

Date: 11 March 2025
Our ref: 502564
Your ref: 24/02455/FP



Shaun Greaves
North Hertfordshire District Council

BY EMAIL ONLY

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Dear Shaun

Planning consultation: Proposed solar farm measuring 35.5 hectares with associated battery storage and ancillary infrastructure

Location: Wymondley Grid Station And To The South Of Sperberry Hill St Ippolyts Hertfordshire

Thank you for your consultation on the above dated 11 Feb 2025, which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

FURTHER INFORMATION REQUIRED TO DETERMINE IMPACTS ON LANDSCAPES

As submitted, the application could have potential significant effects on Landscape. Natural England requires further information in order to determine the significance of these impacts and the scope for mitigation.

The following information is required:

- Updates to the Landscape Visual Impact Assessment (LVIA)

Without this information, Natural England may need to object to the proposal.

Please re-consult Natural England once this information has been obtained.

Natural England's further advice on designated sites/landscapes and advice on other issues is set out below.

This letter should be read in conjunction with Natural England's previous response dated 20 November 2024 (reference: 493362).

Chilterns National Landscape

Natural England previously requested further analysis of the effects of the proposed development on the integrity of the Chilterns National Landscape and its setting. Attention was drawn to the proposed boundary extension and the Levelling up and Regeneration Act 2023.

We would like to reiterate that the Chilterns Boundary review is ongoing and that the project falls within the Area of search. As such we would again like to draw your attention to the below paragraphs to inform any decisions based on Landscape impacts:

The proposed development is located partly within/ within a proposed area of search which Natural England is considering as a possible boundary variation to the Chilterns Area of Outstanding Natural Beauty (AONB, known as National Landscape). Whilst this assessment process does not confer any additional planning protection, the impact of the proposal on the natural beauty of this area may be a material consideration in the determination of the proposal. Natural England considers the Chilterns to be a valued landscape in line with paragraph 187 of the National Planning Policy Framework (NPPF). Furthermore, paragraph 189 of the NPPF states that development in the settings of AONBs should be sensitively located and designed to avoid or minimise impacts on the designated areas. An assessment of the landscape and visual impacts of the proposal on this area should therefore be undertaken, with opportunities taken to avoid or minimise impacts on the landscape and secure enhancement opportunities. Any development should reflect or enhance the intrinsic character and natural beauty of the area and be in line with relevant development plan policies.

An extension to an existing AONB is formally designated once a variation Order, made by Natural England, is confirmed by the Defra Secretary of State. Following the issuing of the designation Order by Natural England, but prior to confirmation by the Secretary of State, any area that is subject to a variation Order would carry great weight as a material consideration in planning decisions.

We would like to again reiterate that under, [Section 245](#) (Protected Landscapes) of the Levelling Up and Regeneration Act 2023 a duty is placed on relevant authorities to seek to further the statutory purposes of the area in carrying out their functions in relation to, or so as to affect, land in an AONB. We therefore require further assessment of the proposed scheme taking into account its location within the setting of the national landscape.

The submitted ZTV and viewpoint photographs within the LVIA indicate that the proposed solar farm in its current form would be highly visible from areas under consideration for designation.

We note that previous refusal of application 22/00709/FP was due to a presumption against unacceptable development in the Greenbelt and associated conflict with Local Plan policies NE2 and NE12 which seek to avoid unacceptable harm to landscape character and appearance. With this in mind we concur with the views of the Landscape consultant at Place Services which raise concerns that the local landscape cannot successfully accommodate development of this type and scale.

It is acknowledged that amendments to the landscape proposals following refusal of application 22/00709/FP include additional woodland planting to the north and new grassland areas, and changes to access tracks and layout of parcels with a 9% reduction in panels. Whilst this is welcomed, we strongly advise that these changes would not be sufficiently effective in mitigating landscape and visual impacts to make the scheme compliant with Local Plan policies NE2 and NE12.

We also note that, under further assessment, the LVIA has not assessed impacts to all LCAs identified within the study area. All LCAs within the study area are within the scope of the LVIA study for assessment of visual and landscape effects and an assessment should therefore be made of these areas where long-distance views would be available to the proposed development. Of

particular concern would be views from areas of elevated ground with extensive views over the surrounding rural landscape. A solar farm would introduce noticeable and detrimental changes in views from such locations which coincide with sensitive visual receptor routes, such as the Chilterns Way. We note that the LVIA has not assessed the impact to the landscape character of elevated areas to the south-west, despite them being within the scope of the LVIA study. With this in mind, we strongly agree with the following comments from Places Services on the LVIA:

“Other LCAs should also have been assessed considering the available long-distance views from the surrounding landscape, for example from the Chilterns Way in LCA 210 ‘Langley Scarp’. We would also have expected an assessment of the impacts on the landscape character of the ‘site and surrounding context’. Given the scale of the proposed development, we would anticipate that the overall effects would have been significant.”

If minded for approval, Natural England have set out our concerns about this development above, and we strongly advise that the assessment of landscape and visual effects from further viewpoints on the Chilterns Way and to LCA Langley Scarp and other LCAs within the geographical scope of the study have not yet been assessed and carried out, to inform the determination of this application. We note that consultation with the Chilterns National Landscape has been undertaken and we would strongly encourage you to take account of advice that they give.

There may be scope for amendments to the location and/or design of the proposals that could avoid or mitigate the environmental harm described above, including:

- An updated LVIA taking account of all LCAs and viewpoints as described above
- Seeking more suitable alternative sites outside of the setting of the National Landscape/AONB

For advice on other natural environment matters please refer to our previous response (tracker no: 493362).

Should the applicant wish to discuss the further information required and scope for mitigation with Natural England, we would be happy to provide advice through our [Discretionary Advice Service](#).

Please consult us again once the information requested above, has been provided.

Yours sincerely

Betsy Brown
Sustainable Development Higher Officer – West Anglia Team