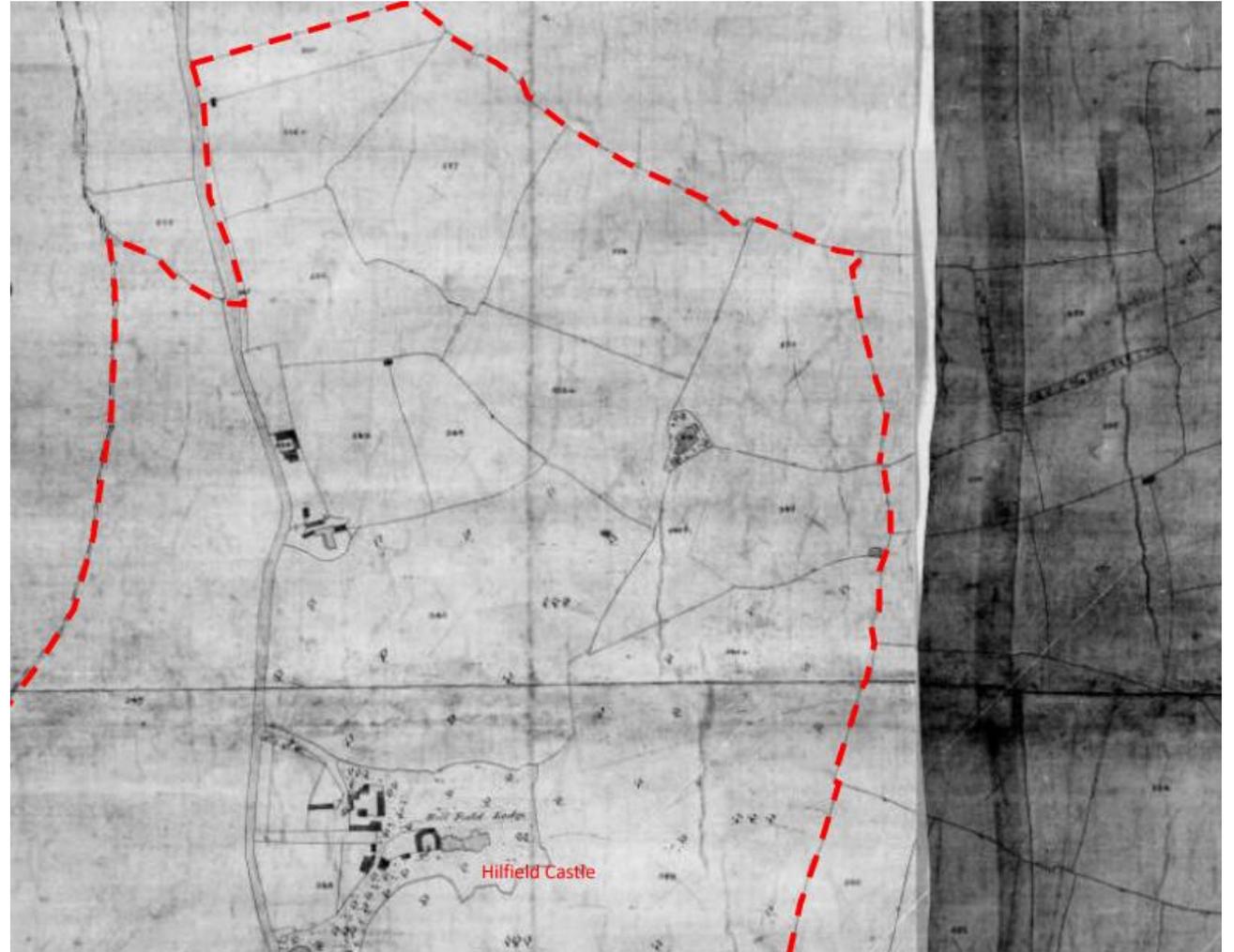
Hilfield Castle c. 1890



Hilfield Castle Group

This plan is an extract from the tithe map of Aldenham, dated 1839. It shows the extent of the estate.

The estate has since been broken up and the former parkland and the setting of Hilfield Castle have been effected by a number of interventions, notably Elstree Aerodrome (1940s) and the Elstree Reservoir (c.1953).



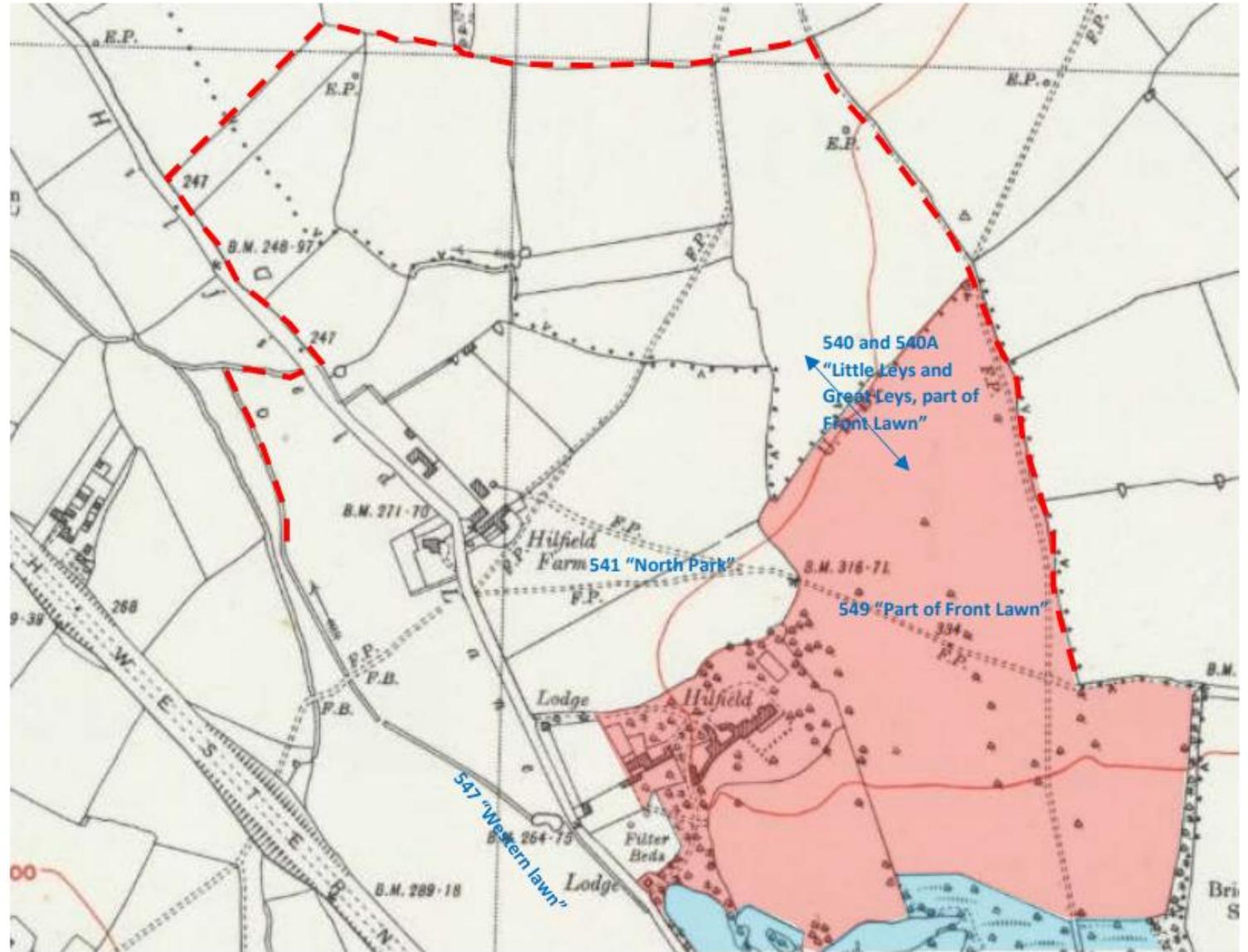
Hilfield Castle

Extract from OS Map 1899

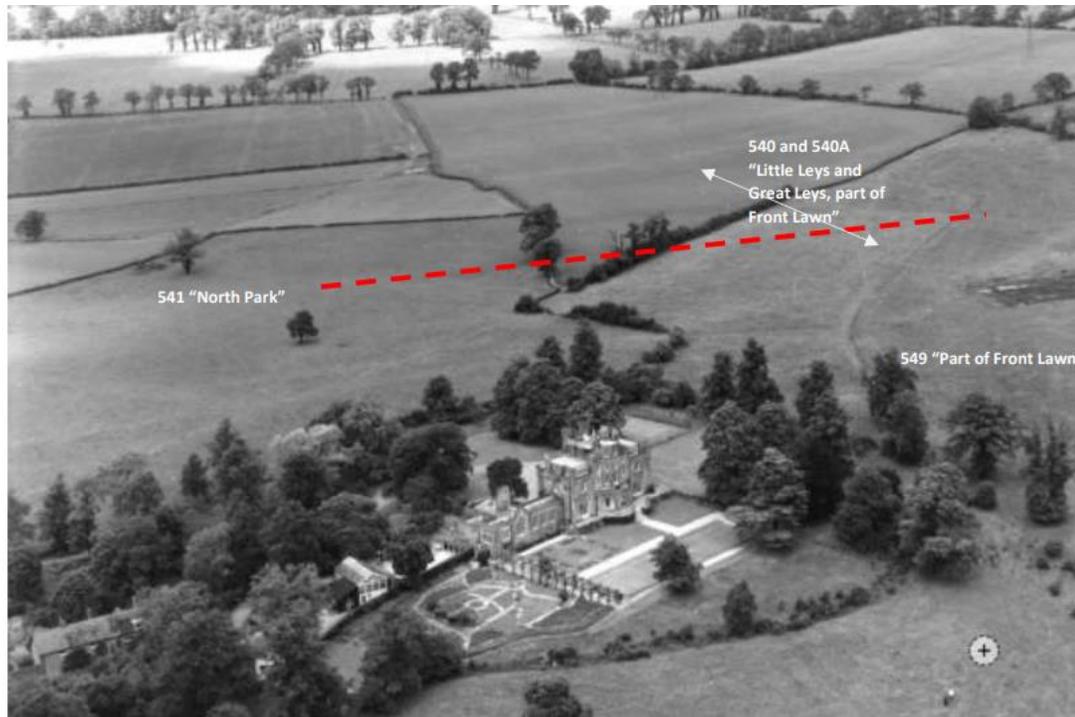
The parkland area of Hilfield castle is shown on this 1899 map by darker grey stippling.



Hilfield Castle – Extract from OS Map of 1946 – the northern boundary of the estate is shown with a red dotted line and the extent of the “park” is shown in pink wash.



Hilfield Castle seen from the south in 1949. The red dotted line on the aerial photograph shows the closest edge of the solar farm and demonstrates the significant effect that this would have on its setting.



Impact on setting of the Hilfield Castle Group

- The Hilfield Castle Group is the most affected of the heritage assets. It is the highest graded (grade II*), the most architecturally and historically significant group where there will be noticeable effects.
- The solar farm will be placed over much of the north-western part of the former Hilfield Castle estate, and it will cover the front parts of the Front Lawn and Western Lawn, wrapping around the north and west sides of the group, and adding to the existing effect of Elstree Aerodrome and Elstree Reservoir.
- The change would give rise to a medium level of 'less than substantial harm' to which great weight must be given in the balancing exercise.

Slade's Farmhouse — Bird's eye view of Slades Farmhouse shown with arrow

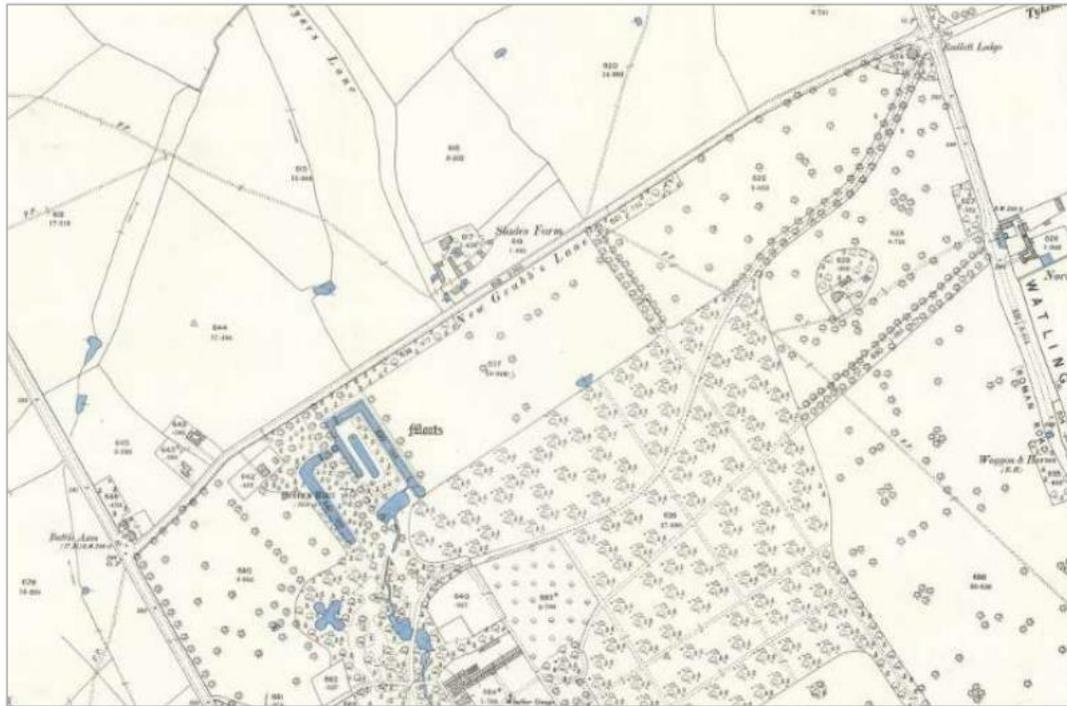


Slade's Farmhouse – Extract from tithe map dated 1839.
The Homestead, now known as Slade's Farmhouse, included agricultural land to the north of the old course of Grubbs Lane.

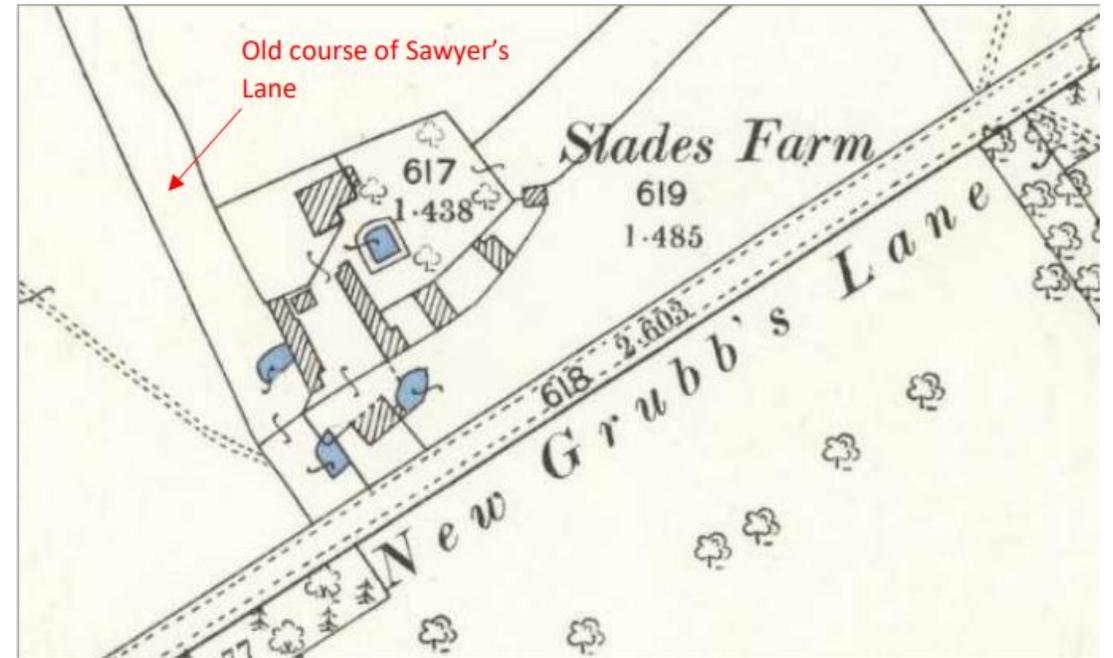


Slades Farmhouse

Extract from OS Map of 1898 – showing alterations to the northern part of Aldenham Park with the creation of New Grubbs Lane (now Butterfly Lane).



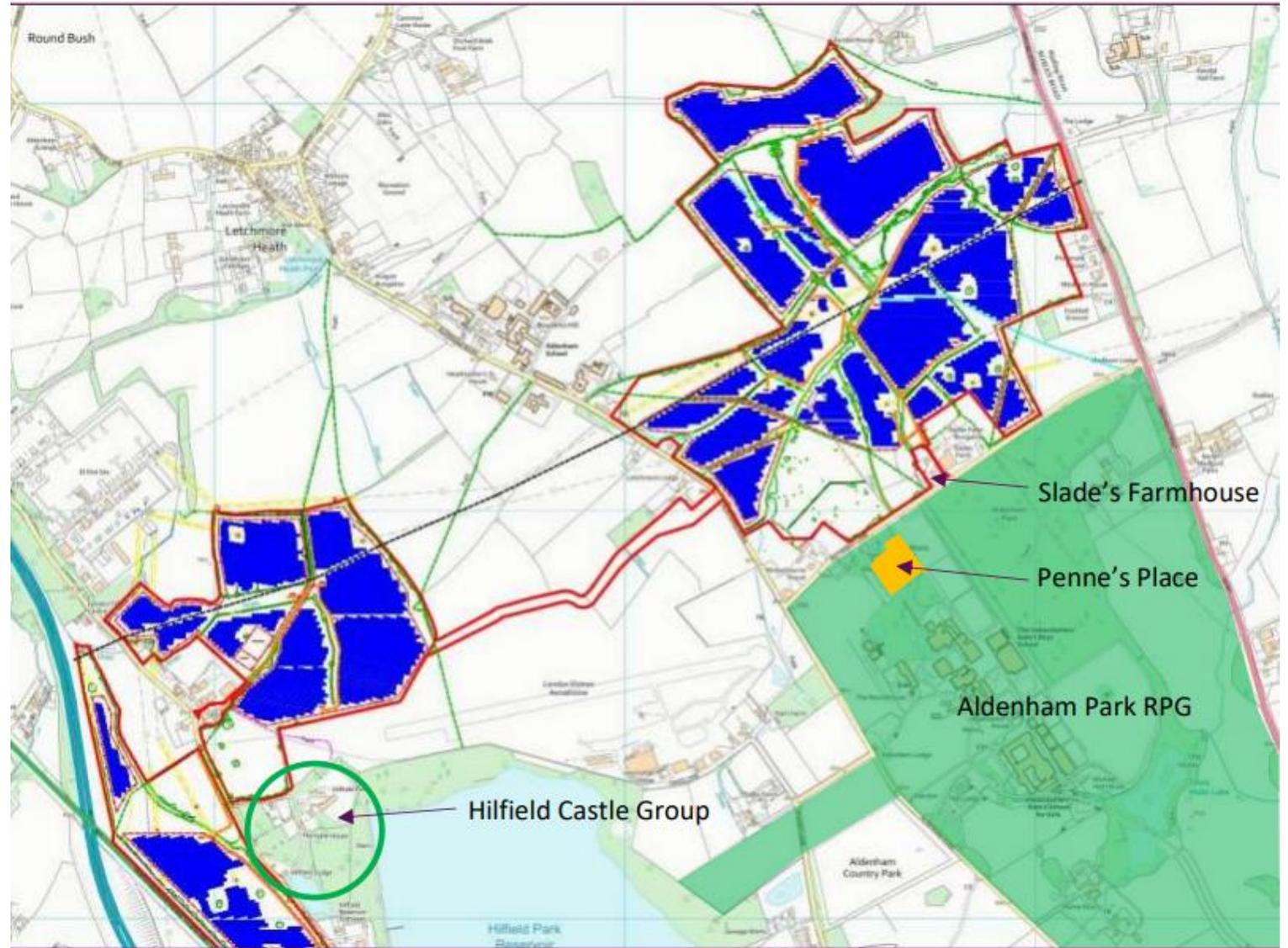
Slade's Farm enlarged showing old course of Sawyer's Lane



Slade's Farmhouse — View of Slades Farmhouse, looking north-east



Map showing size and closeness of the proposed solar farm to Slade's Farmhouse. It also shows Aldenham House Registered Park and Garden and Penne's Place (Ancient Monumnt)

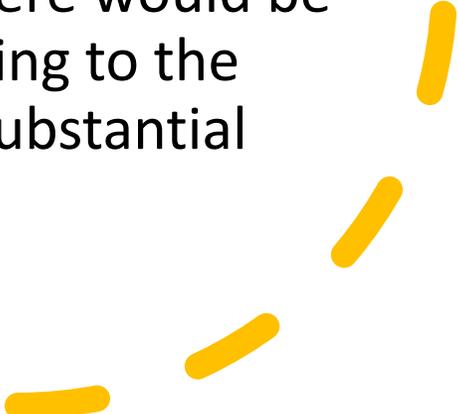


Impact on Slade's Farmhouse

Dr Edis's assessment of the impact on these other heritage assets is as follows:

- Slade's Farmhouse would lose another part of its agricultural setting as a result of the solar array to the north and the north-east. Part of the agricultural setting was lost in c. 1889 by the creation of Butterfly Lane.
- The harm will fall in the medium category of the scale of 'less than substantial harm', which is to say that could be described as significant, noticeable, and material.
- It would have to be regarded as serious to take the long term view of the cumulative harm to the agricultural setting over the past 130 years.

Impact on Aldenham House Registered Park and Garden (RPG)

- Aldenham House RPG is separated from the application site by Butterfly Lane. Some of the solar panels would come close to Butterfly Lane to the east of Slade's Farmhouse, but most of them would be separated from the RPG by some distance.
 - There is also quite dense tree cover in Butterfly Lane and there will be little or no material intervisibility.
 - The visual effect of the proposal on the setting and significance of the RPG will be relatively slight.
 - On this basis, Dr Edis considers that there would be a low level of harm to significance, falling to the bottom end of the scale of 'less than substantial harm'.
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Impact on Penne's Place Ancient Monument

- Penne's Place is visually contained by trees and undergrowth, within the north-west fringe of Aldenham House RPG, and is separated from the application site by Butterfly Lane.
- The nearest solar panel would be some distance away and out of sight.
- Dr Edis does not consider that there would be any visual change to the setting of Penne's Place, such as to give rise to its significance.
- As such he considers that the ancient monument would be unaffected.