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Our Ref: 18089

**DWD**

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SG6 3LF

Sent via email to: [planning.control@north-herts.gov.uk](mailto:planning.control@north-herts.gov.uk)

Dear Sir or Madam,

**REQUEST FOR SCREENING OPINION UNDER REGULATION 6 OF THE TOWN AND COUNTRY PLANNING (ENVIRONMENTAL IMPACT ASSESSMENT) REGULATIONS 2017**

**PROPOSED SOLAR PHOTOVOLTAIC FARM AND OTHER ASSOCIATED INFRASTRUCTURE – LAND AT OLD KNEBWORTH LANE, KNEBWORTH, SG3 6NL**

We write on behalf of our client, Xela Energy Ltd (the ‘Applicant’), to formally request an Environmental Impact Assessment (‘EIA’) Screening Opinion from North Hertfordshire District Council (‘the Council’ or ‘NHDC’) under Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (‘the EIA Regs’).

The request for an EIA Screening Opinion relates to a proposed solar photovoltaic (‘PV’) farm with associated infrastructure, access and landscaping (‘the Proposed Development’) on approximately 15.7 hectares (‘ha’) of land at Old Knebworth Lane, Knebworth, SG3 6NL (‘the Site’). It is estimated that the Proposed Development would supply approximately 11 megawatts (‘MW’) of renewable electricity direct via private-wire to the GSK global R&D hub in Stevenage.

The Proposed Development would provide a major local employer and contributor to the regional economy with clean, renewable and sustainable form of electricity at a time of urgent need for low-cost renewable energy generation in the UK. This is necessary to tackle climate change and improve the UK’s security of energy supply, whilst making a valuable contribution to the generation of electricity at a local level and assist in meeting local and national targets for both energy supply and low carbon energy development.

Given the Site encompasses land within the administrative areas of NHDC and Stevenage Borough Council (‘SBC’), EIA Screening Opinions have been requested from both councils. The requests are largely duplicated, with the exception of references to local policy designations, which have been tailored to each council.

**REQUIREMENT FOR EIA**

The EIA Regs cover two main types of development:

- Schedule 1 – identifies all types of projects for which EIA is mandatory; and
- Schedule 2 – identifies the types of projects for which EIA may be required if the project in question is considered likely to give rise to significant environmental effects.

The Proposed Development does not constitute Schedule 1 development as for energy projects, this applies to thermal power stations with a heat output of 300 MW or more and nuclear power stations.

It is considered that the Proposed Development constitutes Schedule 2 development under Section 3(a) of Schedule 2:

*“Industrial installation for the production of electricity, steam and hot water (unless included in Schedule 1)”*

Development proposals described under Schedule 2 require an EIA if they are considered likely to have significant effects on the environment by virtue of factors such as nature, size and location.

The Site, at approximately 15.7 ha, exceeds the applicable threshold of a 0.5 ha site area. Subsequently, the Proposed Development must be screened under the provisions of the EIA Regs to determine whether an EIA is required.

### **SCREENING REQUEST SCOPE**

Regulation 6(2) of the EIA Regs requires a request for a screening opinion to be accompanied by:

- a plan sufficient to identify the land;
- a description of the development; including a description of the physical characteristics of the development and a description of the location of the development, with particular regard to the environmental sensitivity of geographical areas likely to be affected;
- a description of the aspects of the environment likely to be significantly affected by the development;
- a description of any likely significant effects of the Proposed Development on the environment resulting from expected residues and emissions and use of natural resources, in particular soil, land, water and biodiversity; and
- such other information or representations as the person making the request may wish to provide or make.

This letter and the supplementary enclosures provide the following information:

- a Site Location Plan with the boundary of the entire Site edged in red (**Enclosure 1**);
- a description of the Site, its planning designations and the nature and purpose of the Proposed Development;
- an assessment of the possible environmental effects of the Proposed Development and consideration of these within the context of the guidance on EIA;
- MAGIC Map extract, showing national designations/ allocations in the area (**Enclosure 2**);
- an extract from the Hertfordshire Public Rights of Way ('PRoW') Map (**Enclosure 3**);
- an extract from the Local Plan Policies Map, showing local designations/ allocations in the area (**Enclosure 4**);
- a Flood Map for Planning extract, showing flood zones in the area (**Enclosure 5**);

- EIA Definition of a 'Sensitive Area' (**Enclosure 6**);
- Predictive ALC Mapping (Natural England) (**Enclosure 7**); and
- Proposed Cable Route Plan (**Enclosure 8**).

The remainder of this letter considers the Proposed Development within the context of the guidance provided on the potential need for EIA. It follows that the Applicant accepts that the Proposed Development is likely to result in some potential environmental effects, however these are anticipated to be of a limited nature and not significant. This letter seeks to demonstrate in further detail that the Proposed Development (with reference to its size, nature and location) will not require an EIA and the preparation of an Environmental Statement ('ES').

## THE SITE

### *Location and description*

The majority of the Site is situated within the administrative area of NHDC, with the cable route located in SBC. It is located approximately 1 kilometre ('km') northwest of the centre of Knebworth and 2.25 km south of the centre of Stevenage. The GSK global R&D hub is located immediately north of the Site within the administrative area of SBC.

The Site is bound by Knebworth Golf Club to the east, the A1(M) to the west, and segregated by Old Knebworth Lane to the north, which binds the solar development area. A railway line is approximately 350 metres ('m') to the east and the hamlet of Old Knebworth is approximately 950 m southwest. The Site currently has no defined boundary along its southern border. The Site is shown in Figure 1 below and in **Enclosure 1**.

**Figure 1: Red Line Boundary**

*The blue line denotes the LPA administrative boundary; yellow shading denotes the area where there would be no solar panels.*



The Site comprises a single parcel of land that extends across two existing field parcels, with the smaller section in the southeast previously forming part of the driving range associated with the golf course, though this section is no longer in use and is currently overgrown. The majority of the Site is in arable rotation and forms part of an intensive farming regime. The Site also comprises a woodland to the north within which the Warren Springs Primary Substation is located and services the existing GSK Site. This area is shown in yellow shading above in Figure 1.

The surrounding area beyond the A1(M) to the west is predominantly agricultural and rural. In all other directions and especially to the north and south, the land contains more of a mixture of larger urban settlements and agricultural land. The nearest residential property is approximately 400 m southeast in the village of Knebworth. There is a large farmstead containing multiple residential properties approximately 500 m southwest, on the other side of the A1(M).

Overall, the Site benefits from strong existing screening comprising established trees and hedgerows. Old Knebworth Lane to the north has minimal views into the Site due to strong and established boundary vegetation and a rise in topography to the south, which would likely screen views from Knebworth village. The adjoining golf course to the east is also well screened by an established treeline. Screening along the boundary with the A1(M) to the west includes some significant and mature areas, though there are gaps in places. There are opportunities to gap up existing hedgerows and provide new hedgerows along the boundaries to improve visual screening, especially along the A1(M). Additional planting would be provided along the southern boundary to bolster the existing screening and further integrate the Proposed Development into the landscape. There are limited existing trees and hedgerows within the Site itself, only segregating the existing internal field boundary. The Site is located within the Green Belt, with the exception of part of the woodland to the north within SBC's administrative area, which is partly within / outside the Green Belt.

There are no operational solar farms within 5 km of the Site.

## **PLANNING AND ENVIRONMENTAL DESIGNATIONS**

As shown in **Enclosure 2**, the Government's MAGIC mapping system does not identify any environmental designations covering the Site. However, there are a number of designations in close proximity, the nearest being the Knebworth Woods Site of Special Scientific Interest ('SSSI') and ancient woodland approximately 330 m northwest. Further ancient woodland and the Mardley Heath Local Nature Reserve ('LNR') are located approximately 650 m and approximately 2.38 km south respectively.

The MAGIC Map extract also confirms that there are no heritage designations located within the Site, nor any directly adjoining. However, the Knebworth Registered Park and Garden ('RP&G') is approximately 90 m west, on the other side of the A1(M), which contains several Grade I, Grade II and Grade II\* listed buildings. There are further listed buildings in all directions, almost all of which are Grade II, though the closest to the Site is more than 400 m southeast.

According to the new Predictive Agricultural Land Classification ('ALC') Map, the majority of the Site comprises Grade 3a agricultural land which would be classed as best and most versatile ('BMV'), with a small section of 'urban' land in the north. However, the exact Grade would be confirmed by an ALC survey, which would accompany any future planning application.

As shown in **Enclosure 3**, there are no PROWs within or directly adjacent to the Site. The nearest PROW is a footpath known as KNEBWORTH 17 approximately 110 m west on the other side of the A1(M). Further PROWs are scattered in all directions, but all segregated from the Site by intervening development.

A review of the Council's Policies Map (**Enclosure 4**) shows that the entire Site is located within the Green Belt. There are no other designations covering the Site. Knebworth Settlement Boundary, which contains several Allocated Local Plan Housing Sites, is approximately 350 m south. Deards End Lane Knebworth Conservation Area and Old Knebworth Conservation Area are approximately 400 m southeast and 640 m southwest respectively, though there is significant visual separation.

The Site is located entirely within Flood Zone 1, the area at lowest risk of flooding, as shown in **Enclosure 5**. Surface water flood risk is similarly low, with only a small patch along the western boundary present at the 1 in 30 annual likelihood level. However, as the Site is in excess of 1 ha, any forthcoming application would have to be accompanied by a flood risk and drainage strategy.

### **THE PROPOSED DEVELOPMENT**

The Proposed Development is for the construction and operation of a ground-mounted solar PV farm of up to approximately 11 MW, associated infrastructure, landscaping and access.

An operational lifespan of 40 years would be sought. The indicative private-wire cable route would travel north to the GSK site for a short distance, crossing Old Knebworth Lane via an underground installation. The proposed cable is located partially within the administrative area of SBC and therefore identical applications will be submitted to both SBC and NHDC, in accordance with the National Planning Practice Guidance ('NPPG') Paragraph: 011 Reference ID: 14-011-20140306.

The Proposed Development would include the following equipment (approximate):

- Rows of solar panels;
- Substation;
- Inverters;
- Transformers;
- CCTV poles;
- Security fencing;
- Site access gates;
- Biodiversity net gain ('BNG') areas;
- Highway access;
- Protective netting; and
- Buried cable connection.

### ***Solar PV Panels***

The solar farm would consist of solar PV panels placed on metal arrays arranged in rows, allowing for boundary landscaping, perimeter fencing and access.

Each row would be mounted on a simple metal framework, which would be driven into the soil, removing the need for significant foundations. The mounting system is comprised of two separate

elements; upright galvanised steel posts that are screwed or pushed into the ground and an aluminium support frame which is bolted together. The system requires no concrete foundations and is designed to be reversible leaving no trace when removed.

The arrays are spaced to avoid any shadowing effects from one panel to another with topography dictating exact row spacing. The panels would be a maximum of 3 m in height.

### ***Substation***

A customer substation would be required on Site to connect into the GSK global R&D hub. It would most likely be located at the northern tip of the Site to make the cable connection as short as possible. The substation, inverters, and solar panels would be connected by underground electrical cables.

### ***Transformers / Inverters***

The inverters, likely smaller units attached to the rows of arrays, would convert the direct current ('DC') generated by the solar panels into alternating current ('AC'). Transformers, likely contained in small buildings/compounds of up to approximately 3m in height, would convert the low voltage output from the inverters to high voltage suitable for providing electricity to the GSK global R&D hub.

It is currently envisioned that string inverters would be used and therefore inverter boxes would be mounted on the solar panel framework. If centralised inverters are used, then these would be within containerised units of up to approximately 3m in height located throughout the Site, and each unit would be placed on a gravel base.

### ***Underground cable connection***

The Proposed Development would also include an underground cable connection, connecting the solar panels in the south of the Site to the substation within the woodland in the north to supply electricity via private-wire to GSK. The exact location of the cable connection is not known at this stage but would be located within the yellow shaded area shown below. An indicative location of the cable is provided at **Enclosure 8**; however, this is subject to refinement as environmental and technical assessments and reporting evolve. The remaining area of the woodland would not comprise any development. Details relating to the management of construction impacts for the underground cable connection are under 'Biodiversity' below.



### ***Access***

The Site would be accessed at its northern corner via an existing agricultural access off Old Knebworth Lane. This access location is considered suitable, given it has been used by heavy agricultural vehicles for many years, though would require some upgrading and resurfacing.

Site access tracks would be utilised to facilitate movement within the Site for construction and maintenance. It is envisaged that topsoil layers would be excavated to expose a suitable base on which to build the track. The track would then be built up by laying crushed stone, rolled in layers, and would be of permeable construction.

### ***Security***

The Proposed Development would need to be secure. It is envisaged that deer fencing (mesh with wooden posts or similar) to a height of approximately 2 m would be installed along the outer edges of the Site in order to restrict access.

This would be sited inside the outermost hedges/trees/vegetation, ensuring that the fence is visually obscured, and access is available for hedge trimming and maintenance.

Gates would be installed at the access point for maintenance access. These would be the same design, material and colour as the fencing. Badger friendly/small mammal access points would be prescribed at various locations along any fencing to allow the passage of badgers across the Site.

The perimeter of the Site would be protected by a system of CCTV cameras and/or infra-red cameras, which would provide full 24-hour surveillance around the entire perimeter. An intelligent sensor management system would manage the cameras. The cameras would be on poles of up to approximately 2.5 m high, spaced at intervals along the security fence. There would be no lighting within the Site except for emergencies.

### ***Landscaping***

As detailed above, the Proposed Development would include a package of landscape, ecological, and biodiversity benefits. An illustrative landscaping plan would be provided with the application. Land between and beneath the panels can be used for enhanced grassland and potentially for seasonal grazing for sheep. Any existing hedgerows would be bolstered with additional hedgerow planting, where required, in addition to potential new mitigation planting around the boundaries of the Site to provide natural screening where appropriate. A minimum 10% BNG would be achieved, in accordance with the statutory requirement.

### ***Construction***

The construction phase of the Proposed Developments is expected to last approximately 6 months. During this period, initial site setup and any necessary access works would take place followed by construction of the internal access tracks, ground works, and the installation of the solar panels and other infrastructure.

Facilities would be provided on site for construction workers, including provision of a site office and welfare facilities. Fencing would be installed around the perimeter of the Site, as discussed, and temporary parking would be provided for the construction workers.

### Operation

Once operational, occasional maintenance of the solar panels and other infrastructure would be required. The solar panels also would also need to be periodically cleaned, most likely using simply soap and water, to ensure the efficient running of the system.

Once operational, it is anticipated that the Site would operate predominantly by remote access and only visited on an occasional basis for management and maintenance purposes.

### Decommissioning and restoration

At the end of the Proposed Development's lifespan of 40 years, the solar panels and other infrastructure would be removed, and the Site restored. The small quantity of foundations, hard surfacing and heavy infrastructure, in combination with retaining most of the Site as grassland, mean that the land would be easier to restore than other more intrusive development, e.g. large buildings requiring significant foundations.

The restoration process is intended to ensure that the land is restored to the same quality as it was previously, and it is envisaged this would be secured through a suitable condition attached to any planning permission.

### ASSESSMENT OF POTENTIAL ENVIRONMENTAL IMPACTS

Schedule 3 of the EIA Regs identifies criteria that should be considered in screening Schedule 2 developments in terms of the need for EIA. These encompass the characteristics of the Proposed Development, including the cumulation with other development; the location of the development; the environmental sensitivity of the area; and the characteristics of the potential impact.

The Secretary of State's view is that, in general, EIA is only needed for Schedule 2 development in three main types of case:

- for major developments that are of more than local importance;
- for developments that are proposed within a particularly environmentally sensitive or vulnerable location; and
- for developments with unusually complex and potentially hazardous environmental effects.

Paragraph 018 Reference ID 4-018-20170728 of the Government's Planning Practice Guidance provides guidance in relation to the need for EIA for Schedule 2 development that:

*"Only a very small proportion of Schedule 2 development will require an assessment. While it is not possible to formulate criteria or thresholds which will provide a universal test of whether or not an assessment is required, it is possible to offer a broad indication of the type or scale of development which is likely to require an assessment...To aid local planning authorities to determine whether a project is likely to have significant environmental effects, a set of indicative thresholds and criteria have been produced."*

The guidance further states:

*"...it should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits."*

An assessment as to whether the Proposed Development requires EIA is set out below:

- **Environmentally sensitive areas** – the Site does not lie within an environmentally sensitive area defined in the EIA Regs (see **Enclosure 6**), as confirmed by the MAGIC Maps extract within **Enclosure 2**. The nearest statutory environmental designation is Knebworth Woods SSSI and ancient woodland approximately 330 m northwest. Further ancient woodland and the Mardley Heath LNR are located approximately 650 m and approximately 2.38 km to the south respectively.

The environmental sensitivity of the location is an important factor in determining whether EIA is required. In this case, the Site is within a location that is considered to be of relatively low environmental sensitivity and certainly not the type of location where the EIA Regs indicate that there would be the need for an EIA. The design and appropriate mitigation measures during construction would ensure no detrimental impacts on the closest SSSI. Once operational, the solar farm would be relatively inert and be managed to avoid adverse environmental impacts.

As a result, the Proposed Development is not located within nor would have any detrimental impact on sensitive areas. It is therefore concluded that there would be no significant effects as a result of the Proposed Development.

It is however noted that the Site is located within the Green Belt and this is discussed below under Landscape and Visual Impact.

- **Land use and agricultural land quality** – according to the new Natural England Predictive ALC Map<sup>1</sup>, the majority of the Site comprises Grade 3a agricultural land (**Enclosure 7**) which would be classed as BMV, with a small section of ‘urban’ land in the north. However, the exact Grade would be confirmed by an ALC survey, which would accompany any future planning application.

The majority of the Site is currently used as arable land and the Applicant acknowledges that agricultural land is a valuable resource, particularly BMV land. This excludes the northern woodland where the underground cable would be located and the golf course which are not in agricultural use. Sheep grazing and grass collection for feed often form part of the land management of the Site, allowing a form of agricultural use to continue and most of the Site would be planted with a combination of grassland/meadow, including land between and underneath panels. This scenario would allow agriculture and renewable energy generation to be facilitated simultaneously. At the end of the Proposed Development’s lifespan, the panels and other infrastructure would be removed, and the land restored to its original condition. It follows that there would be no permanent loss of agricultural land as a result of the Proposed Development

The Proposed Development and other solar farms are generally only viable in countryside/greenfield locations. This is because sites that are large enough to accommodate the proposed MW output and make a significant contribution to meeting urgent local and national net-zero greenhouse gas emission targets are extremely difficult to find in settlements and/or on previously developed land (where other development pressures and market forces apply).

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<sup>1</sup> <https://environment.data.gov.uk/explore/a817d96f-271d-487b-89ad-48d271f931aa>

The Applicant would also explore opportunities for continued agricultural practices whilst the solar farm is in operation, thereby diversifying the farm's operations. For example, through grazing of sheep during its operation.

Furthermore, there are advantages for the soil at the Site, for soil carbon storage and for the environment from converting arable land to grassland as is proposed under the panels. A soil management plan is proposed to be secured by condition to ensure no detrimental impacts to soils during construction. No significant areas of agricultural land would therefore be downgraded, and there are potential benefits to soil quality long-term.

It is therefore considered that there would be no significant effects with regards to impacts on land use or agricultural land quality.

- **Biodiversity** – the Site is not designated for its biodiversity value at national or international level; rather, the Site predominantly comprises of intensively farmed agricultural land that is of negligible/low ecological value, with a portion of the Site located in the northern woodland that would comprise an underground cable connection only. As aforementioned, national and international ecological designations are situated a significant distance from the Site, with the nearest being Knebworth Woods SSSI and ancient woodland approximately 330 m northwest.

Given the nature of the Proposed Development, indirect impacts to receptors are considered highly unlikely. Nevertheless, the appropriate ecological surveys and assessments would be conducted and submitted with any future planning application. Given the managed nature of the agricultural habitats within the Site, the potential for notable populations of protected species and habitats to be present is predicted to be low. Any potential impacts to protected species and habitats would be managed through mitigation strategies, including sensitive construction methods and appropriate buffers from sensitive habitats. These measures would be detailed within a Construction Environmental Method Statement to be secured by condition.

As shown in **Enclosure 8**, the proposed cable route passes within/in close proximity to areas of woodland. A tree survey would be undertaken to determine the value of these trees and existing gates and gaps in the tree line / hedgerow would be prioritised as far as possible. A Construction Environmental Method Statement (or similar) would also detail installation methods for the cable route and how any adverse impacts to the trees to the north would be avoided / mitigated. For the avoidance of doubt, none of the trees in proximity to the cable route are protected by any statutory environmental designation nor are there proposals to permanently remove trees or hedgerows. As a result of this and the temporary construction impacts being appropriately managed, the impact on arboriculture and ecology is not considered to be significant.

Furthermore, various landscape and biodiversity enhancement measures would be proposed, and would be secured by condition through a detailed landscape plan and Landscape and Ecological Management Plan. An indicative landscape plan would be submitted with the planning application.

A BNG assessment would also be undertaken to achieve at least 10% net gain in accordance with national policy.

Overall, it is clear that in EIA terms, there are no potentially significant effects related to biodiversity, and therefore on the grounds of biodiversity, EIA should not be required.

- **Landscape and visual impact** – The Site is not subject to any locally, nationally or internationally important statutory landscape designations. Any development in this location would retain the most valuable features, such as hedgerows and the undulating landform, and utilise only open field parcels for locating solar panels. All mature trees would be retained, unless it is absolutely necessary to remove them (though tree removal is not anticipated at this stage), providing long term landscape and biodiversity conservation. Proposed planting and gapping up of existing boundaries with native hedgerows and trees on Site would adequately screen or filter the Proposed Development and assimilate it effectively into the landscape.

In respect of landscape and visual matters, the Site benefits from strong existing screening and is physically and visually well contained by the combination of the vegetated A1(m) banks; the golf course; other public highways; and established woodland and urban development to the north. The nearest PRoW is approximately 110 m west of the Site and is visually segregated by the A1(M). Residential properties are located at some distance to the south of the Site, beyond intervening fields, vegetation, and infrastructure. It is also notable that the landscape to the north, east and south are partially characterised by urban development, especially to the north. It is not considered that the Proposed Development would therefore not form an incongruous feature within the area.

Any future planning application would include a Landscape and Visual Assessment (LVA), which would inform the design process to mitigate potential impacts, including via the siting and design of new equipment and the extent of new planting within the Site, so as to increase its physical and visual enclosure. This is to ensure the Proposed Development responds positively to the aims of Policy NE12: Renewable and low carbon energy development, to demonstrate sensitive design, which is integrated into the local environment. With the incorporation of the mitigation, it is predicted that any landscape and visual effects would be localised and minimised, such that they would not be significant. Mitigation proposals would be identified as part of an iterative process to assist in reducing any potential adverse effects of the proposal

As the area of the Site where there would be above-ground development is within the Green Belt, the LVA would include an assessment of the Site's contribution to the National Planning Policy Framework Green Belt purposes and the likely effect to these. A standalone Green Belt Assessment would also be provided with any future planning application. It should be noted that the underground cable route would not comprise above ground development and is partly outside the Green Belt.

Although there is potential for some, and overall temporary, landscape impacts, with suitable mitigation proposals provided in the form of a well-considered Landscape Strategy, any impact could be mostly limited to ensure no significant adverse effects. Furthermore, there would be landscape and biodiversity enhancements provided through the comprehensive landscape plan.

It is therefore considered that there would be no significant effects with regards to impacts on landscape and visual amenity.

- **Cultural heritage** – The Site itself is not identified as having any designated archaeological significance and does not contain any listed buildings, Scheduled Monuments or other designated heritage assets. However, as mentioned previously, Knebworth RP&G is approximately 90 m west on the other side of the A1(M), which contains several Grade I, Grade II and Grade II\* listed buildings. There are further listed buildings in all directions, almost all of which are Grade II, the closest to the Site being in excess of 400 m southeast. It is considered

that these are unlikely to be impacted by the Proposed Development, due to the screening provided by the existing and proposed planting, and the intervening A1(M).

However, any forthcoming planning application would include a settings assessment as part of the Cultural Heritage Assessment. Appropriate design mitigation and landscaping would be implemented, where necessary, to mitigate any impact on heritage assets and their settings.

Like any rural site, there is also the potential for impacts on any unknown archaeological assets within the Site. The Cultural Heritage Assessment would therefore include detailed consideration of this. A geophysical survey would also be undertaken to establish whether or not there are any significant buried archaeological remains within the Site, and if any mitigation would be required for the solar panel area and/or excavation for the underground cable. It should be noted that solar farms are relatively low impact in terms of ground disturbance. The predicted impacts on archaeological remains resulting from the Proposed Development therefore stands in marked contrast to other forms of greenfield development, such as mineral extraction, which is wholly destructive, and housing developments, which are largely, if not wholly, destructive.

It is therefore considered that the Proposed would not result in significant environmental effects to cultural heritage or archaeology.

- **Noise** – The Proposed Development would be passive in operation and would therefore not generate any significant operational noise, other than from the inverters/transformers. However, these would be carefully sited in a location where any potential impacts can be minimised. Otherwise, the only noise would be that associated with occasional visits by maintenance/service vehicles. The noise associated with such activities would be negligible and less than that associated with farming activities in the area.

There would be some temporary noise during the construction phase, which is anticipated to last approximately 6 months. This would include the following activities: vehicle movements along access tracks and haulage routes associated with the delivery and removal of construction materials; equipment delivery; site and ground preparation activities; erection of panels using construction machinery; and material hauling. The construction activities may increase noise levels within the vicinity of the Site; however, it is considered that noise impacts during construction would be intermittent, localised and temporary in nature, especially when considering the noise generated by the adjoining A1(M).

In conclusion, given the temporary nature of the construction impacts and mitigation measures proposed, it is not considered that there would be any significant noise impacts as a result of the Proposed Development.

- **Air emissions** – The Proposed Development would not result in any emissions to air during its operation other than those from vehicles associated with periodic maintenance/inspection visits to the Site. Emissions associated with the construction phase would relate to construction vehicles and would not be of a level to cause harm to the environment or residential amenity. They would be somewhat offset by a reduction in emissions related to the current arable farming of the land. Furthermore, it is considered that emissions would be more than offset by the significant benefits of generating renewable energy at the Site when compared to electricity generated by the current energy mix.

Any impacts, such as dust and odour, would be managed in accordance with standard best practice measures and can be mitigated, to ensure no significant adverse effects.

In conclusion, given the temporary nature of the construction impacts and mitigation measures proposed, it is not considered that there would be any significant emissions impacts as a result of the Proposed Development.

- **Waste** – No waste would be generated during the operation of the Proposed Development. Due to the methods of installation, limited if any waste would be generated during the construction phase.

In conclusion, given the temporary nature of the construction impacts and mitigation measures proposed, it is not considered that there would be any significant waste impacts as a result of the Proposed Development.

- **Flood risk/drainage** – The entirety of the Site is located within Flood Zone 1 (land within 1 in 1,000 annual probability of river flooding) and is generally at low risk of surface water flooding. However, given the site area, the planning application would be accompanied by a Flood Risk Assessment and Drainage Strategy outlining how the Proposed Development would remain operational and safe for users in times of flood, result in no net loss of floodplain storage, and would not impede water flows and not increase flood risk elsewhere.

With regard to the cable route, due to it being a buried service encased within waterproof ducting, and with the reinstallation of the existing groundcover, it would not be at risk from flooding or water damage, nor would it impact overland flow.

In conclusion, it is not considered that there would be any significant flooding impacts as a result of the Proposed Development.

- **Traffic** – Traffic associated with the Proposed Development would be largely limited to the temporary construction phase, during which appropriate and proportionate management measures would be implemented. Traffic during operation would be limited to periodic maintenance/inspection. The planning application would however be accompanied by a Transport Statement.

The cable route would need to cross Old Knebworth Lane, meaning the provisions of Section 50 of the New Roads and Street Works Act 1991 would apply. This requires a separate licence to be sought from the Local Highway Authority prior to the works commencing. In turn, this license will ensure that the work is carried out in a safe manner that is not unduly disruptive to traffic using the carriageway in which the cable will be installed.

In conclusion, given the temporary nature of the construction impacts and mitigation measures proposed, it is not considered that there would be any significant transport impacts as a result of the Proposed Development.

- **Complex and potentially hazardous environmental effects** – The Proposed Development is not of a nature, being for the generation of renewable energy, that presents any complex or potentially hazardous environmental effects. During the construction phase, the contractor(s) would implement measures in accordance with health and safety legislation/requirements and best practice to minimise the risks of accidents that could have effects on people or the environment.

In conclusion, given the temporary nature of the construction impacts and mitigation measures proposed, it is not considered that there would be any complex and potentially hazardous environmentally effects as a result of the Proposed Development

- **Cumulative effects** – A search of satellite imagery, the Councils’ online planning registers, and the Planning Inspectorate’s list of Nationally Significant Infrastructure Projects was undertaken to identify any solar farms or other renewable energy developments within 5 km of the Site across the last 5 years. The search found two relevant applications:
  - 3/25/0950/FUL (East Herts District Council) - installation of 480 Photovoltaic Solar Panels, with an output of circa 240,000kWh of energy, with supporting infrastructure and landscaping works, approximately 4.1 km northeast of the Site. This was approved on 12 March 2026.
  - 24/02455/FP (North Herts District Council) - solar farm measuring 35.5 hectares with associated battery storage and ancillary infrastructure, approximately 5 km northwest of the Site. Approved on 28 July 2025.

The review of satellite imagery indicated that there are currently no operational solar farms within 5 km of the Site.

Overall, owing to the distance, size and nature of the above schemes, it is not considered that they would cause any cumulative impacts.

In addition, we would emphasise the below text from the National Planning Practice Guidance (Paragraph 024 Reference ID: 4-024-20170728) which states that:

*“Each application (or request for a screening opinion) should be considered on its own merits. There are occasions, however, when other existing or approved development may be relevant in determining whether significant effects are likely as a consequence of a proposed development.”*

As such, we do not consider that at this point in time there would be a requirement to assess the cumulative effects under an EIA. In conclusion, it is not considered that the Proposed Development would not result in any significant cumulative effects during construction or operation, such that EIA is required.

Overall, in view of the characteristics of the Proposed Development, the relatively low environmental sensitivity of the location and the limited potential for impacts, it is considered that the proposed solar farm would not result in significant environmental effects that require an EIA to be undertaken.

Furthermore, it is noted that Screening Opinions were provided by NHDC on the following solar schemes of a similar scale where it was considered that they were not EIA development, with none found in the adjoining SBC:

- **24/01908/ADJ** – EIA Screening Opinion. Construction of a solar farm. Land South Of Ashwell Street Bassingbourn, South Cambridgeshire. EIA not required (19 September 2024);
- **21/02628/SO** – EIA Screening Opinion. Construction of a solar farm. Land Opposite Wymondley Grid Station And To The South Of Sperberry Hill St Ippolyts Hertfordshire. EIA not required (5 November 2021);
- **21/02228/SO** – EIA Screening Opinion. Construction of a solar farm. Land To The North And East Of Great Wymondley Hertfordshire. EIA not required (13 September 2021); and
- **21/01446/SO** – EIA Screening Opinion. Construction of a solar farm. Land West Of Ashwell Road Bygrave Hertfordshire SG7 5EB. EIA not required (26 May 2021).

## **SUMMARY AND CONCLUSIONS**

The Proposed Development involves the generation of renewable energy. It would provide a major local employer and contributor to the regional economy with clean, renewable and sustainable form of electricity at a time of urgent need for low-cost renewable energy generation in the UK. This is necessary to tackle climate change and improve the UK's security of energy supply, whilst making a valuable contribution to the generation of electricity at a local level and assisting in meeting local and national targets for both energy supply and low carbon energy development.

The Proposed Development would provide landscape enhancements for the area, resulting in significant BNG, whilst also providing economic benefits through local employment and support for the rural economy.

Whilst in the Green Belt, the Site is not environmentally sensitive nor subject to any national or international environmental designations. It would also include mitigation measures to avoid any detrimental significant impacts on adjacent assets. It would not involve complex or potentially hazardous environmental effects, and the use is for a temporary period of time with the land reverting back to its current use.

The Proposed Development does not therefore, in our view, represent EIA development.

We look forward to receiving the Council's Screening Opinion within the 3-week statutory timeframe as specified by the EIA Regs.

Should additional information be required please do not hesitate to contact me directly. We very much look forward to hearing you.

Yours faithfully,



**Rob Booth MRTPI**

**Director**

**DWD**

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### **Enclosures:**

Site Location Plan – **Enclosure 1**

MAGIC Maps Extract – **Enclosure 2**

Hertfordshire PRow Map Extract – **Enclosure 3**

Local Plan Policies Map Extract – **Enclosure 4**

Flood Map for Planning Extract – **Enclosure 5**

EIA Definition of a 'Sensitive Area' – **Enclosure 6**

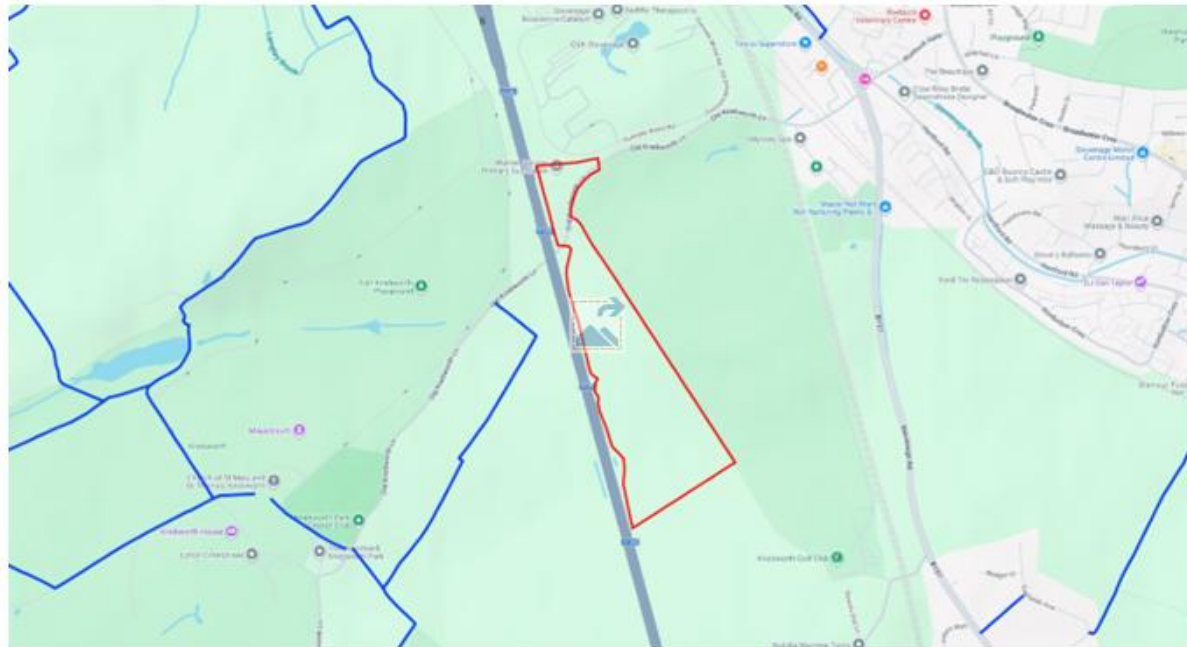
Predictive ALC Mapping (Natural England) – **Enclosure 7**

Proposed Cable Route Plan – **Enclosure 8**





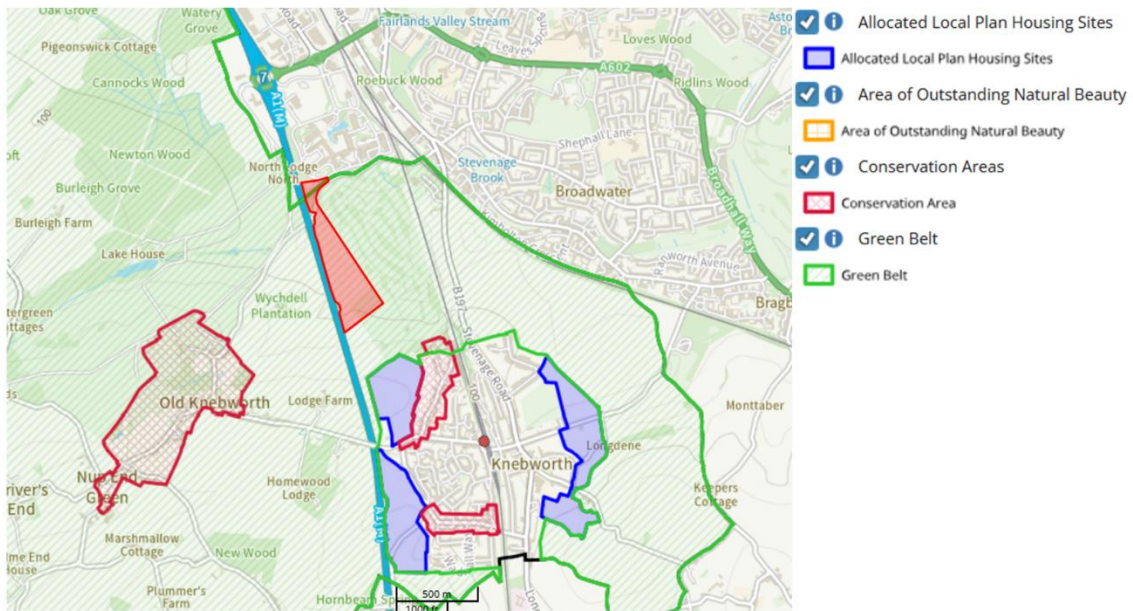
## Hertfordshire PRow Map Extract – Enclosure 3



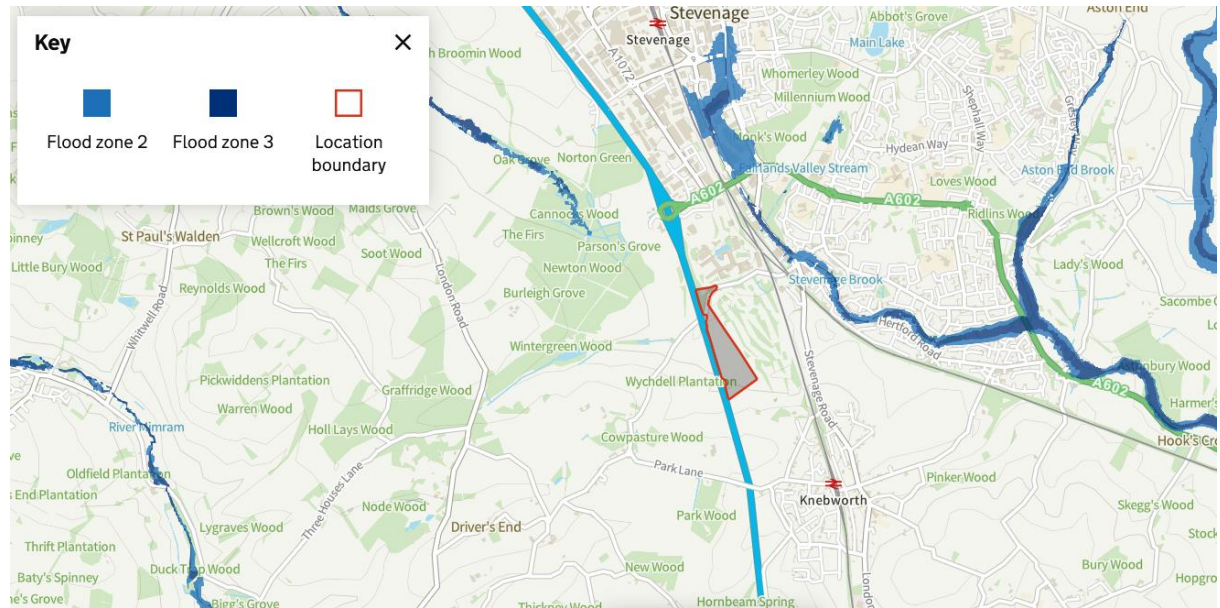
- Public Rights of Way
- Site application area

## Local Plan Policies Map Extract – Enclosure 4

# DWD



## Flood Map for Planning Extract – Enclosure 5



## EIA definition of a 'Sensitive Area' (Regulation 2)

A1.1 “sensitive area” means any of the following—

A1.2 (a) land notified under section 28(1) (sites of special scientific interest) of the Wildlife and Countryside Act 1981(23);

A1.3 (b) a National Park within the meaning of the National Parks and Access to the Countryside Act 1949(24);

A1.4 (c) the Broads(25);

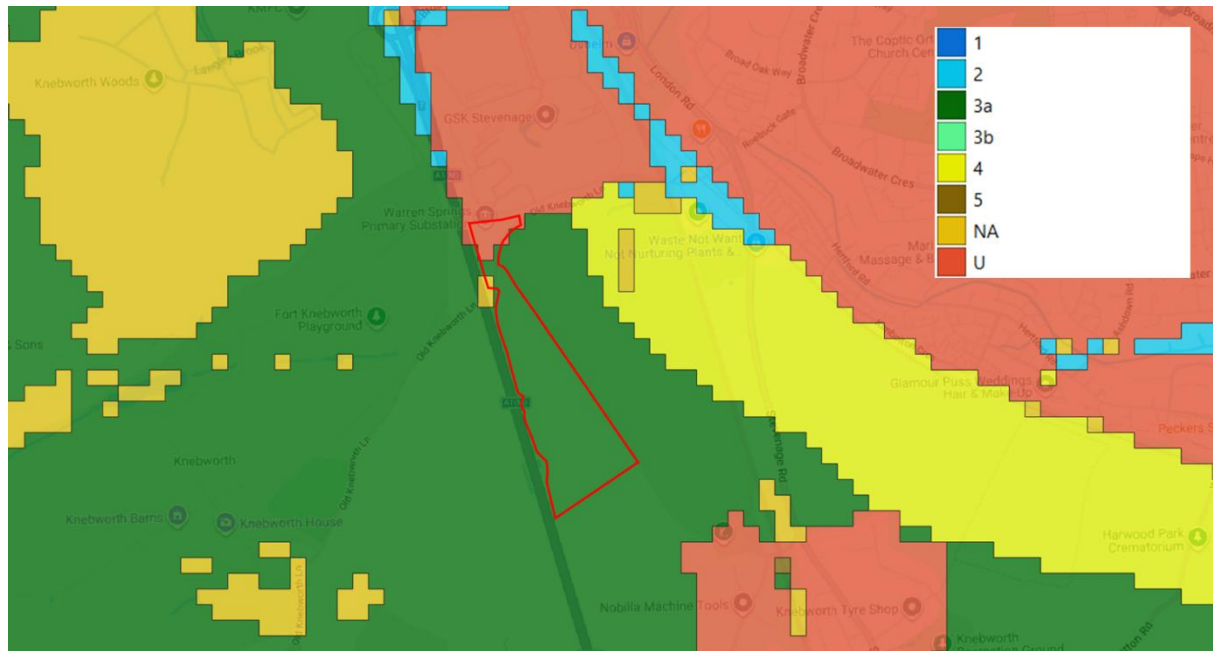
A1.5 (d) a property appearing on the World Heritage List kept under article 11(2) of the 1972 UNESCO Convention Concerning the Protection of the World Cultural and Natural Heritage(26);

A1.6 (e) a scheduled monument within the meaning of the Ancient Monuments and Archaeological Areas Act 1979(27);

A1.7 (f) an area of outstanding natural beauty designated as such by an order made by Natural England under section 82(1) (areas of outstanding natural beauty) of the Countryside and Rights of Way Act 2000(28) as confirmed by the Secretary of State;

A1.8 (g) a European site.

## Predictive ALC Mapping (Natural England) – Enclosure 7



## Proposed Cable Route Plan – Enclosure 8



XELA  
ENERGY

Underground cable connection  
Substation