

GLINT AND GLARE ASSESSMENT WESTFIELD ENERGY CONSERVATION PARK

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1 INTRODUCTION

Metrica Environmental Consulting Ltd ('Metrica') has been commissioned by Lanpro Limited (the 'Client') on behalf of Lightrock Power (the Applicant), to undertake a Glint and Glare Assessment as part of a planning application for the Westfield Energy Conservation Park (the Proposed Development) comprising a Battery Energy Storage System (BESS) and co-located ground mounted solar farm, associated infrastructure, access, biodiversity enhancements and landscaping on land south of A507 at Westfield Common, Hertfordshire (the Site).

2 GLINT AND GLARE DEFINITION

'Glint' and 'Glare' are the effects caused by the reflection of sunlight from surfaces such as glazing or solar photovoltaic (PV) panels. The UK Government's National Policy Statement for Renewable Energy Infrastructure (EN-3)¹ defines these terms as follows:

- ◆ Glint: *"a momentary flash of light that may be produced as a direct reflection of the sun in the solar panel";* and
- ◆ Glare: *"a continuous source of excessive brightness experienced by a stationary observer located in the path of reflected sunlight from the face of the panel".*

It goes on to say that... *"Most commercially available solar panels are designed with anti-reflective glass or are produced with anti-reflective coating and have a reflective capacity that is generally equal to or less hazardous than other objects typically found in the outdoor environment, such as bodies of water or glass buildings".*

3 DEVELOPMENT OVERVIEW

The Proposed Development's solar arrays consist of eight areas which contain fixed-tilt PV panels, modelled with a tilt angle of 20 degrees and an azimuth of 180 degrees (i.e. south-facing).

The Landscape Masterplan shows that extensive planting incorporated into the design, in particularly along the northern boundary, south of the A507 Clothall road. As outlined in the Landscape and Visual Impact Assessment (LVIA), the proposed development allows for forward planting and growing out of hedgerows pre-construction to provide additional screening than is existing. Where necessary feathered trees will be used to fill gaps, and it is therefore anticipated that the planting will be sufficient to screen potential glare to the road. If any gaps remain following construction, a roll mesh will be applied to the security / deer fence as required as a temporary measure.

A layout drawing showing the Proposed Development boundary and PV areas is provided in Appendix 1 for reference.

The Proposed Development is located to the west of the proposed Beane Solar Farm (application reference: 3/24/2245/FUL), which was submitted to East Herts Council in December 2024, and at the time of writing is currently awaiting decision.

¹ UK Government (November 2023). National Policy Statement for Renewable Energy Infrastructure.

4 GUIDANCE

4.1 PLANNING GUIDANCE

The following guidance and standards are pertinent to this assessment:

- ◆ The National Planning Policy Framework (NPPF)²; and
- ◆ National Policy Statement for Renewable Energy Infrastructure (EN-3).

4.1.1 The National Planning Policy Framework

The NPPF sets out the Government's planning policies for England, providing a framework within which local policies can be developed. The key principle of the NPPF is a presumption in favour of sustainable development, although no specific references to solar PV development or glint and glare effects are made.

4.1.2 National Policy Statement for Renewable Energy Infrastructure

EN-3 notes that solar PV panels are specifically designed to absorb, rather than reflect light, however, they may nevertheless reflect the sun's rays at certain times / angles, potentially causing glint and glare effects.

EN-3 recommends a two-stage approach to determining the potential for glint and glare impacts. As a first stage, receptors should be mapped qualitatively to identify any potential glint and glare issues and determine whether a detailed glint and glare assessment is necessary as part of the application.

When a quantitative glint and glare assessment is found to be necessary, the geometric possibility of glint and glare affecting nearby receptors should be investigated through modelling, and an assessment of potential impact provided, based on the angle and duration of incidence and the intensity of the reflection.

With specific reference to aviation, EN3-notes that..."there *is no evidence that glint and glare from solar farms results in significant impairment on aircraft safety. Therefore, unless a significant impairment can be demonstrated, the Secretary of State is unlikely to give any more than limited weight to claims of aviation interference because of glint and glare from solar farms*".

Notwithstanding the above, EN-3 does not provide specific assessment criteria, or give guidance on what is considered to be an acceptable level of impact.

4.2 TECHNICAL GUIDANCE

UK planning guidance does not provide a specific methodology for assessing the impact of glint and glare. However, the following guidance is regularly applied to assessments in the UK and together is considered to provide a reasonable and robust approach:

- ◆ Measurement and Assessment of Light Immissions³;

² UK Government (2012). National Planning Policy Framework (last updated Feb 2025).

³ Ministry for the Environment, Health and Consumer Protection (2014). Light Guidelines (Leitlinie des Ministeriums für Umwelt, Gesundheit und Verbraucherschutz zur Messung und Beurteilung von Lichtimmissionen,

- ◆ Rail Industry Standard (RIS) RIS-0737-CCS⁴
- ◆ Aerodrome Safeguarding Advice Notice 5: Renewable Energy Developments⁵; and
- ◆ Review of Solar Energy System Projects on Federally-Obligated Airports⁶.

4.2.1 Measurement and Assessment of Light Immissions

The German Ministry for Environment, Health and Consumer Protection published the *Measurement and Assessment of Light Immissions* in 1993, which was most recently updated in 2014. Paragraph 8 of the most recent version of the guidelines is dedicated to the assessment of reflections from solar PV panels.

The guidelines state that... [translated from German] *"experience has shown that immission locations that are more than approximately 100 m away from a photovoltaic system only experience short-term glare effects. Only in the case of extensive photovoltaic parks could more distant immission locations still be relevant."*

In addition, the guidelines note that where a reflection source is located in the same direction (+/- 10 degrees) as the sun itself, the direct glare from the sun masks any reflections, and can therefore be scoped out of further assessment.

For those receptors⁷ within the study area described above, the guidelines state that effects are acceptable providing that glare is experienced for no more than 30 minutes on any given day, or more than 30 hours per year.

4.2.2 RIS-0737-CCS

Network Rail guidance does not provide a specific methodology for the assessment of glint and glare effects on rail infrastructure. However, Rail Industry Standard (RIS) RIS-0737-CCS states that... *"a planned change external to the railway could affect signal sighting, for example changes that affect the built environment (for example, a new structure causing obscuration, a solar farm causing reflection)."*

4.2.3 Aerodrome Safeguarding Advice Notice 5: Renewable Energy Developments

The UK Civil Aviation Authority (CAA) issued a guidance note, Renewable Energy Developments, in April 2024. This guidance note was prepared by the Combined Aerodrome Safeguarding Team (CAST), supported by the CAA, and aims to provide safeguarding advice in relation to renewable energy developments on a range of matters, including glint and glare from PV developments.

With specific reference to glint and glare effects, section 2 of the guidance note states that:

"In most cases, an assessment should be undertaken for a solar energy development which is being proposed within a specific distance (indicated by the aerodrome authority) from an

⁴ Rail Industry Standard (RIS) RIS-0737-CCS 'Signal Sighting Assessment Requirements'

⁵ CAA (2024). Renewable Energy Developments, CAST Aerodrome Safeguarding Guidance Note 5.

⁶ Federal Aviation Administration (2021) Review of Solar Energy System Projects on Federally-Obligated Airports.

⁷ In this context, 'receptors' are primarily residential dwellings, but where relevant, can also include hotels, hospitals, schools and offices.

aerodrome. For many aerodromes, 5 km is the distance of choice but it could be considered out to 10 km. In exceptional circumstances, assessments may be required beyond 10 km."

No specific methodology or assessment criteria are defined for assessing the impact of glint and glare on aviation infrastructure.

4.2.4 Review of Solar Energy System Projects on Federally-Obligated Airports

In 2013, the United States' Federal Aviation Administration (FAA) published interim guidance which stated that for a solar PV development to obtain FAA approval or to receive no objection, there should be no more than a *"low potential for after-image"* along the final ²mile approach path for any existing or proposed runway, as defined by Sandia Laboratories' Solar Glare Hazard Analysis Tool (SGHAT).

SGHAT categorises glint and glare into three tiers of severity (ocular hazards) that are referred to as different colours in the model output. These categories show the potential impact of retinal irradiance as a function of subtended source angle as defined by Ho *et al.* (2011)⁸, and implemented by SGHAT software and its successors. It should be noted that these categories are intensity, rather than duration-dependent:

- ◆ Red glare: Glare predicted with a potential for permanent eye damage (retinal burn);
- ◆ Yellow glare: Glare predicted with a potential for temporary after image; and
- ◆ Green glare: Glare predicted with a low potential for temporary after image.

It also notes that no significant impacts are possible for reflections located more than 50 degrees either side of the direction of travel.

Page 2 of the interim guidance stated that *"the FAA expects to continue to update these policies and procedures as part of an iterative process as new information and technologies become available."*

4.2.4.1 2021 Update

In accordance with the above, the Interim FAA guidance was updated in 2021 to reflect the state of knowledge at the time.

As part of the update, the FAA withdrew the requirement to undertake glint and glare analysis using SGHAT as the software is no longer available. The assessment of glint and glare impacts due to the Development therefore uses modelling alternative industry standard software which utilises the same methodology as SGHAT.

With regard to the potential for solar glint and glare impacts in general, the 2021 update states the following in the section entitled 'Developments Since Interim Policy':

"Initially, the FAA believed that solar energy systems could introduce a novel glint and glare effect to pilots on final approach. FAA has subsequently concluded that in most cases, the glint and glare from solar energy systems to pilots on final approach is similar to glint and glare pilots routinely experience from water bodies, glass-façade buildings, parking lots, and similar features. However, FAA has continued to receive reports of potential glint and glare

⁸ Ho, C. K., Ghanbari, C. M., and Diver, R. B., 2011, Methodology to Assess Potential Glint and Glare Hazards From Concentrating Solar Power Plants: Analytical Models and Experimental Validation, *ASME J. Sol. Energy Eng.*, 133.

from on-airport solar energy systems on personnel working in ATCT [Air Traffic Control Tower] cabs. Therefore, FAA has determined the scope of agency policy should be focused on the impact of on-airport solar energy systems to federally-obligated towered airports, specifically the airport's ATCT cab."

Given the above, it is clear that the FAA now consider that with the exception of ATCTs, no unacceptable glint and glare impacts are expected from solar PV panels in terms of aviation safety.

5 STUDY AREAS

Figures 1 and 2 in Appendix 2 illustrate the study areas applicable to this assessment, derived in accordance with the criteria detailed in the following sections.

5.1 RESIDENTIAL RECEPTORS

As stated in Section 4.2.1, glint and glare effects are unlikely to be an issue for receptors more than approximately 100 m from PV panels, due to the reduced intensity and short duration of effects beyond this distance. However, as this distance is approximate and dependent upon the extent of the Development, the residential receptor study area for this assessment has been based upon a 200 m buffer distance in order to ensure a robust approach.

5.2 ROAD AND RAIL INFRASTRUCTURE

In the absence of specific guidance on the assessment of glint and glare impacts on road and rail infrastructure, the FAA 2013 guidance has become the *de facto* methodology in the UK for drivers of such vehicles.

The assessment criteria for road and rail infrastructure relate purely to glare intensity, rather than duration of effects. In line with FAA 2013 guidance (see Section 5.3.4), whilst 'green' glare is acceptable, any incidence of 'yellow' or 'red' glare is it is considered an adverse impact, regardless of duration.

An appropriate study area for road and rail infrastructure has been determined through modelling. It was found that for typical large-scale solar developments in the UK, there is no reasonable prospect of 'yellow glare' occurring beyond approximately 375 m, based on the following typical worst case parameters:

- ◆ A 2 km² (2 km x 1 km) PV array;
- ◆ No anti reflective coating;
- ◆ Tilt angles of 20 to 30 degrees; and
- ◆ Receptors located at heights between 1.5 m and 50 m above ground level (AGL).

Notwithstanding the above, a study area of 500 m for road and rail infrastructure has been adopted to ensure a conservative approach.

In line with widely accepted best practice, modelling has been limited to national and regional routes (motorways, A roads and B roads). Local (unnumbered / unclassified) roads within the 500 m study area are not modelled due to their reduced traffic densities and speeds, meaning the potential impact of any temporary reflection is inherently low.

5.3 AERODROMES AND AVIATION INFRASTRUCTURE

The study area for aerodromes as defined in CAA guidance is as follows:

- ◆ 10 km for safeguarded civil or military aerodromes⁹; and
- ◆ 5 km for other / non-safeguarded aerodromes.

Notwithstanding the above, CAA guidance also states that: *“in exceptional circumstances, assessments may be required beyond 10 km”*.

In line with the above, and as a conservative approach, an additional screening exercise was undertaken to identify additional safeguarded civil or military aerodromes, between 10 and 13 km from the Development. This ensures that all potential runway approach paths within 10 km of the Development are identified, even if the runway itself is greater than 10 km from the Development.

6 ASSESSMENT CRITERIA

6.1 RESIDENTIAL RECEPTORS

The assessment criteria for residential receptors are those described in Section 4.2.1, i.e., that the glint and glare effects are acceptable providing such effects occur for no more than 30 minutes per day, or 30 hours (equivalent to 1,800 minutes) per year.

6.2 ROAD, RAIL AND AVIATION RECEPTORS

The assessment criteria for road, rail and aviation receptors are those described in Section 4.2.4, i.e., that the glint and glare effects are acceptable providing there is found to be no more than a low potential for after-image (i.e., 'green glare') when assessing in accordance with the SGHAT methodology. As previously stated, the SGHAT methodology is based purely upon the intensity of the reflection and the viewing angle and is not duration-dependant.

7 METHODOLOGY

As discussed in Section 4.2.4, modelling and assessment of glint and glare effects has been conducted using software implementing the SGHAT methodology, which accounts for the following site-specific parameters:

- ◆ Light Source:
 - ◇ Solar irradiance based on the geographical location of the array, and the sun's position in the sky in 1-minute intervals throughout the year.
- ◆ Reflection Source:
 - ◇ Latitude, longitude and elevation of the Proposed Development;
 - ◇ Panel tilt, height, and azimuth (orientation relative to north); and
 - ◇ Panel technology (fixed / tracking, and presence of anti-reflective coatings);
- ◆ Propagation path:
 - ◇ Local terrain; and

⁹ As defined in UK Government (2016) 'town and country planning (safeguarded aerodromes, technical sites and military explosives storage areas)',

- ◇ Existing or proposed obstructions (e.g., forestry, non-sensitive buildings, etc.)
- ◆ Receptor:
 - ◇ Receptor type e.g. (dwelling, road, rail, flight path, ground-based aviation assets);
 - ◇ Receptor location;
 - ◇ Height above ground level is typically taken as 2 m for terrestrial receptors, except in the following cases: 2.75 m for rail, 2.25 m for roads, and structures such as Air Traffic Control Towers (ATCT), which are modelled on a case-by-case basis;
 - ◇ A pupil diameter of 2 mm, focal length of 17 mm, and an ocular transmission coefficient 0.5; and
 - ◇ Viewing angle and direction of travel (mobile receptors only).

7.1 IDENTIFICATION OF RECEPTORS

Figures 1 and 2 present small and large scale maps respectively, showing the Proposed Development boundary and the study areas applicable to this assessment.

7.1.1 Receptors Scoped into Assessment

As shown in Figure 1, there are no safeguarded airports within the 13 km study area. However, one non-safeguarded airfield, Graveley Hall Farm, lies within the 5 km study area and has therefore been included in the assessment. This private airfield features a single 430 m grass runway and does not have an Air Traffic Control Tower (ATCT).

The residential receptors identified for assessment comprise three dwellings located to the east of the Development, as shown in Figure 2. Each receptor has been assessed using online mapping and aerial imagery, with consideration given to screening from local terrain, vegetation, and surrounding buildings or infrastructure. These features have been included in the modelling where relevant.

The A507 runs along the northeast boundary of the Development, and all sections of this road within the 500 m study area have been included in the assessment, as identified in Figure 2, Appendix 2. Minor roads within the study area are unclassified and primarily serve as access routes; they have not been included in the assessment, as discussed in Section 5.2.

7.1.2 Receptors Scoped out of Assessment

As shown in Figure 2, no railway infrastructure has been identified within the respective study areas; therefore, railway-related receptors have been excluded from the assessment.

7.2 METROLOGICAL FACTORS

For much of the year, weather conditions lack bright sunshine, minimizing potential glint and glare effects. The nearest Met Office weather station to the Development is in Rothamsted¹⁰, approximately 23 km to the southwest of the Development. According to the Met Office, the average sunshine duration recorded at this station during the period where glint and glare effects have been predicted (March to October) is approximately 1,357 hours, 38% of the total daylight hours during the same period. This has been accounted for as shown in Table 1, overleaf.

¹⁰ <https://www.metoffice.gov.uk/research/climate/maps-and-data/location-specific-long-term-averages/gcpwxyfx>

8 ASSESSMENT OF IMPACT

Tables 1 and 2 present a summary of the results of the modeling exercise. Table 1 presents the theoretical maximum annual glare duration for each residential dwelling located within the study area, assuming continuous sunshine during daylight hours, and the likely values after accounting for the percentage of sunshine as described in Section 7.2.

Table 1: Residential Assessment Results

Receptor	Daily Maximum Glare Duration (mins)	Theoretical Maximum Annual Glare Duration (mins)				Likely Annual Glare Duration (mins)			
		Green Glare	Yellow Glare	Red Glare	Total	Green Glare	Yellow Glare	Red Glare	Total
OP1	0	0	0	0	0	0	0	0	0
OP2	0	0	0	0	0	0	0	0	0
OP3	0	0	0	0	0	0	0	0	0

As Table 1 shows, due to no line of sight, none of the properties within the respective study area are predicted to experience glint and glare effects. Effects on the residential receptors are therefore acceptable in accordance with the relevant guidance and no specific mitigation is required.

Table 2 below shows the assessment results for transport receptors (i.e. road and aviation) taking into account the proposed landscaping measures outlined in section 2.

Table 2: Route Assessment Results

Receptor	Predicted Glint and Glare Impact (with Mitigation)
FP1 – Graveley (01)	No Glare
FP2 – Graveley (19)	No Glare
Route: A507	Low potential for temporary after image

The results of the modelling process show that glint and glare effects are low intensity 'green' glare on the A507, which is acceptable in terms of the criteria set out in Section 6.

For those receptors where potential effects have been predicted, detailed result charts are presented in Appendix 3.

9 CUMULATIVE EFFECTS

For receptors where the assessment criteria are based solely on ocular impact (i.e. road, rail, and aviation receptors), any cumulative glare effects would require that glare from both developments occur simultaneously, at the same point along the route, and within the same field of view. In practice, there is no reasonable prospect of this occurring. As such, cumulative effects for these receptors have been scoped out of the assessment.

Notwithstanding the above, cumulative effects are a consideration for receptors where the total duration is a factor (i.e. residential dwellings), as other sources of glare may increase the overall duration that glare effects are experienced, if they occur at different times.

The potential for cumulative impacts is therefore limited to receptors within the area where a cumulative development's 200 m study area overlaps with that of the Development.

A separate solar farm development, Beane Solar Farm (application reference: 3/24/2245/FUL), is currently proposed for neighbouring fields located to the south-east of the Development. No receptors are located within 200 m of both Beane Solar Farm's PV array and the Development's PV array. As such, there is no prospect of unacceptable cumulative impacts occurring.

10 CONCLUSION

Metrica was commissioned to undertake a Glint and Glare impact assessment in relation to the proposed Westfield Energy Conservation Park.

The assessment has been undertaken in accordance with best practice guidance. No glare has been predicted for residential and aviation receptors, and no rail receptors have been identified within the respective study area.

While some limited low intensity 'green' glare is predicted on the A507 northeast of the Site, extensive landscaping and forward planting ensures the glare is acceptable in terms of the criteria set out in Section 6.

The Development is therefore acceptable in terms of glint and glare.

11 GLOSSARY OF TERMS

After-Image: An image that continues to appear in the eyes after exposure to the original image has ceased.

Axis Tracking: Motorised PV array modules which are able change their tilt and / or azimuth angle in order to face the sun as it tracks across the sky.

Azimuth: A direction or bearing defined a horizontal angle between 0° and 359° measured clockwise from North.

Elevation: height above mean sea level.

Elevation Angle: An angle that is formed between the horizontal line (0°) and the line of interest.

Field of View: The angular extent of the observable world that is seen at any given moment. For the assessment of glint and glare effects, this is typically taken as being 50° either side of the direct line of sight.

Glare: A continuous source of bright light typically received by static receptors or from large reflective surfaces.

Glare Hazard Plot: A graphical representation ocular impact as function of retinal irradiance and subtended source angle.

Glint: A momentary flash of bright light typically received by moving receptors or from moving reflectors.

Green Glare: Glare predicted with a low potential for temporary after-image.

Local Road: Smaller 'C' or Unclassified roads, often linking a housing estate or a village to the rest of the network, and all roads within residential areas unless specifically classified otherwise.

National Road: 'A' Roads or Motorways, typically with a speed limit of up to 60mph or 70mph, intended to provide large-scale transport links within or between geographical areas.

Ocular Impact: In this context, ocular impact is a function of retinal irradiance and subtended source angle, as plotted on a Glare Hazard Plot.

Receptor: In this context, a receptor is a potential viewer of glint and glare effects, either static or mobile.

Red Glare: Glare predicted with a potential for permanent eye damage (retinal burn),

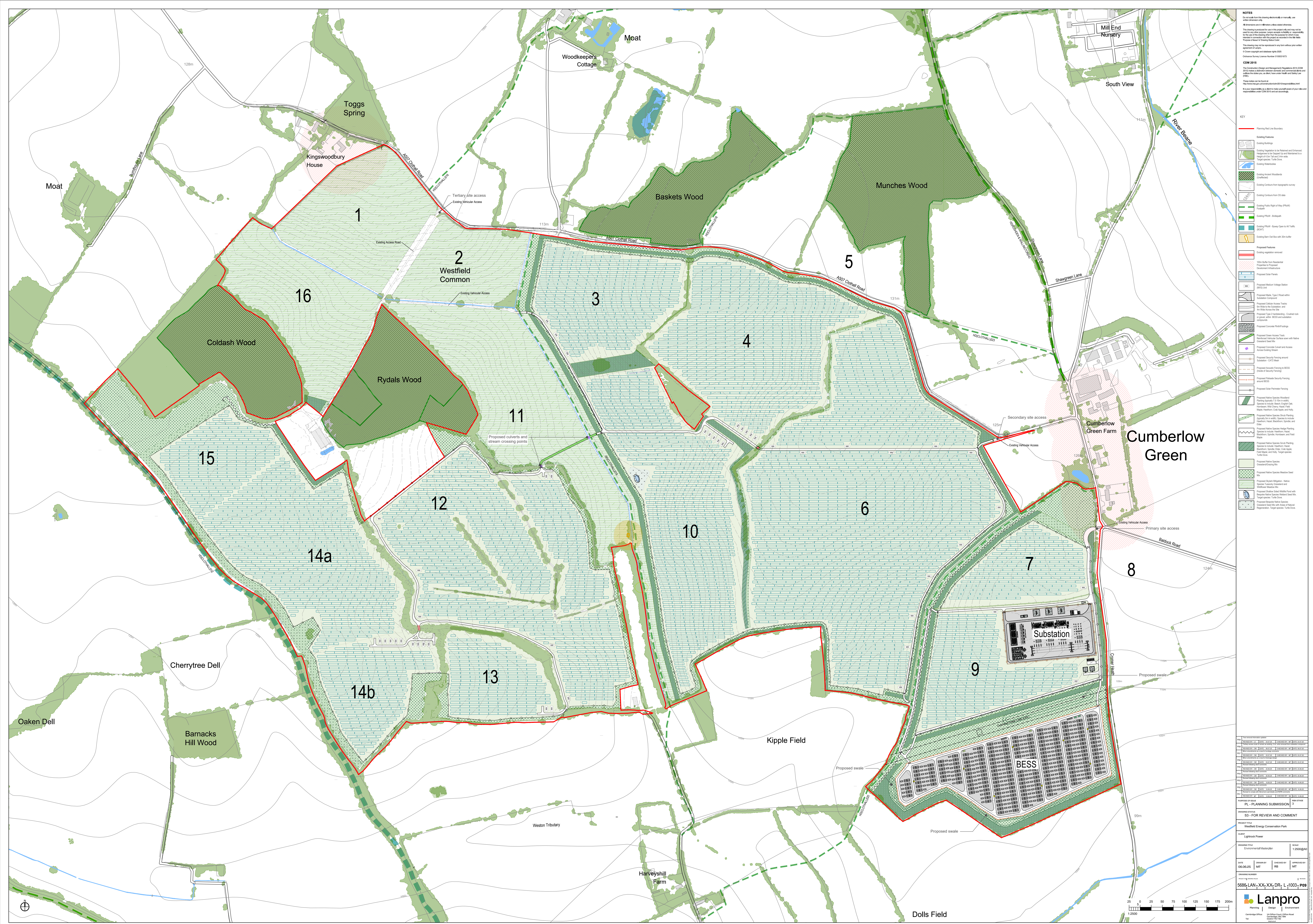
Regional Road: Typically classed as 'B' roads in the UK, intended to connect different areas, and to feed traffic between A roads and smaller roads on the network.

Retinal Irradiance: The amount of light or other radiant energy striking the retina, measured in watts per cm²

Subtended Source Angle: The subtended source angle is the angle formed by hypothetical lines projecting from the eye to the top and bottom (or left and right sides) of a source of glare. The subtended source angle therefore represents the size of the glare viewed by an observer.

Yellow Glare: glare predicted with a potential for temporary after-image.

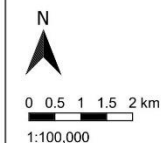
APPENDIX 1: DEVELOPMENT LAYOUT



APPENDIX 2: FIGURES

- Development Boundary
- 13 km Safeguarded Aviation Study Area
- 5 km Non Safeguarded Aviation Study Area
- PV Array Areas
- ✈ Airfields

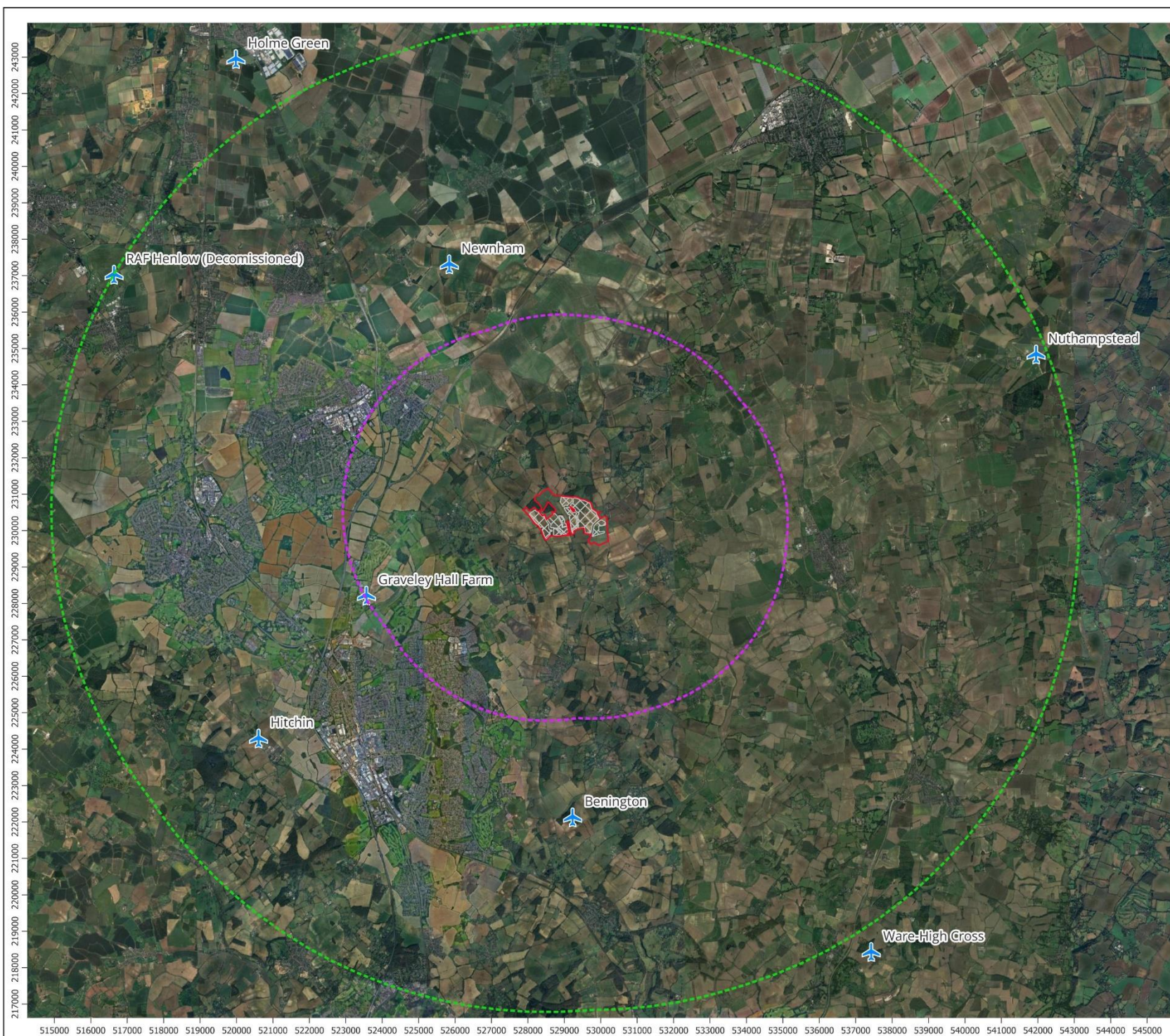
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Figure 1
Aviation Study Areas

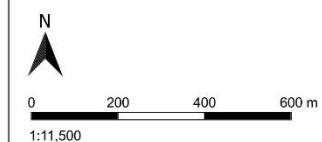
Westfield Energy Conservation Park
Glint and Glare





- Development Boundary
- 500 m Road/Rail Study Area
- 200 m Residential Study Area
- PV Array Areas (as per model)
- Assessed Road (A507)
- ◆ Assessed Receptors

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Figure 2
Receptor Study Areas

Westfield Energy Conservation Park
Glint and Glare

APPENDIX 3: DETAILED RESULTS

A3.5: Predicted Effects from array PV1 at A507 (WITH MITIGATION)

Chart A3.5.1: Times of Glare (GMT)

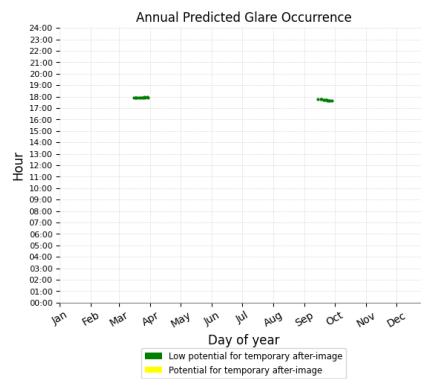


Chart A3.5.2: Source of Glare

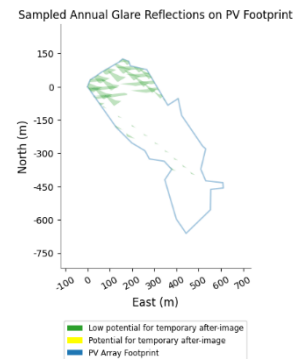


Chart A3.5.3: Position on Path Receiving Glare

