

Ben Glover

North Herts Council
Development and Conservation
North Hertfordshire District Council
PO Box 10613
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17 October 2025

Dear Mr Glover,

Response to consultation comments from Places Services
25/01947/FP: Full Planning Permission: Battery Energy Storage
System (BESS), ground mounted solar farm, associated
infrastructure, access and landscaping
Land South Of A507 Near Cumberlow Green, Clothall Road,
Clothall, Hertfordshire

Thank you for providing us with Place Services letter of 26 September 2025 ref 08372 setting out the Council's response regarding the Landscape and Visual Chapter of the ES.

We are pleased to note that you are broadly satisfied with the approach taken. However, as a number of the points raised are general in nature, we ask for clarification on the following in order to address them properly:

1. Landscape Character

The LPA requests that LCAs Weston–Green End Plateau (222) and Upper Beane Valley Tributaries (221) be scoped in. These LCAs are already included within our assessment (see para. 7.4.15 and 7.4.16 and LVA Figure 4). We have not assessed the LCAs in isolation, however, but as part of the Study Area as a whole, which provides a balance between attributing influence on the areas beyond the study area and assessing the relevant part of the LCA within it. The table attached to this letter as Appendix1 demonstrates that our integrated assessment method produces equivalent outcomes to an assessment of the LCAs individually. Accordingly, we would not propose to amend our conclusions at this stage.

2. Visual Effects Assessment

Although you have commented that not all mid- to long-distance viewpoints requested have been included, and that the request for these viewpoints “remains extant”. We have implemented all viewpoint recommendations contained within your previous correspondence (attached). Please could you specify **which specific additional viewpoints** are required and confirm how you would like us to address this.

Regarding para. 7.6.23 (pylons imparting an “urbanising influence” on the landscape), the point our report makes infers that pylons are not a rural feature and are at odds with typical rural landscape character, but as they are part of the baseline, a dominant non-rural influence is present in this location. We note that the word “urbanising” in this context has the same connotation as “industrialising”.

We note your reference to differences in professional judgement. We would welcome clarification of any specific receptors, viewpoints, or assessment stages where the LPA considers our judgements to diverge from GLVIA3 guidance, so that we may respond appropriately.

You have commented that adverse impacts remain from a range of mid- and long-distance views; however, please could you clarify **which views** these are and confirm how you would like us to address this matter.

3. Review of Proposals

We are pleased to note that you are broadly satisfied with the proposed scheme revisions, including the omission of Fields 1, 2, 11, and 16 from PV panel areas.

Regarding your remaining concerns regarding Field 3 and views from the A507, please could you confirm if you would need additional information?

4. Requested Visualisations

We are happy to provide the five visualisations as requested (locations shown on the attached Viewpoint plans), namely:

- Viewpoint 5: BOAT Clothall BY012:
 - o Existing Winter Photography
 - o Photomontage, Winter Year 1
- Viewpoint 5a: BOAT Clothall BY012 (new viewpoint location as requested by LPA)
 - o Existing Summer Photography
 - o Photomontage Summer Year 15
- Viewpoint 7: A507:
 - o Existing Winter Photography
 - o Photomontage Winter Year 1

- Viewpoint 7a: A507: (new viewpoint location as requested by LPA)
 - o Existing Summer Photography
 - o Photomontage Summer Year 15
- Viewpoint 20: Restricted Byway HD|Clothall|021
 - o Existing Winter Photography
 - o Photomontage Winter Year 1
 - o Existing Summer Photography
 - o Photomontage Summer Year 15
- Viewpoint 22: Footpath HD|Clothall|020 (no existing winter photography available)
 - o Existing Summer Photography
 - o Photomontage Summer Year 15
- Viewpoint 24: Footpath HD|Clothall|019 (no existing winter photography available)
 - o Existing Summer Photography
 - o Photomontage Summer Year 15

However, this is fewer than the number of visualisations previously requested in your email as attached, and your current consultation letter also suggests that further viewpoints may still be required. Before we commission the visualisations, please could you confirm a final agreed list of required viewpoints.

Next steps:

Summary of requests for clarification:

1. Clarification of the LPA's assessment of magnitude of change and identification of any receptors or views where our assessment is considered materially deficient.
2. The specific additional mid- to long-distance viewpoints that remain outstanding.
3. The final confirmed list of visualisations required to discharge this consultation.

We would be pleased to discuss these matters further at a meeting should the LPA and Place Services consider this helpful for clarification.

Yours sincerely,



David Bolt
Landscape Technical Director

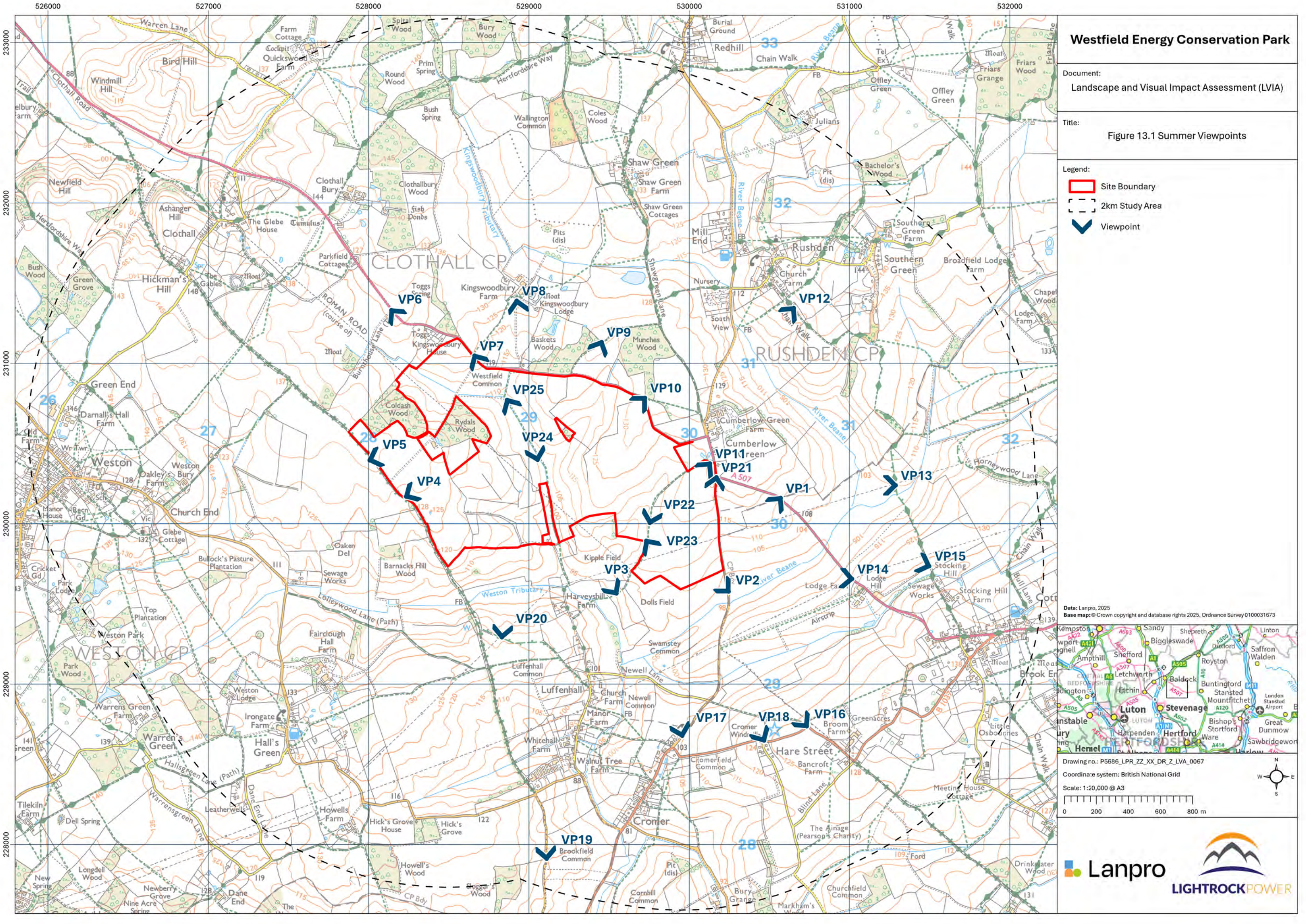


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Appendix 1 - Table 1, Westfield Solar Lanpro LCA assessment method equivalent outcomes of Published LCAs

		Effects (From LVIA)		
		Construction	Year 1	Year 15
Site	Landscape Fabric	Moderate to Minor Adverse	Moderate Adverse Significant	Minor Beneficial
	Landscape Character	It is acknowledged that there would be there would be an immediate change to the character of the Site itself and its immediate surroundings as it changes from an area of arable farmland to solar infrastructure. This change would exist in entirety within the lifetime of the Scheme at the site level. This harm is included within the identification of effects on the Local Landscape. However, the introduction of the solar arrays and other associated infrastructure would not become a defining feature on the local or wider landscape once operational (e.g. at year 1 and year 15). Given the substantial quantum of landscape planting associated with the proposals, the acknowledged significant adverse effects at year 1 would be reduced by the embedded mitigation planting to non-significant beneficial by year 15.		
Local Landscape	Upper Beane Valley Tributaries	Moderate to Minor Adverse	Moderate Adverse Significant	Moderate to Minor Adverse
	Weston Green End Plateau	Moderate to Minor Adverse	Moderate Adverse Significant	Moderate to Minor Adverse
Wider Landscape	Ardley / Cottered Settle	Minor to Negligible Neutral	Minor to Negligible Neutral	Minor to Negligible Neutral
	Baldock Gap	Minor to Negligible Neutral	Minor to Negligible Neutral	Minor to Negligible Neutral
	Beane Valley	Minor to Negligible Neutral	Minor to Negligible Neutral	Minor to Negligible Neutral
	Cherry Green Arable Plateau	Minor to Negligible Neutral	Minor to Negligible Neutral	Minor to Negligible Neutral
	North Baldock Chalk Uplands	Minor to Negligible Neutral	Minor to Negligible Neutral	Minor to Negligible Neutral
	Wellington Scarp Slopes	Minor to Negligible Neutral	Minor to Negligible Neutral	Minor to Negligible Neutral
	Western Plateau Parklands	Minor to Negligible Neutral	Minor to Negligible Neutral	Minor to Negligible Neutral



Westfield Energy Conservation Park

Document:
Landscape and Visual Impact Assessment (LVIA)

Title:
Figure 13.1 Summer Viewpoints

- Legend:
- Site Boundary
 - 2km Study Area
 - Viewpoint

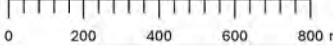
Data: Lanpro, 2025
Base map: © Crown copyright and database rights 2025, Ordnance Survey 0100031673

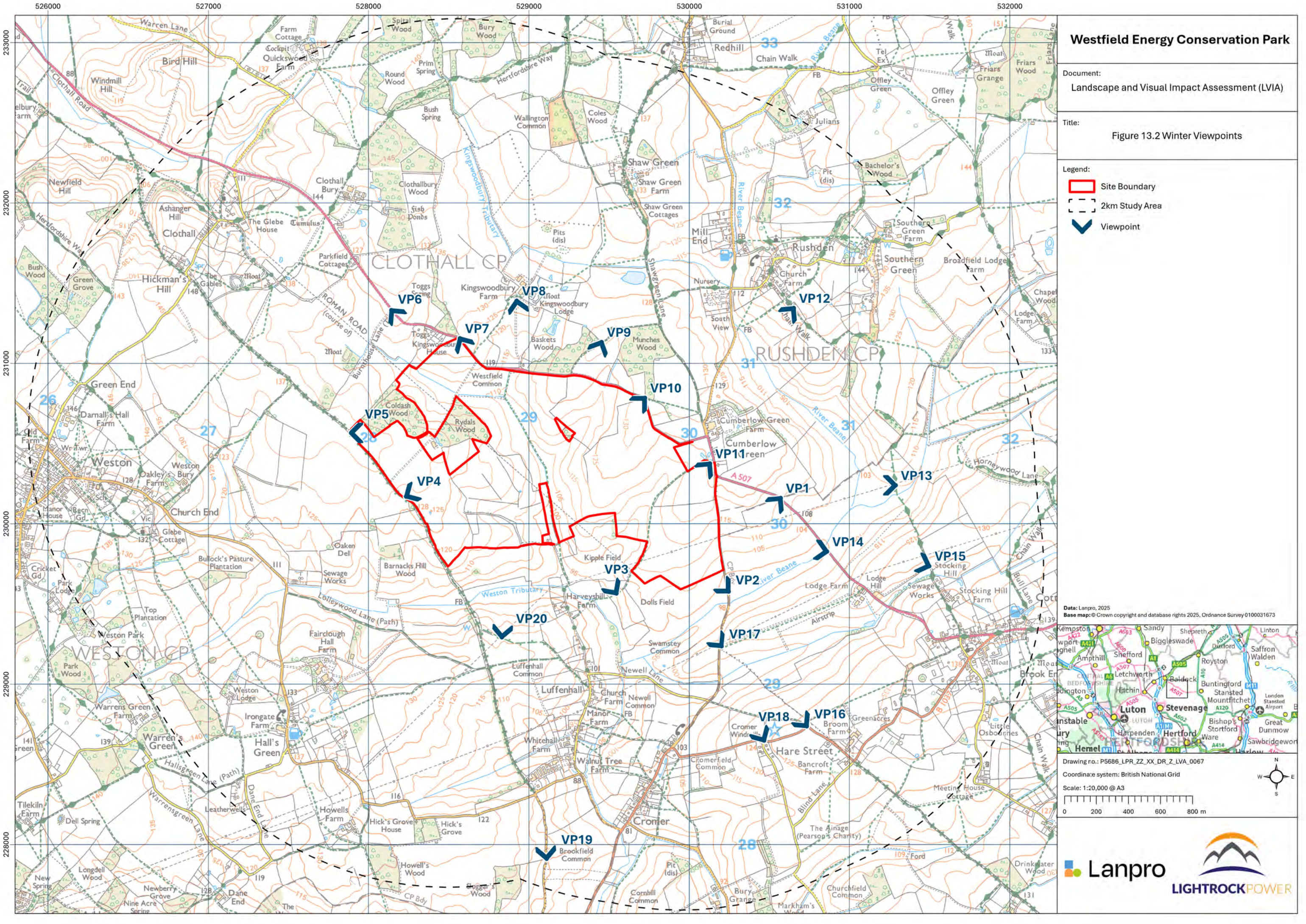


Drawing no.: P5686_LPR_ZZ_XX_DR_Z_LVA_0067

Coordinate system: British National Grid

Scale: 1:20,000 @ A3





Westfield Energy Conservation Park

Document:
Landscape and Visual Impact Assessment (LVIA)

Title:
Figure 13.2 Winter Viewpoints

- Legend:
- ▬ Site Boundary
 - - - 2km Study Area
 - Viewpoint

Data: Lanpro, 2025
Base map: © Crown copyright and database rights 2025, Ordnance Survey 0100031673



Drawing no.: P5686_LPR_ZZ_XX_DR_Z_LVA_0067

Coordinate system: British National Grid

Scale: 1:20,000 @ A3





North Herts Council
Development and Conservation
North Hertfordshire District Council
PO Box 10613
Nottingham
NG6 6DW

Date: 26 September 2025
Our ref: 08372

For the attention of: Ben Glover

Application ref: 25/01947/FP
Location: Land South Of A507 Near Cumberlow Green, Clothall Road, Clothall, Hertfordshire
Proposal/Description: Full Planning Permission: Battery Energy Storage System (BESS), ground mounted solar farm, associated infrastructure, access and landscaping.

Thank you for consulting with Place Services on the above Full planning application. This letter sets out our consultation response on the landscape impact of the application and how the proposal relates and responds to the landscape setting and context of the site.

Site Context:

The site is located to the west of Cumberlow Green village and comprises a large number of arable fields separated by tree, hedgerow and ditch lined boundaries. The undulating farmland site also contains Coldash Wood and Rydals Wood (Ancient Woodlands) and some small copses. The A507 road runs along the northeastern boundary, and a historic byway runs along the southwestern boundary. The northern section of the site is located within the Green Belt.

Planning Policy Context:

Overarching National Policy Statement for Energy

The UK Government's position on power is set out in the Overarching National Policy Statement for Energy (EN-1), which recognises the importance of understanding and addressing landscape and visual impacts (Department of Energy Security & Net Zero, 2023). Of which, Para 4.6.2 states that:

"Applying 'good design' to energy projects should produce sustainable infrastructure sensitive to place, including impacts on heritage, efficient in the use of natural resources, including land-use, and energy used in their construction and operation, matched by an appearance that demonstrates good aesthetic as far as possible. It is acknowledged, however that the nature of energy infrastructure development will often limit the extent to which it can contribute to the enhancement of the quality of the area."



Furthermore, Para 3.5.2 of the National Policy Statement for Renewable Energy Infrastructure (EN-3) (2023) also states “Proposals for renewable energy infrastructure should demonstrate good design, particularly in respect of landscape and visual amenity, opportunities for co-existence/co-location with other marine uses, and in the design of the project to mitigate impacts such as noise and effects on ecology and heritage.”

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.

Landscape and Visual Impact Assessment (LVIA):

We are satisfied with the submitted Methodology included within Appendix 7.3 of the LVIA (Chapter 7 of the Environmental Statement).

Landscape Character

The site is located within (in proximity to) Landscape Character Areas (LCA) Weston – Green End Plateau (no. 222) and the Upper Beane Valley Tributaries (no. 221) of the North Hertfordshire and Stevenage Landscape Character Assessment. We request that these are scoped in/included in the assessment.

Para 7.4.57 judges that the local landscape character is assessed as medium value, medium susceptibility resulting in a medium sensitivity. In combination with the medium magnitude of change, the Year 1 effects are judged as **moderate adverse** overall.

The proposed development comprises a large portion of the valley and the Upper Beane Valley Tributaries LCA. We would judge that the local landscape character would experience a **high magnitude of change**, which would result in a **major-moderate** adverse overall effect. We therefore judge that the judgements have underscored the effects on the local landscape character.

Visual Effects

We previously provided commentary on the Viewpoint Locations through Pre-Application Consultation. The submitted Viewpoint Locations (Figure 13.3 – Summer) have included revisions to the locations and additional viewpoints to reflect some of our previous comments. Where additional viewpoints have not been included based on our advice, these are for viewpoints representing mid- to long-distance views. However additional mid- to long-distance viewpoints have not been included. And our previous request for these remains extant

Para 7.6.23 states that the pylons “*impart an urbanising influence on the character of the local character*”. We disagree with this justification, since pylons are infrequently found in urban areas and the site remains open countryside despite the presence of pylons.

The effects on PRowS 019 and 020 which run through the site are assessed as **major-moderate adverse** at Year 1, reducing the **moderate adverse** at Year 15. We do not disagree with these judgements.

However, the effects on the western BOAT are judged to reduce from **major-moderate adverse** at Year 1 to **moderate-minor adverse** at Year 15. The proposed mitigation includes forming a green lane character (Para 7.7.55) along the Byway Open to all Traffic (BOAT), reducing views of the PV panels. We do have concerns that in turn, the planted vegetation would also obscure the long-distance views across the Beane Valley where the elevated BOAT currently provides open views. We therefore judge that the Year 15 effects have been underscored.

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 is also 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. Some external views are unable to be mitigated owed to the landform and availability of views.

Review of Proposals:

From a visual impact perspective, we welcome the omission of Fields 1, 2, 11 and 16 from the PV panels areas as this reduces the sense of industrialisation along the A507, particularly with the expansive views south-east along the A507. We have concerns regarding the visual impact of Field 3 from the A507, as this would be a major visual detractor within the expansive views of the countryside from this location. There are views beyond of other fields, such as Field 10 and 4, however these are less prominent in the view. There are also longer views across the valley along the A507 looking north-west, where the PV panels would form a major detractor in views of the woodlands and the expansive countryside.

Considering the visibility of the PV panels from a number of surrounding and internal visual receptors and the large scale of the solar farm, we advise that Visualisations are produced to demonstrate the visual impact of the proposals and the effectiveness of the proposed mitigation. Receptors experiencing judged major-moderate adverse (Table 7.5: Summary of Visual Effects) should be accompanied by Type 3 Visualisations, given the scale and impact of the scheme.

Receptors to consider submission of Visualisations include:

- BOAT Clothall BY 012 (Viewpoint 5): Long-distance views of the rolling arable countryside across Beane Valley are a notable feature within this landscape and form part of the Weston Golden Jubilee Walk. We have concerns that the proposed PV panels, fencing and Native Species Shrub Planting would obstruct views from the BOAT across the countryside and detract from the experience of users along this PRow.

- A507 (Viewpoint 7): Expansive and characteristic views are obtained from the A507 driving south-east. We have some concerns regarding the visual impact of Field 3 from this view, as it is located centrally within the arable countryside view.
- Internal Viewpoints:
 - PRow Clothall 019 (Viewpoint 24)
 - PRow Clothall 020 (Viewpoint 22)
- Restricted Byway Clothall 021 (Viewpoint 20): The solar farm comprises a wide extent of the Beane Valley and this can be viewed from BY Clothall 20 to the south. A visualisation from this location would demonstrate the extent of the view that would be occupied by solar development.

Visualisations should be prepared in accordance with the Landscape Institute's Technical Guidance Note 06/19 and GLVIA3, ensuring they are proportionate to the scale and sensitivity of the site and its context.

The Masterplan has demonstrated setbacks from the PRowS that run through and around the site, bound by hedgerows and shrub planting which will reduce the visual impact of the proposals from these susceptible routes. In some locations however, we have concerns that the mitigation planting will obscure longer views which are important local characteristics, such as along the BOAT.

Mitigation planting along PRow 020 also obscures views east across the rolling valley countryside. We appreciate that the mitigation planting is designed to reduce the visual impact of the fencing, PV panels and substation however the planting also further contributes to restricting views of the "expansive open areas of arable farmland" and plateau which is locally exposed (key visual characteristics of LCAs).

Summary:

Significant effects are identified for the PRowS that cross through the site within the submitted LVIA (Table 7.5). We would however judge that significant effects also arise for the BOAT which runs along the western site boundary, for reasons stated above. There are some differences in professional judgements with the submitted LVIA.

We have concerns on the impacts of the proposed on the local landscape character and the experience of this expansive arable landscape.

We advise that Visualisations are submitted to provide more context on the visual impact of the proposals from sensitive receptors, owed to the scale of the development and the impacts on the landscape and visual receptors.

Please do not hesitate to contact us if you have any queries in relation to this advice.

Place Services – Landscape Team

Email: landscape@essex.gov.uk



Place Services provide landscape advice on behalf of North Herts Council.

Please note: This letter is advisory and should only be considered as the opinion formed by specialist staff in relation to this particular matter.

