



North Hertfordshire District Council
Gernon Road
Letchworth Garden City
Hertfordshire
SG6 3JF

14/02/2025

Dear Naomi Reynard,

Ref: **24/02889/FP - Land At Roundwood, Back Lane, Graveley, Hertfordshire.**

Thank you for consulting us on the Full Planning Permission: Residential development of 281 dwellings and associated roads, parking, realignment of Back Lane, drainage, landscaping, open space, servicing facilities and associated works.

This review is based on a desktop study and site visit undertaken on 30th January 2025, of the above-named application.

Site Context

The application site is located within the countryside between Hitchin to the north-west and Stevenage to the south-east. The Site itself is located to the south of Sperberry Hill road, with Little Almshoe Lane running through the Site. It comprises 3no. arable farmland fields and a number of PRoWs (no. 14, 15, 16 including Hertfordshire Way. National Grid Wymondley Substation is located directly to the north of the site, on the opposite side of Sperberry Hill.

We note that this application is a resubmission of refused application 22/00709/FP, the '2023 Scheme'. The second reason for refusal was for unacceptable harm to the character and appearance of the surrounding area (Policies NE2 and NE12). Amendments to the Landscape Proposals include [inter alia] rearrangement of access tracks and layout of panels, additional woodland planting to the north and new grassland areas, with a 9% reduction in panels.

Policy Context

North Hertfordshire Local Plan (Adopted 2022)

- *Policy NE12: Renewable and low carbon energy development*

Other policies to be considered relevant to landscape include Policy ENV3, ENV5, NE1, NE2 and SP12.

Wymondley Parish Neighbourhood Plan (Made 2019)

The eastern extent of the site is located within Wymondley Parish and is therefore subject to the Neighbourhood Plan.

- *Policy NHE1 Landscape Character*
- *Policy NHE4 Green Infrastructure*
- *Policy NHE7 Lighting*
- *Policy NHE8 Landscaping Schemes*

Review of Submitted Information

The application has been supported by the submission of a Landscape and Visual Impact Assessment (LVIA) produced by Axis. The assessment broadly follows the Guidelines for Landscape and Visual Impact Assessment (GLVIA3) and assessed sensitivity (value and susceptibility) magnitude of change and overall effects. Viewpoint photography was undertaken in September 2021 when there was full leaf cover, and therefore does not represent the worst-case scenario. However, Limitations (Para 3.5.1) state that *“Where relevant to its conclusions, the LVIA makes assumptions as to the likely visibility of the Resubmission Scheme in winter when vegetation is not in leaf”*.

We note the minor error within the Methodology (Table 2.1) that states that both columns are ‘higher’ value.

Landscape Character

The North Hertfordshire and Stevenage Landscape Character Assessment (2011) identifies the site as being located in Area [215](#) ‘Wymondley and Titmore Green’ and Area [214](#) ‘Langley Valley’. Key characteristics of these LCAs which are relevant to the site include; large scale rolling landform, arable land use, well-trimmed hedgerows, remnant mature trees including stag headed trees, large number of scattered detracting features and winding lanes. Wymondley transformer station and associated distributor pylons are notable detracting features. The Hertfordshire Way long distance footpath crosses on a broadly north-south axis. Other footpaths cross and connect local settlements. The condition of LCA 215 (comprising most of the site) is moderate and the robustness is moderate.

Appendix 3 ‘Effects on Landscape Character’ judges that LCA 215 has **medium-low susceptibility** and **medium-low value**, resulting in **medium-low sensitivity**.

Whilst the rolling arable landscape may be locally valued, we accept that this landscape is not formally designated as valued.

The magnitude of change is judged to be **medium** in the short-term, resulting in a **moderate adverse** short-term effect. A large portion of the remaining arable landscape within this LCA is impacted by the proposed development, also considering that the scale of the LCA is relatively small.

We note the assessment states that (Para 7.1.6) *“the local landscape is already influenced by peri-urban land uses and energy infrastructure”*. However, the substation is largely contained to the north by surrounding vegetation and the landform, and the pylons do not affect the ground level arable landscape that is still perceptible from many locations. Pylons are also a common feature within open arable farmland landscapes. We therefore judged that whilst these features do influence the character, that the proposed solar farm and battery storage will have a far greater magnitude of change on the character of this landscape owed to its scale and visibility and disruption of the current land use.

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.

Policy NE2 (Landscape) of the North Herts Local Plan states that development must not *“cause unacceptable harm to the character and appearance of the surrounding area or the landscape character area”*, taking into account mitigation. We judge that the proposed development would cause adverse harm during operation, and would be considered ‘significant’ (moderate adverse).

Visual Amenity

We welcome the inclusion of Type 4 Photomontages for Viewpoints 3, 7, 8 and 10.

We judge that there are some omitted viewpoint receptors which should have been included within the submitted assessment.



Figure 1: View east from Little Almshole Lane

As shown in Figure 1, views across the eastern parcels of the application site are viewed from Little Almshole Lane. Cars would likely be travelling slower through these quieter lanes, and are also presented with a view straight on as opposed to passing the view to the side.



Figure 2: PRow 16 Wymondley

Almost 360-degree views are available of the application site from PRow 16 Wymondley, which runs through the centre of the site. We would have expected this receptor to have been included within the assessment, given that it will be surrounded by solar panels. Solar panels on both sides of this PRow may also appear overbearing, given that the land rises on both sides of the route and will therefore increase the sense of enclosure from this location.

A site visit (31/01/2025) found that in most instances, we agree that (Para 4.4.3) *“there would not be visibility of the Site from the north as a result of the Site’s location across south-facing slopes, but also as a result of the pattern of vegetation close to the Site boundary”*.

Views from Sperberry Hill across the development site are panoramic in places with some large sections of missing hedgerow that create an open feel to the road. Only one viewpoint (Viewpoint 2) is used to represent the extent of these very open and panoramic views.

Viewpoint 2 shows long-distance views across the countryside valley, where the introduction of solar panels would obscure this view. The magnitude of change is judged as **large** in the short-term, and **small** in the medium/long-term. The LVIA states that *“In the medium-and long term the proposed mitigation planting would screen the Proposed Development and whilst the introduction of a hedgerow would also curtail views south, it would be consistent with the character of views along Sperberry Hill road. The visual impact would therefore reduce to small.”*

Whilst we recognise that sections of Sperberry Hill road are already defined by hedgerows and planting this edge would not be out of character, the occasional views south would be lost, and we judge that the **medium/long-term** magnitude of change judgements are too low. The effect is therefore judged as **minor adverse** over this time frame, which we judge is also too low.

We question whether a set-back distance similar to the approach used towards the east of the site would also be appropriate along other sections of Sperberry Hill, in order to retain views across the valley.

We also note that the susceptibility of **Viewpoint 2** is assessed from road users, therefore decreasing the susceptibility judged. However, we note that several similar views are also obtained from pedestrians and recreational users from PRowWs that join Sperberry Hill from the north, notably from PRow Ippolyts 17 (Figure 1 and 2).



Figure 3: End of PRow 17 Ippolyts

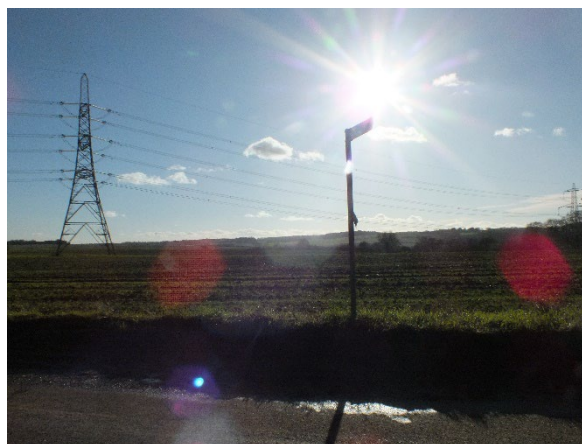


Figure 4: View across valley from PRow Ippolyts 17

As represented by **Viewpoint 3** and associated Type 4 montages, the retained PRow Wymondley 014 will be defined by two hedgerows visually screening the adjacent security fencing and solar panels. Clarification is required on the proposed distance (In metres) between hedgerows, to ensure that whilst these are establishing, the experience for users of the PRow is not too restrictive or enclosing.

Viewpoint 4 represents views from Tittendell Lane on the western boundary of the site. Although not clear from the included viewpoint photography, the lane is sunken below the adjacent field in places (Figure 5) and therefore the introduction of solar panels close to the boundary may feel overbearing. We therefore advise that solar panels are set back from this boundary.



Figure 5: Tittendell Lane

Views from PRowWs on lower elevation land, such as from Viewpoints 7 and 10, can be well mitigated owed to the proposed hedgerows appearing in-keeping with the surrounding field pattern and vegetation, and also having some physical separation from the affected PRowW.

Viewpoint 8 from the Hertfordshire Way is judged as a **medium** sensitivity, which we judge to be too low considering the open views from a recognised long-distance walking trail. We judge that this location constitutes **high** susceptibility, since users are likely to be specifically there to enjoy the Hertfordshire landscapes. Whilst pylons are observed on the horizon, the main focus is the undulating countryside landform which is impacted by the proposed development. Pylons are also a common feature of countryside landscapes, whereas solar farms and battery storage facilities are not. We do however agree that the magnitude of change does not decrease over time, as has been represented within the submitted judgements. We agree that there would be **major-moderate adverse** effects in the short term which does not decrease in the medium/long term.

Viewpoint 9 is from the Hertfordshire Way from within the site, with views north towards the rising landform. The proposed solar panels are likely to completely obscure this view, which will not change in the medium/long term, despite being filtered by screening planting which will soften the industrial features. We therefore judge that the magnitude of change would not reduce to **small to medium**, since the open character observed to the north would be impacted. We therefore judge that in the medium/long term, the overall effect would only reduce down to **moderate adverse**.

Overall there is some difference in judgement in our assessment of the anticipated effects for a number of receptors. We note that there may be other visual receptors where there may also be a difference in judgement.

We judge that significant impacts would remain in a number of locations surrounding the site, and adverse impacts remain from a range of mid and long distances, particularly noting the undulating landscape that allows strong countryside views from the Hertfordshire Way to be impacted by the proposals. Some of these more distant views are unable to be mitigated, owed to the landform and availability of views.

Review of Proposals

All existing hedgerows and boundary vegetation has been proposed for retention as part of the scheme, with a 6m buffer allowed to the proposed boundary fencing.

The removal of solar panels from the south-east of the Hertfordshire Way is preferable, reducing the sense of enclosure and limiting external views from this long-distance walking route.

Similarly to the west of the scheme, we advise that solar panels are set back from Sperberry Hill to allow views over the valleyside and therefore retain some of the undulating arable farmland character that is locally valuable. This will require reducing the quantity of panels to allow for these views to be retained. Whilst the alternative mitigation measures proposed of planting up the hedgerow to Sperberry Hill is not necessarily out of character, it impacts on other important characteristics which include the views of the 'large scale rolling landform'.

We also advise that solar panels are set back from PRow 16 Wymondley, which runs through the centre of the site. Solar panels are located on both sides of the PRow which will increase the sense of enclosure from this location. The raise in elevation on both sides will unfortunately restrict views on both sides in combination with the solar panels, so therefore we advise there is a larger set back distance.

We also note the proposed SuDS basins to the north of PRow 16 Wymondley. The basin is proposed on higher ground and also on the sloping valley towards the ditch and therefore we question whether this is the most appropriate location.

Owing to the sunken nature of Tittendell Lane, we also advise a wider set back distance is proposed for the solar panels.

Hedgerow enhancements will be required along Sperberry Hill, Little Almshole Lane and Tittendell Lane.

Summary

The submitted proposal has improved upon the scheme under 22/00709/FP, however owed to a number of visual and character constraints, the impacts assessed within the proposed scheme are difficult to successfully mitigate, considering the extent of available viewpoints across the rolling countryside landscape that will be affected.

Significant effects are likely to remain, with both the landscape character and visual receptors experiencing these effects from within and close to the site. Some mitigation measures are also not beneficial, such as visually obstructive hedgerow planting which removed the long-distance views across the valley. The views are unlikely to be re-established following decommissioning as this would require removing vegetation.

Overall, we have concerns regarding whether the proposed application could be successfully accommodated within this landscape.

We note that the proposed landscape enhancements may contribute to some beneficial effects to individual landscape features (i.e. hedgerows).

If minded for approval, we have highlighted our concerns with the proposal in its current form.

If you have any queries relating to the above, please do not hesitate to ask me.

Yours sincerely,

Megan Cowell BA (Hons) MA
Landscape Consultant

Dominic Fitzsimmons, BA (Hons) MLA CMLI
Principal Landscape Consultant