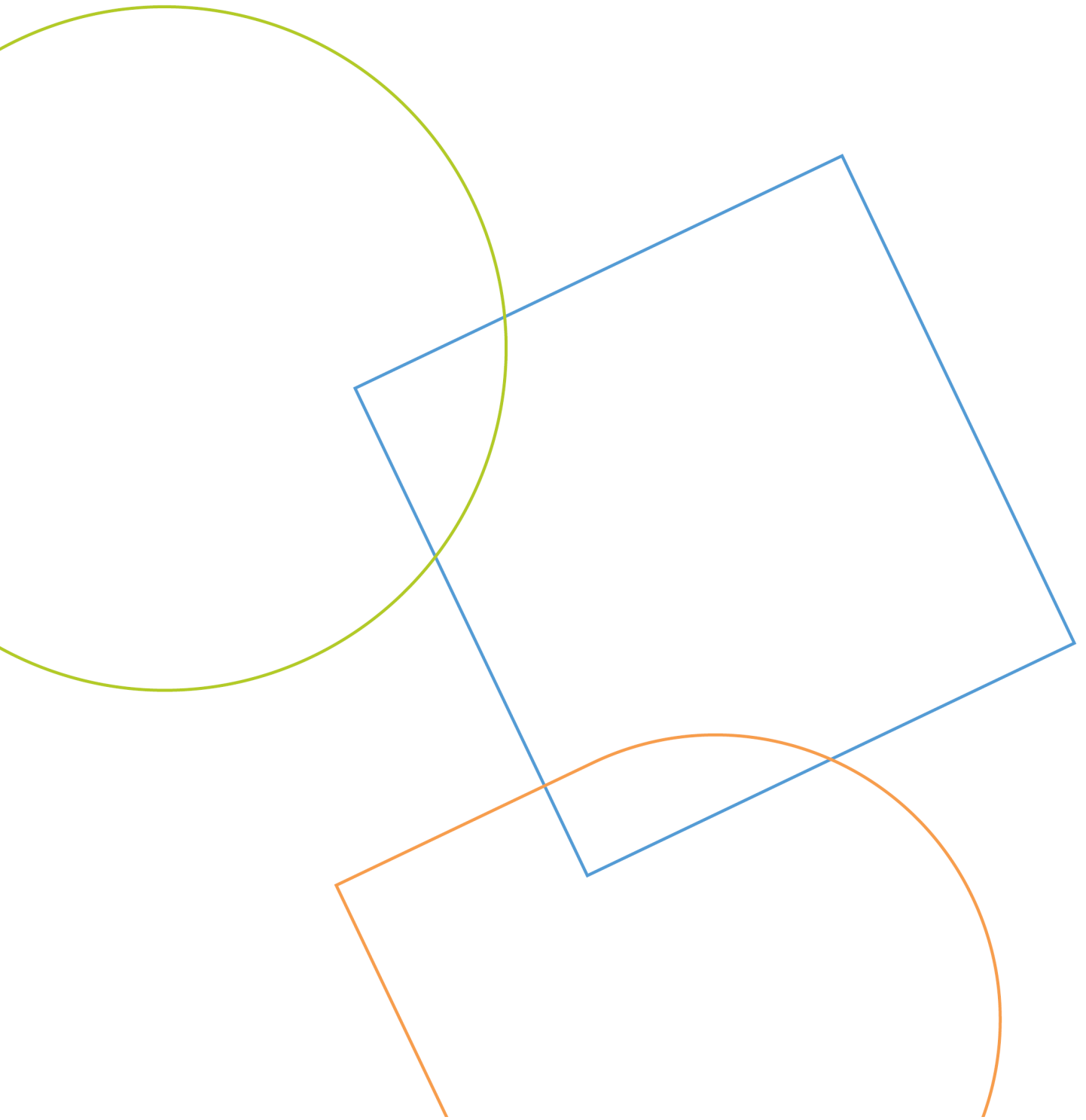




Westfield Energy Conservation Park
Planning, Design and Access Statement



Planning, Design and Access Statement

Westfield Energy Conservation Park

Lightrock Power Limited



July 2025

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Planning Statement

Westfield Energy Conservation Park

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1 Introduction

- 1.1.1 Lanpro Services Limited ('Lanpro') has been appointed by Lightrock Power Limited ('the Applicant'), to prepare a Planning, Design and Access Statement to accompany a full planning application for Westfield Energy Conservation Park which incorporates a Battery Energy Storage System (BESS), co-located ground-mounted solar farm, associated infrastructure, access, biodiversity enhancements and landscaping (the 'Proposed Development') on land south of A507 at Westfield Common, Hertfordshire ('the Site'). The Site is within the jurisdiction of North Hertfordshire District Council ('the Council').
- 1.1.2 The Proposed Development is described in full in section 4 of this document. The application is also accompanied by an Environmental Statement which this document should be read in conjunction with.
- 1.1.3 The Proposed Development would generate up to 99.9MW of electricity from a renewable source and so it would assist the Government in meeting its targets to decarbonise our electricity supply and reduce overall carbon emissions.
- 1.1.4 The Government is committed to allowing larger scale solar farms through the Town and Country Planning Act (TCPA) route through the proposed changes being brought in via the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025 which will allow (amongst other things) up to 100MW solar schemes to be built without the need for a Development Consent Order (DCO) under the Planning Act 2008. The background to this change includes acknowledging that advances in renewables technology means that larger schemes are now possible without increasing the development envelope. This is because the technology can generate much more over the equivalent footprint when the original 49.9MW cap was introduced. The change will come into effect from the 31st December 2025 and will mean that projects consented under the Town and Country Planning Act (TCPA) can proceed without a DCO provided they are 99.9MW or below.
- 1.1.5 A DCO is only required to allow implementation ('construction') of a scheme above the threshold under the Planning Act 2008. The Act does not prevent a person from applying for planning permission under TCPA for a scheme of 50MW or greater and obtaining such a planning permission lawfully.
- 1.1.6 Therefore, the legal position of the Applicant, supported by advice obtained by the Applicant and shared with the Council, is that a TCPA application for a scheme of up to 99.9MW can be submitted and determined prior to 31st December 2025 by a Local Planning Authority and then can be implemented without the need for a DCO from the 31st Dec 2025 when the change comes into effect through the Infrastructure Planning (Onshore Wind and Solar Generation) Order 2025.
- 1.1.7 The reliability, cost and flexibility of the supply of energy in the UK is recognised by the Government as being of national strategic importance, supporting the Government's aims to reach net zero carbon emission by 2050 and to enhance the energy security of the UK in the face of increasing international instability, with energy supply manipulation being increasingly used as a weapon of war.

- 1.1.8 The Government expects large scale solar generation to make an important contribution to achieving its objectives for the UK's power system which are to ensure the supply of energy always remains secure, reliable, affordable, and enables the UK to meet its carbon emission reduction commitments. These include the achievement of net zero carbon emissions by 2050 and delivery of carbon budgets in the intervening years.
- 1.1.9 In addition, with the publication of the governments Clean Power Action Plan in December 2024, which sets out a pathway to a clean power system by 2030, the goal is to reduce the carbon intensity of the UK's energy generation from 171gCO₂e/kWh in 2023 to well below 50gCO₂e/kWh in 2030.¹
- 1.1.10 The Clean Power Action Plan highlights the importance of moving away from fossil fuels and increasing the UK's domestic supply of clean energy stating:
- 1.1.11 *"In an increasingly unstable world, our dependence on fossil fuels leaves us deeply vulnerable as a country – and that is true no matter where they come from."*
- 1.1.12 The Proposed Development will assist the government in meeting these targets. The Action Plan goes on to emphasise the underpinning role of battery storage and other technologies providing short-duration flexibility for the National Grid, stating:
- "As we build an energy system reliant increasingly on variable renewables, improving the flexibility of the wider electricity system is key."*
- 1.1.13 The Action Plan references a variety of meaningful advantages associated with increasing battery storage capacity in the UK including: reducing energy bills for consumers, minimising the amount of more costly generation and associated network infrastructure that needs to be built, and maintaining security of supply.
- 1.1.14 The Department of Energy Security and Net Zero (DESNZ) expects 23-27 GW of battery storage to be needed by 2030 to support clean power generation. With a current battery storage capacity of 4.5GW, a significant increase in capacity is required, with DESNZ expecting most of this to come from grid-scale batteries such as the Proposed Development. Battery capability is therefore an essential enabler and provides crucial grid balancing services to support the growth of renewable energy generation in the UK through increasing the capacity of the National Grid that is available to store such energy, which can be intermittent.

1.2 Structure of Statement

- 1.2.1 This Planning, Design and Access Statement ('Statement') is arranged as follows:
- **Section 2:** Provides a description of the Site context including designations, and relevant planning history;

¹ Department for Energy Security and Net Zero, 'Clean Power 2030 Action Plan', December 2024 (<https://www.gov.uk/government/publications/clean-power-2030-action-plan>)

- **Section 3:** Summarises the pre-application engagement undertaken to inform the design, along with how this been considered in the design;
- **Section 3:** Describes the Proposed Development;
- **Section 4:** Outlines the planning policy context;
- **Section 5:** Provides an assessment of the Proposed Development against the prevailing planning policy context;
- **Section 6:** Summarises and concludes this Statement.

1.3 Application Submission

- 1.3.1 This Statement should be read in conjunction with the following documents and drawings submitted as part of this planning application:

Table 1.1: Planning Application Submission

Document / Drawing	Author	Reference / Date
Application Forms, Certificates	-	-
Covering Letter	Lanpro	July 2025
Drawings • Location Plan • Site Layout • Environmental Masterplan • Site Layout - BESS • Site Layout - Substation • Substation Elevations • Cat2 Mesh Substation Security Gates • Cat2 Mesh Substation Fencing • Battery Unit • Medium Voltage Station (MVS) • CCTV • Palisade Fencing & Gates • Access Tracks • Spares Container • Acoustic Fencing • Water Tank - 228,000L capacity • Statcom Building • LV Units • Harmonic Filter with Housing	Lanpro	5686_LPR_ZZ_XX_DR_Z_PLA_0069 5686-LAN-XX-XX-DR-L-1002-P09 5686-LAN-XX-XX-DR-L-1003-P09 5686-LAN-XX-XX-DR-L-1004-P06 5686-LAN-XX-XX-DR-L-1005-P07 5686-LAN-XX-XX-DR-L-3001-P02 5686-LAN-XX-XX-DR-L-3002-P02 5686-LAN-XX-XX-DR-L-3003-P02 5686-LAN-XX-XX-DR-L-3004-P03 5686-LAN-XX-XX-DR-L-3005-P02 5686-LAN-XX-XX-DR-L-3006-P03 5686-LAN-XX-XX-DR-L-3007-P01 5686-LAN-XX-XX-DR-L-3008-P03 5686-LAN-XX-XX-DR-L-3009-P03 5686-LAN-XX-XX-DR-L-3010-P03 5686-LAN-XX-XX-DR-L-3011-P03 5686-LAN-XX-XX-DR-L-3012-P01 5686-LAN-XX-XX-DR-L-3013-P01 5686-LAN-XX-XX-DR-L-3014-P02

Document / Drawing	Author	Reference / Date
- Relay and Control Rooms - 400kV Substation 33kV Metered Switchroom - 400kV Substation - Aux Transformers - Solar Panels - Solar Perimeter Fence - Gate in Solar Perimeter Fence - Welfare Facilities - Operations Office - Control Room		5686-LAN-XX-XX-DR-L-3016-P03 5686-LAN-XX-XX-DR-L-3017-P02 5686-LAN-XX-XX-DR-L-3018-P02 5686-LAN-XX-XX-DR-L-3019-P02 5686-LAN-XX-XX-DR-L-3020-P05 5686-LAN-XX-XX-DR-L-3021-P02 5686-LAN-XX-XX-DR-L-3022-P01 5686-LAN-XX-XX-DR-L-3023-P01 5686-LAN-XX-XX-DR-L-3024-P01
Planning, Design and Access Statement	Lanpro	Version 1.2 July 2025
Statement of Community Involvement	Lightrock	July 2025
Environmental Statement: Volume 1 – Main Report Volume 2 – Appendices Volume 3 – Non-Technical Summary	Lanpro	Version 1 July 2025
Agricultural Land Classification Report	Amet Property	2 July 2025
Ecological Impact Assessment (Redacted)	Lanpro	V1 – 2 July 2025
Biodiversity gain plan form	Lanpro	4 July 2025
Statutory Biodiversity Metric	Lanpro	4 July 2025
Arboricultural Impact Assessment	Lanpro	V1 – 2 July 2025
Glint and Glare Assessment	Metrica	Version 1 – July 2025
Geoenvironmental Desk Study Report	JPG	6437-JPG-XX-XX-RP-G-0601-S2-P02
Historic Environment Desk-Based Assessment	Lanpro	V2 – June 2025
Transport Statement	Andrew Moseley Associates	Revision 2 – July 2025
Construction Traffic Management Plan	Andrew Moseley Associates	Revision 2 – July 2025
Noise Impact Assessment	Metrica	Version 1 – July 2025
Flood Risk Assessment and Sustainable Drainage Strategy	JPG	6437-JPG-XX-XX-RP-D-062X-S2-P07
Outline Battery Safety Management Plan	Abbott Risk Consulting Ltd	Issue 1 – July 2025

2.1.3 Immediately north of the Site is the A507 with agricultural fields, woodland and a farm beyond. Mill End Plants and Café, and the village of Rushden, are situated approximately 1km to the northeast. The Site is immediately west of an unnumbered classified road named Cromer Heath, southwest of Cumberlow Green and further agricultural fields. To the south of the Site are agricultural fields and woodland along with the River Beane and

the Weston Tributary approximately 0.25km south. To the west of the Site are a number of residential properties, agricultural fields and woodland.

- 2.1.4 The Site is located wholly within the North Hertfordshire District Council, although it abuts the East Hertfordshire District Council boundary on its eastern edge.
- 2.1.5 The Site is situated southwest of the village of Cumberlow Green, approximately 3km northeast of Stevenage. Letchworth Garden City is located approximately 3.7km northwest.
- 2.1.6 The surrounding area of the Site is largely rural with a number of villages including:
- Shaw Green approximately 1.2km north;
 - Rushden approximately 1km northeast;
 - Southern Green approximately 1.6km northeast;
 - Cottered approximately 1.3km east;
 - Hare Street approximately 1.25km southeast;
 - Cromer approximately 1.2km south;
 - Luffenhall approximately 0.65km south;
 - Halls Green approximately 1.3km southwest;
 - Warren's Green approximately 2.15km southwest;
 - Weston approximately 1.4km west; and
 - Clothall approximately 1.25km northwest.

2.2 Environmental Baseline Conditions

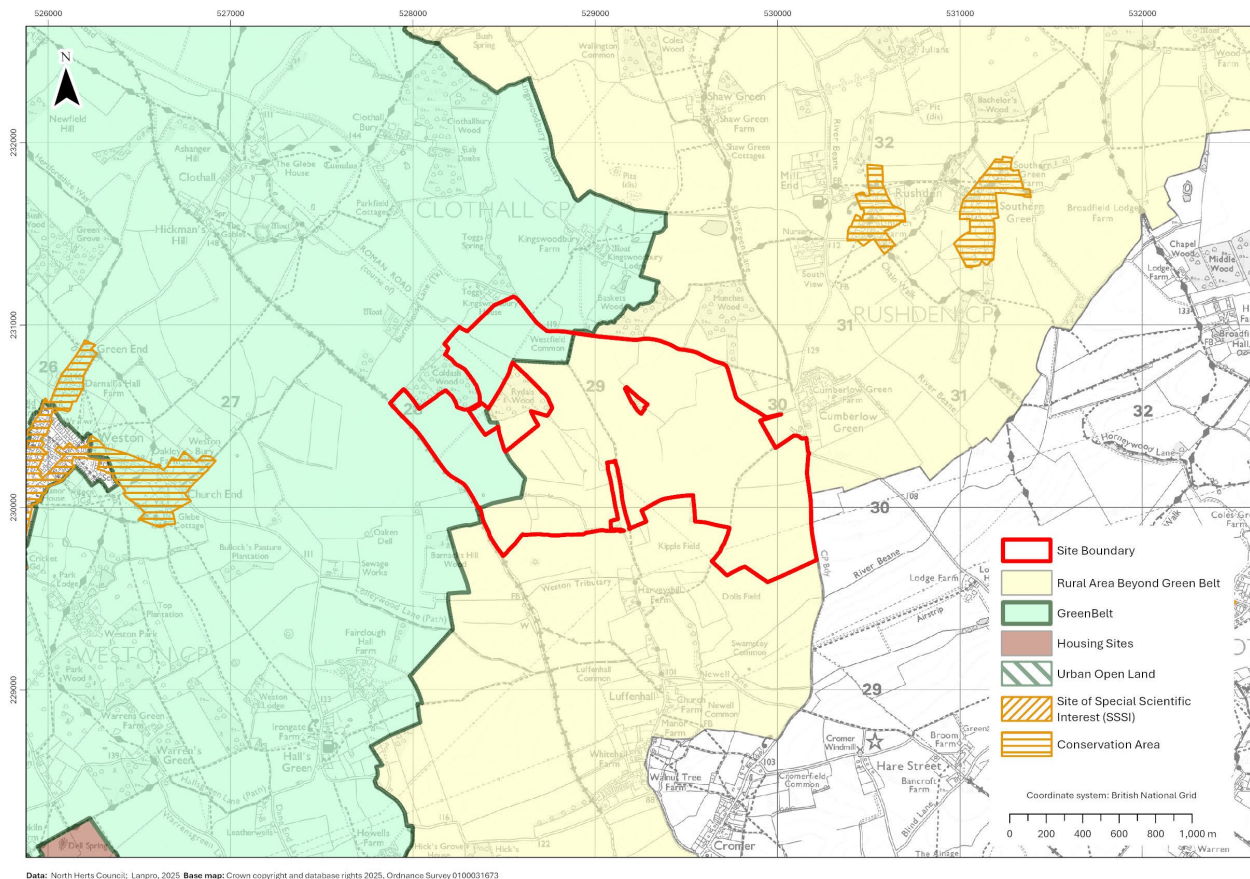
- 2.2.1 There are no known ecological designations associated with the Site. The nearest statutory designated site comprises Moor Hall Meadows Site of Special Scientific Interest (SSSI) approx. 3.7km southeast. Other designations in the surrounding area include Hill Local Nature Reserve (LNR) approx. 3.8km northwest, and Blagrove Common SSSI approx. 3.9km northeast.
- 2.2.2 The Site is not within a National Park or National Landscape Area. It is classified as being within the South Suffolk and North Essex Clayland National Character Area of the East Anglian Plain.
- 2.2.3 There are a number of parcels of ancient and semi-natural woodland and ancient replanted woodland in the vicinity of the Site, including Rydal's Wood and Coldash Wood, which are located adjacent to the Site (offset with a 15m development buffer). There are also a number of parcels of ancient woodland in the surrounding area of the Site, including Munches Wood and Baskets Wood ancient and semi-natural woodland directly north of the Site, but separated from the Site by the A507.

- 2.2.4 The Site is predominantly within Flood Zone 1, with areas of Flood Zone 2 and 3 located through the central section of the Site and which branch off east and west from the central swathe (associated with unnamed watercourse). The areas in Flood Zone 2 and 3 will not house any electrical infrastructure. There are also areas of high and low surface water flood risk.
- 2.2.5 There are no designated heritage assets on the Site; Cumberlow Manor House Scheduled Monument is situated directly northeast of the Site, beyond the A507. Within 1km of the Site, there are two additional Scheduled Monuments: the Lammas Field Roman Villa approx. 610m to the northwest and the Enclosure and Earthworks southeast of Clothallbury House approx. 745m to the north.
- 2.2.6 Further to the above, there is one Grade II* and 25 Grade II listed buildings within 1km of the Site. The Grade II* listed Cromer Windmill is located approx. 1km to the south of the Site.
- 2.2.7 The Historic Environment Desk-Based Assessment (Lanpro, June 2025) which is supported by a geophysical survey identifies that there is potential for below-ground archaeological remains from the prehistoric, Roman, medieval, and post-medieval periods to be present within the Site. These include anomalies that are likely to represent settlement evidence, including enclosures, field systems and ring-ditches potentially dating to the Iron Age and/or Roman periods. These features are located in proximity to the conjectured line of the Baldock to Braughing Roman Road, as well as an area where a Late Bronze Age hoard and Roman finds have been recorded, further suggesting an increased likelihood of archaeological survival.
- 2.2.8 Two Public Rights of Way (PRoW) (HD|CLOTHALL|019 and HD|CLOTHALL|020) cross the Site from east to south and north to south. There are various other PRoWs, and a national cycle network in the immediate surroundings of the Site.
- 2.2.9 The Applicant has undertaken Agricultural Land Classification testing of the Site which has determined that the Site is in its majority Grade 3b or lower (61.9%). Approximately 38.1% of the Site is located on Best and Most Versatile (BMV) land (Grades 2 and 3a).

2.3 Planning Policy Designations

- 2.3.1 The majority of the Site is situated within the Rural Area beyond the Green Belt (yellow shading) as defined in North Hertfordshire District Council Local Plan 2011 – 2031 Policies Map. Part of the northwest of the Site is within the Green Belt (green shading). An extract of the Policies Map is provided in Figure 2.2.

Figure 2.2: Policies Map Extract



2.3.2 There are no designations on the Site within the Minerals and Waste Local Plan Policies Map (October 2024).

2.4 Planning History and Other Relevant Developments

2.4.1 A search of the North Herts and East Hertfordshire District Council planning maps search was undertaken on 2 July 2025.

2.4.2 The only planning permissions associated with the Site relate to Munches Farm:

- Ref. 91/00224/1 - Agricultural grain store building. Appeal dismissed 13 May 1991.
- Ref. 97/00019/1 - Erection of cattle shed (design, external appearance and landscaping reserved). Approved 28 February 1997.
- Ref. 24/00096/FP - Single storey side extension of existing agricultural shed for housing of grainstore generator and extension of grainstore apron. Approved 10 April 2024.

2.4.3 Due to the extent of the Site, major applications of 50+ dwellings have been accounted for and other developments of relevance within 5km of the Site, which would be considered cumulatively in any future application.

2.4.4 The search identified the following development under consideration that may result in cumulative impacts with the Proposed Development.

- Beane Solar Farm, Ref. 3/24/2245/FUL - Installation and operation of a solar farm including co-located energy storage facilities, onsite substation, ancillary infrastructure and landscaping at Land to the West of the A507 between Cottered and Cromer, Hertfordshire, SG9 9PU. Awaiting decision (validated: 20 December 2024).

The proposed Beane Solar Farm is directly southeast of the Site.

3 Pre-Application Engagement

- 3.1.1 As part of the design process, Lightrock has been committed to engaging with the Council, which is the Local Planning Authority (LPA), local community and key stakeholders to ensure that views are heard and considered and any issues are resolved.
- 3.1.2 A summary of pre-application engagement, feedback received and how the Project Team have incorporated these comments into the design is set out below. Please refer to the Statement of Community Involvement (Lightrock) for further detail.

3.2 North Herts

- 3.2.1 The Applicant submitted a pre-application submission to the Council on the 11th February 2025 and a response was received on the 24th June 2025. During the consideration of the pre-application submission the Applicant undertook the following meetings and interactions:
- Continuous dialogue with the appointed planning officer (Peter Bull);
 - A meeting with the Hertfordshire County Council Ecologist on the 3rd June 2025;
 - A meeting with the Council landscape consultant (Place Services) on the 13th June 2025; and
 - Ongoing dialogue with Hertfordshire County Council Archaeologist throughout the period.
- 3.2.2 An Environmental Impact Assessment (EIA) Screening Opinion request was submitted to the Council on 20th February 2025 (Ref. 25/00446/SO) to confirm whether the Proposed Development requires an EIA. The screening opinion was adopted by the Council on 24th June 2025 and determined to be EIA Development for the purposes of the Town and Country Planning (Environmental Impact Assessment) Regulations 2011, as amended ('the 2011 EIA Regulations').
- 3.2.3 The Applicant has not submitted an EIA scoping opinion to the Council as it was considered that due to the information provided in the Screening Opinion (confirming that Landscape was the only likely significant environmental effect) and the ongoing dialogue between the Applicant, the planning officer and the Council's appointed landscape consultant, there was no need for this to take place as the scope and extent of the Applicant's assessment would be sufficient to meet the requirements needed in the Environmental Statement. There is no legislative requirement for the Applicant to submit a scoping opinion under the Town and Country Planning (Environmental Impact Assessment) Regulations 2011.
- 3.2.4 Comments received from throughout the pre-application submission and the EIA screening opinion have been incorporated into the proposals set out in this planning application submission.

3.3 Local Residents

- 3.3.1 The Site has relatively few close neighbours, so the Applicant sought early and meaningful engagement with these households in advance of any wider consultation activity.
- 3.3.2 Chris Sowerbutts, founder of Lightrock Power, sent an introductory letter to the twelve properties in the immediate vicinity of the Site on 29th January 2025. The letter comprised:
- A site plan with numbered fields;
 - The opportunity to provide input into location of solar panels, BESS units, and wildlife enhancement areas;
 - A request for local knowledge on flora and fauna in the area;
 - An Invitation to meet with Chris on 5th February 2025; and,
 - Chris's personal contact details.
- 3.3.3 Three neighbours responded to the letter, with two being able to meet on the 5th February 2025, and one remaining in contact via email.
- 3.3.4 Chris Sowerbutts and Andy Fewings (Head of Development) visited the two neighbours at their houses. Discussion topics included:
- Particular fields to be used;
 - Noise pollution;
 - Light pollution;
 - Local roads, particularly in reference to weight limit, tight bends, and localised congestion;
 - Water contamination;
 - Access to bridleways; and
 - Muntjac and Roe Deer, Red Kite, Stoat, Water Vole, Swift, Sparrowhawk, Buzzard, Wren, Badger, Fox, Bats.
- 3.3.5 One neighbour requested a visual representation of how the Proposed Development may look from their window. This was commissioned by Lightrock Power and provided to the neighbour.

3.4 Elected Representatives

- 3.4.1 Elected representatives were sent an introductory email on 18th February 2025. This outlined the project and the consultation process and offered a briefing so that they could prepare themselves for any questions that they might be asked during the consultation.
- 3.4.2 The MP for North East Hertfordshire (Chris Hinchliff) replied with some concerns about the consultation process and the Applicant replied to set out the methods of consultation they would be undertaking to consult with the local community ahead of submission and

confirmed they were already on contact with the closest neighbours. It was highlighted that Lightrock Power's consultation was designed to go above and beyond the expectations laid out on the Council's standards.

3.4.3 The Applicant did not receive a reply from any other ward members that time.

3.5 Public Consultation

3.5.1 The consultation was launched on 25th February 2025 and ran until 28th March 2025. The elected representatives were contacted again, and a postcard, press release and press advertisement were issued to inform the wider community.

3.5.2 A public exhibition was held at Rushden Village Hall on Tuesday 18th March 2025 from 3pm-7pm. Ten representatives of Lightrock Power were in attendance, including Co-Founder, Chris Sowerbutts, Head of Development, Andy Fewings, and experts in Landscape, Ecology, Transport, and Heritage, among others.

3.5.3 The event was well attended, with a steady flow of guests throughout the day. In total, Lightrock Power and its representatives spoke to 68 attendees. This included a mixture of neighbours, politicians (including Cllr Steve Jarvis), and others with a local interest. Topics discussed included:

- Local scheme being proposed by another developer;
- Visual impact;
- Local deer population;
- Who are Lightrock Power?;
- Long term project ownership;
- Botany;
- Cumulative impact;
- Noise;
- Scepticism about BNG;
- Agricultural Land Classification;
- Footpath accessibility;
- Transport routes; and
- Archaeology.

3.5.4 A webinar was held on 25th March 2025 and ran from 6pm-7pm. The Webinar had been publicised via the project website, postcard, and press advert, as well as in the consultation launch email, received by the Key Stakeholders. Five attendees had registered to attend, but only two attendees joined on the day. Two project representatives were in attendance.

- 3.5.5 An anonymous survey was available throughout the consultation period and received 16 responses. 13 responses were received via the Survey Monkey website, two paper copies were handed over at the exhibition event, and one sent via email.
- 3.5.6 12 (80% of) respondents felt that it's important for grid operators to keep the electricity network safe and reliable, and 11 (73%) were in favour of modernising the electricity network, while only 3 (20%) felt that solar was a good option for this area.
- 3.5.7 Only one respondent offered a suggestion for the community benefit fund – Beane Valley Chalk Streams.
- 3.5.8 Respondents appreciated:
- Well screened;
 - Biodiversity gains; and
 - Sustainability is at the front of Lightrock Power's mind.
- 3.5.9 Respondents had concerns about:
- Reduction of agricultural land use;
 - Visual impact;
 - Procurement;
 - Brownfield sites or roofs might be more appropriate;
 - Biodiversity; and
 - Impact on the local community.
- 3.5.10 The largest proportion of respondents - 11 (69%) - had heard of the project through a local community website/social media. 12 (80% of) respondents had local postcodes. All but one respondent claimed to be a local resident, local business, or local councillor. 3 (19% of) respondents were in favour of the Proposed Development.

4.1.3 By importing excess electricity from the grid and storing it, batteries can capture energy (particularly from renewables like the co-located solar) that would otherwise be lost/unutilised, releasing this during peak demand or when a renewable energy source is not generating. Batteries therefore play a key role in delivering the transition to renewable energy.

- 4.1.4 As the UK electricity network is interconnected, problems in one geographic location can have far reaching implications on the electricity network. Subsequently, BESS offers additional capacity to deal with system stress and variations in grid frequency at both a local and national level.
- 4.1.5 The Proposed Development will provide essential energy infrastructure to support the growth of renewable energy generation in the UK by increasing the capacity of the National Grid that is available to store such renewable energy, which can be intermittent. The Proposed Development will therefore further aid the advancement of local and national renewable energy and carbon reduction policies and objectives.
- 4.1.6 The Site has been subject to a comprehensive set of environmental surveys and assessments which have been used to refine the layout design. The design has evolved to avoid potentially significant environmental effects and incorporate feedback from both the pre-application submission and the community consultation process.
- 4.1.7 The Proposed Development will broadly comprise of the following:
- A BESS compound;
 - A substation compound;
 - Solar photovoltaic (PV) panels;
 - Associated infrastructure such as Medium Voltage Stations (MVS), welfare facilities, operational rooms and storage containers;
 - Water tanks;
 - Car parking;
 - Fencing;
 - CCTV;
 - Highway site accesses;
 - Access tracks; and
 - New landscaping and ecological enhancements.
- 4.1.8 Further detail on each of these elements is set out in the following sections.

4.2 Battery Storage

- 4.2.1 The BESS will be located within a compound in the southeast part of the Site. The compound measures approximately 500m by 180m and covers an area of approximately 6.9 hectares.
- 4.2.2 The layout of the BESS compound is shown in drawing ref **5686-LAN-XX-XX-DR-L-1004-P06**.
- 4.2.3 Within the compound there are 216 groups of four battery cabinets. Each battery unit measures approximately 6.1m in length, 2.4m in width and 3.1m in height (see drawing ref

5686-LAN-XX-XX-DR-L-3004-P03). The groups of battery units are distributed according to manufacturer and fire safety guidelines.

4.2.4 Each group of four battery units is associated with a Medium Voltage Station (MVS) unit. The MVS typically includes a transformer, switchgear, and protection systems, all packaged together to ensure efficient, reliable, and safe delivery of solar energy to the grid. The MVS have dimensions of approximately 6.1m in length, 2.4m in width and 2.9m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3005-P02**).

4.2.5 Along the northern roadway within the BESS compound there are a number of ancillary buildings, including:

- 2no control rooms, with dimensions of approximately 6.2m in length, 3.2m in width and 2.8m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3024-P01**).
- A welfare facility with dimensions of approximately 6.2m in length, 3.2m in width and 2.8m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3022-P01**). This will not be permanently staffed.
- An operations office with dimensions of approximately 6.2m in length, 3.2m in width and 2.8m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3023-P01**). This will not be permanently staffed.
- 2no spares containers, with dimensions of approximately 12.2m in length, 2.4m in width and 2.8m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3009-P03**).

4.2.6 The BESS compound is surrounded on all sides by an acoustic barrier of 4m in height and by a palisade fence.

4.3 Substation Compound

4.3.1 A 400kV customer substation for the Proposed Development will be located on the eastern edge of the Site. The area provided for the substation measures approximately 200m by 120m and covers approximately 2.4 hectares.

4.3.2 The layout of the substation is shown in drawing ref **5686-LAN-XX-XX-DR-L-1005-P07**. Elevations of the substation are provided in drawing ref **5686-LAN-XX-XX-DR-L-3001-P02**.

4.3.3 The substation will include:

- 3no transformers measuring approximately 15m in length and 11m in width, with busbars of up to 12m in height (see layout and elevation drawings for the substation, referred to above);
- 2no relay and control rooms (one for outgoing and one for incoming metering), each measuring approximately 25m in length, 13m in width and 5m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3016-P03**);
- a 33kv metered switchroom measuring approximately 50m in length, 14m in width and 5m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3017-P02**);

- a Statcom building measuring approximately 16m in length, 5m in width and 5m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3012-P01**);
- 3no harmonic filters with housing, each measuring approximately 15m in length, 15m in width and 5m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3014-P02**);
- 6no aux transformers of approximately 2.7m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3018-P02**).

4.3.4 Parking will be provided within the compound for substation maintenance operatives.

4.4 Other Ancillary Infrastructure

- 4.4.1 Around the edge of each solar panel area are located a total of 46 Medium Voltage Station (MVS) units. On a solar farm, an MVS collects the electricity produced by the solar panels, transforms it to a higher voltage suitable for the grid, and safely connects and protects the solar farm's power as it flows onto the local or national electricity network. The MVTypically includes a transformer, switchgear, and protection systems, all packaged together to ensure efficient, reliable, and safe delivery of solar energy to the grid. Each MVS unit is sited on a concrete pad and measures approximately 6.1m in length, 2.4m in width and 2.9m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3005-P02**).
- 4.4.2 Immediately to the south of the substation compound, provision is made for five parking spaces for maintenance vehicles.
- 4.4.3 Also, to the south of the substation compound, there are two water tanks to provide water in case of incident within the BESS. Each water tank has a capacity of 228,000 litres and measures approximately 10m in length, 10m in width and 2.7m in height along with an attached pumphouse (see drawing ref **5686-LAN-XX-XX-DR-L-3011-P03**). These are connected to a number of hydrants located within the BESS compound.
- 4.4.4 Two LV units will be located Immediately to the north of the substation. The larger LV unit will measure approximately 5.1m in width, 4.7m in length and 4m in height. The smaller LV unit will measure approximately 2.8m in width and length, and 2.6m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3013-P01**).

4.5 Solar Panels

- 4.5.1 The solar areas comprise photovoltaic (PV) panels arranged in arrays (rows), on fixed mounted frames and secured to the ground with posts. The panels are dark in hue and are designed to maximise the absorbency of the sun's rays and minimise solar glare by incorporating an anti-glare coating. The panels will be tilted at 20 degrees from the horizontal to face south towards the sun. There is typically a distance of between 2 and 6 metres between rows of panels in order to avoid inter-panel shading, but this distance is influenced by slope and aspect, so does vary across the Site. The height of the panels above the immediate ground level will typically be a maximum of 3m, including a minimum clearance of 0.8m above the ground, depending on ground conditions, with a maximum height above ground level of 3m. Panel mounting structure can vary depending on ground

conditions and will be confirmed following detailed design prior to construction. Detail of the solar panels is provided in drawing ref **5686-LAN-XX-XX-DR-L-3019-P02**).

4.6 Fencing, CCTV and Lighting

- 4.6.1 The solar panels will be surrounded by perimeter fences enclosing one or more of the fields. Given the countryside setting of the Site, the fencing will consist of mesh wire fence supported by wooden poles and is circa 2.4m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3020-P05**). Where gate access is necessary, these will comprise weldmesh gates (see drawing ref **5686-LAN-XX-XX-DR-L-3021-P02**). To allow free movement of small mammals across the Site there will be scrapes under fences (see drawing ref **5686-LAN-XX-XX-DR-L-3020-P05**).
- 4.6.2 The BESS compound and the substation will be surrounded on all sides by an acoustic barrier of 4m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3010-P03**).
- 4.6.3 In addition, the BESS compound will be surrounded by security palisade fencing of approximately 2.4m in height with 6m wide gates (see drawing ref **5686-LAN-XX-XX-DR-L-3007-P01**). The substation will be surrounded by Cat2 mesh electric fencing of approximately 3.4m in height (see drawing ref **5686-LAN-XX-XX-DR-L-3003-P02**), with access via 6m wide security gates of the same height (see drawing ref **5686-LAN-XX-XX-DR-L-3002-P02**).
- 4.6.4 A number of motion sensor-based CCTV cameras, up to 4m in height, will also be provided across the Site to mitigate risk of theft and criminal damage (see drawing ref **5686-LAN-XX-XX-DR-L-3006-P03**). These will face inwards.
- 4.6.5 Limited external lighting will be required for temporary use only in the event there is an emergency out of daylight hours. No other permanent external lighting is required. It is proposed that a lighting scheme that minimises ecological disturbance, in particular in relation to potential impacts on bats, be agreed with the Council prior to commencement via a planning condition.

4.7 Site Access

- 4.7.1 There are three points of access for the Proposed Development, all existing and in use currently.
- 4.7.2 The primary access for construction will be off the A507 / Cromer Heath (at Field 7, see drawing ref **5686-LAN-XX-XX-DR-L-1002_P09**). Swept Path Analysis of the existing access has confirmed that this can accommodate the construction vehicles without any further widening works required. During operation, this will continue to be the main access and will principally be used for light vehicle access to the substation and BESS for routine maintenance. However, access does link through to the wider energy conservation park allowing for maintenance of the solar arrays and the majority of the proposed biodiversity areas.

- 4.7.3 The second access point is to the northeast of the Site (at Field 6). This is the secondary access point and will principally be used for light operational maintenance but also provides emergency access to the Site in the event that the primary access becomes unavailable. This complies with the National Fire Chief's Council (NFCC) guidance for BESS facilities in respect of access. To ensure the site is accessible for emergency vehicles when operational, the internal layout and turning heads have been tracked using a DB32 Fire Tender. This represents the largest vehicle that is likely to access the Site during operation. From here, access can be afforded to the substation compound and the BESS as well as providing more direct access to the solar arrays and skylark mitigation in Field 11. Other than in the event of an emergency vehicle attending the Site, this access will only be used by light vehicles (small 4x4 or van) approximately once a week. During construction, this access will only be used occasionally by small goods vehicles and cars.
- 4.7.4 The tertiary access point will be off the A507 to the north of the Site and will only be used by light vehicles to maintain fields 1, 2, 11 and 16 during operation. This access will not be used for construction.
- 4.7.5 Traffic effects would largely be limited to the 12–18-month construction period when materials and equipment are delivered and installed at the Site although the latter part of the construction period will largely be testing and commissioning.
- 4.7.6 Once operational, given the Proposed Development will be remotely operated and unmanned, traffic volumes would typically be limited to circa 1 van or 4x4 per week for maintenance purposes. An outline Construction Traffic Management Plan (CTMP) accompanies this planning application with final details to be secured by a planning condition, once a construction contractor is appointed.

4.8 Internal Access Tracks

- 4.8.1 With the exception of the substation compound, new internal cellular access tracks will consist of a three-dimensional cellular confinement system with an aggregate infill which can be seeded with grass for operation. Where new access tracks are planned, the footprint will be 4m–6m wide and excavated down to approximately 450mm depth, depending on the underlying formation.
- 4.8.2 For the substation compound the access tracks will be a 'made track' constructed using Type 2 aggregate and will be 4m wide with an excavation down to approximately 450mm depth, depending on the underlying formation.
- 4.8.3 Indicative cross-sections of the new access tracks are shown in drawing ref **5686-LAN-XX-XX-DR-L-3008-P03**.

4.9 Landscaping and Biodiversity Enhancements

- 4.9.1 The submitted Environmental Masterplan ref **5686-LAN-XX-XX-DR-L-1003-P09** illustrates the significant landscape mitigation measures and biodiversity measures which are embedded within the proposed design. These seek to screen the potential views of the

Proposed Development, and reinforce and enhance the character of the Site and local context, as well as augment the ecological habitats on the Site. These features will act as wildlife corridors to provide further enhance the biodiversity of the Site.

4.9.2 The proposed enhancements within the Site include:

- A total of 6.27 hectares of new woodland planting, including:
 - Approximately 1,200 linear meters of woodland belt along the north boundary of the Site providing screening of the panels from the A507;
 - Approximately 1,200 linear meters of woodland belt along the eastern side of public footpath HD|CLOTHALL|019 that runs through the centre of the Site;
 - A woodland belt approximately 20m wide running for approximately 600m along the southern boundary of the BESS compound;
 - Woodland belts, each of approximately 500 linear meters, running on either side of public footpath HD|CLOTHALL|020 through the eastern part of the Site;
 - Woodland belts along the southern and eastern side of the substation;
 - A block of woodland linking the two existing ancient woodlands adjacent to the Site;
 - Blocks of woodland between field 10 and fields 3 and 4, linking existing woodland to create a longer corridor;
- Approximately 3.6 hectares of shrub planting and approximately 0.4 hectares of scrub planting in strategic locations across the Site;
- Approximately 1.14 km of new species-rich native hedgerow with trees across the Site;
- Approximately 102.2 hectares of native species grassland within the solar panel areas;
- Approximately 21.25 hectares of new meadow planting in areas outside the solar panel fence line;
- Approximately 26.5 hectares of tussocky grassland and wildflower planting in fields 1, 2, 11 and 16, particularly suited for skylark mitigation;
- Within field 10, the creation of a shallow-sided wildlife pond with wetland seed mix with an area of 175m², surrounded by 1,350m² of regeneration grassland. This is particularly targeted at providing habitat for turtle dove; and
- Existing hedgerows to be gapped up and maintained to height of 4.5m and width of 3-4m.

4.9.3 Within the Site there will be a total built electrical infrastructure area (i.e. panels, BESS and substation) of 112.2 ha. (60%), with the remaining 75.1 ha. (40%) being used for ecological,

biodiversity and landscaping enhancements. However, part of the grassland matrix would coexist as underplanting to solar arrays themselves. The total proposed and improved ecological planting would be approximately 170 ha of the 187.3 ha Site: hence up to 88% of the Site would be devoted to habitat, biodiversity mitigation or ecological enhancement. The remaining 12% would include access roads, MVS, substation and BESS areas, and fencing.

4.9.4 The contribution of the proposed mitigation to the landscape and visual impact of the Proposed Development is set out in Section 6.9 of this statement and Chapter 7 of the Environmental Statement.

4.9.5 Lightrock were the first solar developer to have a partnership with the RSPB. Through their corporate partnership they work together to ensure that biodiversity is prioritised throughout the development design.

4.10 Biodiversity Net Gain

4.10.1 The application is accompanied by a Biodiversity Net Gain (BNG) Metric Assessment, which demonstrates that the Site will achieve an increase of 73.3% BNG in habitat units, 16.57% BNG in hedgerow units and 22.34% in watercourse units. This is reflective of the significant landscaping and ecology mitigation that has been embedded into the Proposed Development's design.

4.11 Construction

4.11.1 Construction of the Proposed Development would likely be completed within 12-18 months and so any effects arising from this are considered short term and reversible upon completion.

4.11.2 At this stage it is proposed that construction activities on Site would take place between the hours of 08:00 – 18:00 on weekdays, and between 08:00 – 13:00 on Saturdays, with no activities on Sundays or Bank Holidays. Any works outside of these hours would be limited to emergency works unless otherwise agreed in writing with the Council.

4.11.3 To ensure the potential construction impacts are minimised, the preparation of a Construction Environmental Management Plan ('CEMP') will be agreed with the Council prior to construction. It is proposed to secure this by way of a condition pursuant to the planning permission. The CEMP will outline the allocated responsibilities, procedures, and requirements for Site environmental management. It will include relevant Site-specific method statements, operating practices, and arrangements for monitoring and liaison with local authorities and stakeholders.

4.11.4 The main contractors undertaking the construction of the Proposed Development will need to adopt and comply with the CEMP, allocate environmental management responsibilities to a Site manager, and ensure that all sub-contractors' activities are effectively managed in accordance with the CEMP.

4.12 Operation

- 4.12.1 The Proposed Development would not be permanent but would be reversible with a temporary operational period of 40 years. Any planning permission would be for a non-permanent use with a condition requiring the land to be returned to its pre-development state at the end of this duration.
- 4.12.2 Once operational, the Site will not be manned full time and will be monitored remotely continuously. The use of remote monitoring reduces the number of visits required. However, regular checks will be undertaken to ensure the BESS units, solar arrays and associated infrastructure and fencing are all in good working order.
- 4.12.3 During normal operations, the Proposed Development will attract very limited vehicular movements and will only include maintenance vehicles. The movement within the Site will be either on foot or limited to a small vehicle. Personnel will visit the Site approximately once a week, in a light van or four-wheel drive vehicle, thus generating very few traffic movements. Vehicles would park onsite and would not block any roads in the vicinity of the Site.
- 4.12.4 Operations for vegetation management would be comparable to common agricultural activities.

4.13 Decommissioning

- 4.13.1 At the end of the operational lifespan of the Proposed Development, the Site would be decommissioned in accordance with best practice at that time and decommissioning effects are considered similar in nature to those arising during construction.
- 4.13.2 The Site would be reinstated to full agricultural use following decommissioning of the Site. A decommissioning plan is proposed to be secured through a condition attached to the planning permission, which will be agreed upon with the Council before the end of the Site's useful life.

5 Planning Policy Context

5.1 Decision Making

- 5.1.1 Under Section 38 (6) of The Planning and Compulsory Purchase Act 2004, the determination of planning applications must be in accordance with the approved development plan unless material considerations indicate otherwise. This chapter identifies the national and local planning policies that provide the framework within which any planning application will be made.

National Energy Policy Statements

- 5.1.2 In accordance with the 2008 Planning Act, the Government designated a suite of National Policy Statements (NPS), updated NPSs for Energy were published in November 2023 and were designated on 17 January 2024. Of relevance to this application are the Overarching National Policy Statement for Energy (EN-1), the National Policy Statement for Renewable Energy Infrastructure (EN-3), and the National Policy Statement for Electricity Networks Infrastructure (EN-5).
- 5.1.3 Each NPS states that it is *“likely to be a material consideration in decision making on relevant applications that fall under the Town and Country Planning Act 1990”*.
- 5.1.4 EN-1 states that there is an *‘urgent need’* for critical national priority (CNP) infrastructure in order to achieve *‘our energy objectives’*, which *‘will in general outweigh any other residual impacts not capable of being addressed by application of the mitigation hierarchy’*.
- 5.1.5 EN-1 paragraph 3.3.20 states that:
- 5.1.6 *“Wind and solar are the lowest cost ways of generating electricity, helping reduce costs and providing a clean and secure source of electricity supply (as they are not reliant on fuel for generation). Our analysis shows that a secure, reliable, affordable, net zero consistent system in 2050 is likely to be composed predominantly of wind and solar.”*
- 5.1.7 EN-3 paragraphs 2.10.13 and 2.10.14 confirm that solar farms are one of the most established renewable electricity technologies in the UK and the cheapest form of electricity generation. Solar farms can be built quickly and coupled with consistent reductions in the cost of materials and improvements in the efficiency of panels, large-scale solar is now viable in some cases to deploy subsidy-free.
- 5.1.8 EN-3 paragraph 2.10.9 confirms that the Government is committed to a sustained growth in solar capacity to ensure that we are on a pathway that allows up to meet next zero emissions by 2050. As such, solar is a key part of the government’s strategy for low-cost decarbonisation of the energy sector.

Draft Energy National Policy Statements (April 2025)

- 5.1.9 In April 2025, Government published draft updated versions of EN-1, EN-3 and EN-5. Material changes to the policies are subject to consultation until May 2025 prior to

designation. The principal change relevant to this application is the addition of reference to the Clean Power 2030 Action Plan. As the consultation document states, *‘the policy narrative through EN-1 has been updated to bring Clean Power 2030 front and centre as the primary policy that the NPSs enable’*.

5.1.10 Draft NPS EN-1 at paragraph 3.2.5 states that *‘The government’s strategic framework includes the Clean Power 2030 Action Plan and the pathways to 2030, the Strategic Spatial Energy Plan, and the Centralised Strategic Network Plan’*.

5.1.11 In addition, inclusion of types of infrastructure within Clean Power 2030 is incorporated into the definition of CNP, with paragraph 4.2.16 of the draft NPS EN-1 explaining that *‘Government has concluded that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure to meet the Clean Power 2030 Mission and net zero’*.

National Planning Policy Framework (NPPF)

5.1.12 The NPPF was last updated February 2025 and sets out the Government’s planning policies for England. It was written to guide the development of local planning policy documents.

5.1.13 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development, identifying that sustainable development consists of economic, social and environmental roles.

5.1.14 NPPF Paragraph 8(b) outlines that part of the social objective of sustainable development is to support strong, vibrant and healthy communities by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being.

5.1.15 So that sustainable development is pursued in a positive way, at the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11). For decision-taking, NPPF paragraph 11 is clear that this means approving development proposals that accord with an up-to-date development plan without delay. In the context of paragraph 33 of the NPPF, and as set out previously, an Adopted Local Plan is considered to be out-of-date and the presumption in favour of sustainable development, and *‘tilted balance’* is therefore engaged. However, in line with paragraph 232 of the NPPF, due weight should still be given to adopted Local Plan policies according to their degree of consistency with the NPPF. The degree of consistency of the Local Plan policies is considered in more detail in Section 6 of this report.

5.2 Written Ministerial Statements (WMS)

5.2.1 The Written Ministerial Statement made on 25 March 2015 by Eric Pickles, set out the Government’s commitment to streamlining the planning system while protecting the environment and supporting renewable energy growth. It prioritises solar development on domestic and commercial roofs and previously developed (brownfield) land. The statement emphasises strong protection for the best and most versatile agricultural land (BMV) under

the NPPF, advising that large-scale solar farms should avoid high-quality agricultural land unless there is compelling evidence to justify its use. Planning decisions should balance renewable energy benefits with environmental and local amenity considerations, assessed on individual merits through due process. There has been a fundamental change in the policy context for solar development since the 2015 WMS was issued including: the introduction of a legally-binding Net Zero target in 2019, the declaration of a climate emergency, and the introduction of two NPSs (EN-1 and EN3-) creating a notable shift in policy direction.

5.2.2 The Government's WMS of 15 May 2024, 'Solar and protecting our Food Security and Best and Most Versatile (BMV) Land (2024)', emphasises the critical importance of both food security and energy security to national resilience. While reaffirming strong support for solar energy as a key part of achieving net zero and energy independence, the WMS also makes clear that the BMV agricultural land (Grades 1, 2 and 3a) should be avoided *where possible* in favour of lower quality land.

5.2.3 The WMS confirms that solar and farming can be complementary; it states that even in the most ambitious scenarios [solar] would still occupy less than 1% of agricultural land. The WMS re-states the Government's position in respect of the use of BMV land. It does not amend national policy; it does not alter the weight to be given to the use of BMV land but proposals involving BMV land should demonstrate clear necessity and minimise impacts. This policy is consistent with the National Planning Policy Framework and the updated National Policy Statement (EN-3).

5.3 Planning Practice Guidance (PPG)

5.3.1 The PPG is an online resource that provides further context to the policies and guidance provided in the NPPF. It is intended that the PPG and the NPPF are read alongside each other for completeness. The PPG is regularly revised to reflect changes made to national planning guidance and policies.

5.3.2 Paragraph 001 Reference ID: 5-001-20140306 states that '*Increasing the amount of energy from renewable and low carbon technologies will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. Planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environmental impact is acceptable.*'

5.3.3 Paragraph 013 Reference ID: 5-013-20150327, on planning considerations that relate to large scale ground-mounted solar photovoltaic farms, states that: '*The deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.*'

5.3.4 Paragraph 032 Reference ID: 5-032-20230814 states that: 'Electricity storage can enable us to use energy more flexibly and de-carbonise our energy system cost effectively – for example, by helping to balance the system at lower cost, maximising the usable output

from intermittent low carbon generation (e.g. solar and wind), and deferring or avoiding the need for costly network upgrades and new generation capacity.’

5.4 Local Planning Policy

5.4.1 The current Development Plan for North Hertfordshire comprises:

- North Hertfordshire District Local Plan 2011-2031 (Adopted 2022);
- North Hertfordshire District Local Plan 2011-2031 Policies Map;
- Baldock, Bygrave and Clothall Neighbourhood Plan 2011-2031;
- Hertfordshire Minerals Local Plan Review 2002-2016 (Adopted March 2007);
- Hertfordshire Waste Development Framework – Waste Core Strategy & Development Management Policies – Development Plan Document 2011-2026 (Adopted November 2012);
- Hertfordshire Waste Development Framework – Waste Site Allocations – Development Plan Document 2011-2026 (Adopted July 2014); and
- Hertfordshire County Council Minerals and Waste Local Plan Interactive Adopted Policies Map (October 2024).

5.5 Other Material Considerations

5.5.1 Other material considerations include the following:

- Sustainability Supplementary Planning Document (SPD) (September 2024);
- Other documents including:
 - Hertfordshire Renewable and Low Carbon Energy Technical Study (July 2010);
 - North Hertfordshire Green Belt Review (July 2016);
 - North Herts Landscape Study (Character, Sensitivity and Capacity) (2011);
 - Planning for Biodiversity and the Natural Environment in Hertfordshire: Guiding Principles (no date);
 - Council Plan 2020-2025;
 - North Herts Climate Change Strategy 2022-2027; and
 - Clean Power 2030 Action Plan: A New Era of Clean Electricity.

6 Planning Assessment

6.1.1 The key planning matters are considered to comprise:

- Principle of Development;
- Site Suitability;
- Rural Areas beyond the Green Belt;
- Green Belt;
- Heritage;
- Design and Amenity (including Glint and Glare and Fire Safety);
- Landscape;
- Ecology and Biodiversity Net Gain;
- Arboriculture;
- Flood Risk and Drainage (including Sequential and Exception tests);
- Transport and Access;
- Noise; and
- Agricultural Land Classification.

6.2 Principle of Development

6.2.1 As part of the Vision, the Local Plan states that the District will play its part in addressing climate change.

6.2.2 Policy NE12 (Renewable and Low Carbon Energy Development) advises that proposals for solar farms involving the best and most versatile agricultural land will be determined in accordance with national policy. It states that proposals for other renewable and low carbon energy development which would contribute towards reducing greenhouse gas emissions will be permitted subject to an assessment of the impacts upon on the following:

- Landscape quality, character and visual amenity including consideration of cumulative impacts of development;
- Environmental assets;
- Historic environment including the impact of the setting of the heritage asset;
- The transport network;
- Air quality;
- Aviation interests; and
- Amenity of residents.

- 6.2.3 Policy NE12 confirms that in assessing renewable and low carbon energy proposals against the above, the Council will give significant weight to their local and wider benefits, particularly the potential to reduce greenhouse gas and other harmful emissions. The policy advises that the site must be restored to its former state or a condition agreed with the Council at the end of life/redundancy.
- 6.2.4 Policy SP11 (Natural Resources and Sustainability) states that the Council will seek to mitigate the challenges of climate change. This includes through supporting proposals for renewable and low carbon energy development in appropriate locations.
- 6.2.5 The Sustainability SPD advises that renewable and low carbon energy is pivotal in the drive towards net zero and provides an overview of the local planning policy in respect of renewable energy developments. Whilst the SPD makes note of homes energy storage systems, it does not appear to provide narrative on larger scale storage.
- 6.2.6 On 21 May 2019, North Herts passed a climate emergency motion which asserted the Council's commitment toward climate action beyond current government targets and international agreements. This is currently pursued the Council's Climate Change Strategy 2022 to 2027.
- 6.2.7 The Climate Change Strategy provides further detail on the Council's approach and advises that the Council has a long-term focus on climate action. As such, it sets out a number of sustainability focused objectives including, amongst others, achieving a net zero carbon by 2040, becoming a District that is resilient to the unavoidable impacts of climate change, and ensuring all operations and services are resilient to the impacts of climate change. One of the strategic priorities is to enable carbon savings.
- 6.2.8 The reliability, cost and flexibility of the supply of energy in the UK is recognised by the Government as being of national strategic importance, supporting the Government's aims to reach net zero carbon emission by 2050 and to enhance the energy security of the UK in the face of increasing international instability, with energy supply manipulation being used as a weapon of war.
- 6.2.9 The Government are pushing this further, as A Rayner stated in her Ministerial Statement on 30 July 2024 (UIN HCWS48):
- "Turning to green energy, boosting the delivery of renewables will be critical to meeting the Government's commitment to zero carbon electricity generation by 2030. That is why on this Government's fourth day in office we ended the ban on onshore wind, with that position formally reflected in the update to the National Planning Policy Framework published today. We must however go much further – which is why we are proposing to: boost the weight that planning policy gives to the benefits associated with renewables; bring larger scale onshore wind projects back into the Nationally Significant Infrastructure Projects regime; and change the threshold for solar development to reflect developments in solar technology."*
- 6.2.10 The NPPF sets out that the purpose of the planning system is to contribute to the achievement of sustainable development. More specifically, paragraph 7 of the NPPF highlights that the purpose of the planning system is to contribute to the achievement of sustainable development. Paragraph 8 states that achieving sustainable development means that the planning system has three overarching objectives, which are

interdependent and need to be pursued in mutually supportive ways. This includes an economic, social and environmental objective.

- 6.2.11 Support for renewable energy is set out in Paragraph 161 of the NPPF which advises that the planning system should support the transition to net zero by 2050 and take full account of all climate impacts. The NPPF states that it should help to, amongst others, shape places in ways that contribute to radical reductions in greenhouse gas emissions; minimise vulnerability and improve resilience; and support renewable and low carbon energy and associated infrastructure.
- 6.2.12 As such, Paragraph 164 states that new development should be planned in ways that, in summary, avoid increased vulnerability to the range of impacts from climate change and help to reduce greenhouse gas emissions.
- 6.2.13 In respect of determining planning applications for all forms of renewable and low carbon energy developments and their associated infrastructure, Paragraph 168 puts forward that Local Planning Authorities (LPAs) should, amongst others, not require applicants to demonstrate the overall need for renewable or low carbon energy, and give significant weight to the benefits associated with renewable and low carbon energy generation and the proposal's contribution to a net zero future.
- 6.2.14 National Policy Statements (NPSs) set out the Government's policy for delivery of major energy infrastructure. Of relevance to this proposal is the Overarching National Policy Statement for Energy (EN-1) and for Renewable Energy Infrastructure (EN-3) which were updated in January 2024. In general, EN-1 and EN-3 reaffirm the need to diversify and decarbonise electricity generation in the UK and the Government's commitment to significantly increase renewable generation capacity.
- 6.2.15 Furthermore, the Renewable and Low Carbon Energy (August 2023) guidance continues to express the importance of renewable and low carbon energy. Paragraph 001 (Reference ID: 5-001-20140306) states that increasing such supply will help to make sure the UK has a secure energy supply, reduce greenhouse gas emissions to slow down climate change and stimulate investment in new jobs and businesses. It states that planning has an important role in the delivery of new renewable and low carbon energy infrastructure in locations where the local environment impact is acceptable.
- 6.2.16 In respect of BESS, Paragraph 032 (Reference ID: 5-032-20230814) highlights the importance of this for decarbonising the energy system cost effectively through maximising the usable output from intermittent low carbon generation (e.g. solar) and deferring the need for costly network upgrades, and new generation capacity and using energy more flexibly.
- 6.2.17 The Clean Power 2030 Action Plan: A New Era of Clean Energy (December 2024) reinforces the push towards the clean power sector. The 2030 mission will grow the UK's overall generation capacity and expand the network infrastructure so that the UK can safely and securely meet changing demand patterns in 2030 and beyond, driven by consumers greener choices through the net zero transition. It states that our energy must meet demand whilst protecting families and businesses from global supply shocks and volatile prices.

Clean Power means that by 2030, Great Britain will generate enough clean power to meet total energy annual electricity demand, back up by unabated gas supply to be used only when essential. As part of the path to 2030, the Plan states that 45-47GW of solar power is to be provided, along with 23-27GW of battery capacity.

- 6.2.18 There is a clear directive at both the local and national levels highlighting the significant need for renewable and low carbon energy. The BESS element of the Proposed Development whilst not a form renewable energy generation, it is an essential enabler and provides essential grid balancing services to support the growth of renewable energy generation in the UK through increasing the capacity of the National Grid that is available to store such energy, which can be intermittent. The development of this BESS will therefore aid the advancement of local and national renewable energy and carbon reduction policies and objectives.
- 6.2.19 The amount of renewable energy that will be produced by the Proposed Development will provide for a reduction of approximately 20,000 cubic tonnes of CO₂ emissions and meet the energy needs of approximately 30,000 homes through renewable energy.
- 6.2.20 On this basis, the principle of the development should be considered acceptable in the context of North Herts Policy NE12 and SP11, Sustainability SPD and Climate Strategy, along with national planning policy.

6.3 Site Suitability

Introduction

- 6.3.1 This section of the Planning, Design and Access Statement provides an assessment of the suitability of the Site for solar development with regard to generally accepted criteria.
- 6.3.2 National Policy Statement for Renewable Energy Infrastructure (EN-3) at paragraph 2.10.18 recognises that there a range of ‘*key considerations involved in the siting of a solar farm*’. These include: site topography, grid connection, proximity of dwellings, agricultural land grade, access, existence of public rights of way, security and site capacity. The solar industry trade body Solar Energy UK has published a Factsheet on Site Selection (June 2024), which also emphasises these factors, as well as other planning considerations.
- 6.3.3 There is no policy requirement for there to be consideration of site selection or to consider alternative sites, but the Council have requested that the Applicant cover this in the planning submission and outline the process which the Applicant has gone through to choose this Site.
- 6.3.4 It should be noted in appeal APP/Q3115/W/24/3350890, the Inspector concludes in paragraph 21 of their decision that:

“Overall, the policies and guidance indicate that careful consideration needs to be given to the use of BMV land but whilst the use of poorer quality land is preferred there is no prohibition on the use of BMV land. The recent Mead Realisations judgement sets out relevant factors that may be considered when deciding what weight to give to various

policies and guidance. Being published in December 2024, having been subject to consultation, and representing the views of the current government, I give greatest weight to the Framework, particularly in comparison to the PPG that dates from 2015. Similarly, I find the need to give due weight to the use of BMV, as set out in the 2024 WMS to be more appropriate than the need to provide compelling evidence as required in the 2015 WMS.”

- 6.3.5 The Applicant also refers to paragraph 37 of the above appeal decision which states *“Moreover, unlike the Framework which clearly identifies in which situations a sequential test is necessary and sets out a methodology for doing this, neither DES7 or its supporting text makes any reference to the need for a sequential approach or how to carry one out. In relation to the use of BMV land the Framework requires the economic and other benefits to be considered, not a sequential approach. Furthermore, neither EN-1 or EN-3 require a sequential approach.”*
- 6.3.6 The Applicant takes the same stance in relation to the weight that should be given to the 2015 WMS which relates to the terminology of compelling evidence and there is no up to date policy requirement a sequential style assessment for this to be provided in respect of BMV land.

Suitability Criteria Assessment

- 6.3.7 It is expected that a Point of Connection (POC) will be achievable to the 400kV overhead power line that runs from Stocking Pelham to Wymondley on the section between Wymondley substation and the town of Buntingford to the east.
- 6.3.8 The Applicant considers that the Proposed Development would be viable up to a distance of 2km from the powerline, with a distance of less than 1km being preferable. The resulting site study area is shown in Figure 6.1 in Appendix 1.
- 6.3.9 The following key planning considerations will influence the assessment of suitability:
- Green Belt. If all or part of the site is within Green Belt, justification for development will have to be provided. It is therefore preferable to exclude or minimise the amount of Green Belt land affected by the Proposed Development.
 - Agricultural Land. Local and national planning policy seeks to reduce the use of best and most versatile land (BMV), which includes land of Grades 1, 2 and 3a. The provisional Agricultural Land Classification (ALC) map does not differentiate between land of Grades 3a and 3b. The study area does not include land of Grade 4. Sites wholly or partly located within provisional areas of Grade 3 land are therefore more suitable than those within areas of Grade 2 land as they are more likely to consist of non-BMV land.
 - Heritage. Proximity to heritage assets is likely to increase adverse impacts. A standard buffer of 150m from heritage, beyond which impacts are likely to be limited, has been used.
 - Woodland. Solar farms are incompatible with woodland, although may be constructed in close proximity with appropriate mitigation.

- **Flood Risk.** It is preferable to avoid development within areas of flood risk, although schemes can be designed to minimise or avoid risk.

- 6.3.10 These factors have been mapped within the study area, as shown in Figure 6.1. Areas that are not affected by one or more of these are considered to be ‘unconstrained land’, which is shown in Figure 6.2 in Appendix 1.
- 6.3.11 In order to accommodate a scheme with sufficient generation capacity, one or more sites of at least 50 hectares are required. Two landholdings above this threshold mostly located within the unconstrained study area were identified.
- 6.3.12 Professional Advisors working on the Proposed Development under this Application made contact with both landowners and established that only one was interested in using the landholding for solar development. It was verified that the land met the requirements for topography and accessibility, and that no other site-specific constraints existed. This landholding was carried forward and now constitutes the application Site.

Conclusion

- 6.3.13 An assessment of the suitability of the Site for solar development has been carried out. This assessment considered grid connection requirements, a range of planning constraints, site size and availability.
- 6.3.14 This assessment concludes that no other available site with required capacity within the study area is likely to have lower impacts on landscape, heritage, flooding or agricultural land. The selected Site is therefore suitable for this type of development.

6.4 Rural Areas beyond the Green Belt

- 6.4.1 The Site is located outside of any settlement boundary and is predominantly within the Rural Area beyond the Green Belt with a small section of development (fields 14a and 15) partly within the Green Belt. Green Belt matters will be discussed in section 6.5.
- 6.4.2 Policy SP1 (Sustainable Development in North Hertfordshire) supports the principles of sustainable development and the Council will, amongst others, maintain the role of key settlements within and adjoining the District as the main focus for housing, employment and new development making best use of previously developed land, where possible.
- 6.4.3 Policy CGB1 (Rural Areas beyond the Green Belt) states that planning permission will be granted provided that the development is restricted to a number of uses and requirements. None of the listed uses are relevant to the Proposed Development and it is therefore contrary to policy. Acknowledging this, we set out a number of reasons justifying the location of the Proposed Development which we request should be considered by the Council.
- 6.4.4 In particular, solar farms require a relatively large amount of land area. As such, solar farms are more appropriate in rural areas rather than urban locations which are typically assigned for residential and employment development. Whilst BESS does not require as large an

amount of land, these often complement solar development, and their co-location is actively encouraged. Suitable sites for such developments are therefore outside of settlement boundaries.

6.4.5 Further to this, it should be noted that the Council does not designate any sites across the District for low carbon and renewable energy development. Given the general requirements for solar developments, it is expected that such developments will need to be developed on land within the Rural Areas beyond the Green Belt and weighted in the planning balance when considering all aspects of sustainable development.

6.4.6 An example of this in North Herts is the solar and battery storage development at Land West of Ashwell Road, Bygrave (Ref. 22/00741/FP). The Officer's Report confirms that the development would be contrary to amongst others, Policy SP1 and Policy CGB1 insofar as the development is in an area of restraint and does not meet any exceptions. That said, it notes that, as set out in NPPF and Policy SP1, it is necessary to consider the wider social, economic and environmental impacts to understand whether the proposal is sustainable development. It was concluded overall that proposals of this nature and scale will inevitably result in conflict with and tension between policies meaning that it is difficult to reconcile all expectations and requirements. Upon consideration of the social, economic, and environmental objectives of the planning system, it was considered that the proposed development is sustainable and there is a presumption in favour of it.

6.4.7 Taking this same approach for the Proposed Development, it is considered that the proposals would contribute to the three pillars of sustainable development as summarised below:

- Social:
 - Greater energy security and independence;
 - Health benefits and reduced climate anxiety through reduced greenhouse gas emissions and climate change.
- Economic:
 - Reduced energy costs;
 - Natural energy generation;
 - Rural income diversification;
 - Job creation.
- Environmental:
 - Reduced greenhouse gas emissions and helping mitigate climate change;
 - Biodiversity enhancements.

6.4.8 The potential impact of the Proposed Development upon matters such as landscape and visual amenity, heritage, glint and glare, transport and flood risk are assessed in the relevant sub-sections of this Statement.

- 6.4.9 Whilst the Proposed Development does not comply with Policy CGB1, in the context of SP1 and the NPPF, the social, economic and environmental merits should outweigh this.

6.5 Green Belt

- 6.5.1 In total, approximately 41.19ha of the western section of the Site is located within Green Belt. This represents 22% of the total Site area. Of this area, only approximately 14.2 ha is proposed to be included within the area for solar development.
- 6.5.2 Policy SP5 (Countryside and Green Belt) states that the Council supports the principles of the Green Belt and recognises the intrinsic value of the countryside. It states that the Council will only permit development proposals in the Green Belt where they would not result in inappropriate development or where very special circumstances have been demonstrated.
- 6.5.3 Supporting narrative of Policy SP5 at Paragraph 4.61 states that proposals for development within the Green Belt will be considered against national policy.
- 6.5.4 Paragraph 142 of the NPPF advises that Council's attach great importance to Green Belts and that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and their permanence.
- 6.5.5 NPPF Paragraph 143 sets out that Green Belt serves five purposes. These are provided below:
- (a) To check the unrestricted sprawl of large built-up areas;
 - (b) To prevent neighbouring towns merging into one another;
 - (c) To assist in safeguarding the countryside from encroachment;
 - (d) To preserve the setting and special character of historic towns; and
 - (e) To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 6.5.6 NPPF Paragraph 145 states that Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified through the preparation or updating of plans. It continues to state that strategic policies should establish the need for any changes to Green Belt boundaries, with detailed amendments to those boundaries through non-strategic policies. In relation to this point, NPPF Paragraphs 146 and 147 go on to provide further detail in relation to exceptional circumstances.
- 6.5.7 Where it is considered necessary to release Green Belt land for development, NPPF Paragraph 148 states that plans should give priority to previously developed land, then consider Grey Belt, which is not previously developed, and then other Green Belt locations. It continues to promote sustainable patterns of development when determining whether a site's location is appropriate.
- 6.5.8 The glossary to the NPPF defines the Grey Belt as follows:

“For the purposes of plan-making and decision-making, ‘Grey Belt’ is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in paragraph 143. ‘Grey belt’ excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt) would provide a strong reason for refusing or restricting development”.

- 6.5.9 Footnote 7 refers to Framework policies (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 194) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 75); and areas at risk of flooding or coastal change.
- 6.5.10 Paragraph 153 of the NPPF states that when considering any planning application, LPAs should ensure that substantial weight is given to any harm in the Green Belt, including harm to its openness. Footnote 55 to NPPF Paragraph 153 clarifies that this is other than in the case of development on previously developed land or grey belt land, where development is not inappropriate. NPPF Paragraph 153 also sets out that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in ‘*very special circumstances*’. It continues to state that ‘*very special circumstances*’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.
- 6.5.11 Exceptions to inappropriate development are provided at Paragraph 154 of the NPPF; none of which are applicable to the Proposed Development.
- 6.5.12 However, Paragraph 155 of the NPPF goes on to state that development in the Green Belt should not be regarded as inappropriate where:
- a) Development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan as a whole;*
 - b) There is a demonstrable unmet need for the type of development proposed;*
 - c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework; and*
 - d) Where applicable the development proposed meets the ‘Golden Rules’ requirements set out in paragraphs 156-157 below.*
- 6.5.13 Planning Practice Guidance (PPG) on Green Belt was updated in February 2025 in Paragraph: 001 Reference ID: 64-001-20250225 through to Paragraph: 014 Reference ID: 64-014-20250225. This guidance provides additional information in respect of green belt and grey belt. It outlines the approach to green belt assessments, how assessments should appraise how strongly land performs against the NPPF’s green belt purposes, how to define grey belt and assess the impact of proposals on green belt openness.

6.6 Greenbelt Assessment

6.6.1 The following section undertakes a Greenbelt assessment in two parts considering the Proposed Development's assessment against the definition of Grey Belt and then whether the Proposed Development constitutes inappropriate development.

Part A – Assessment against the definition of Grey Belt

- Previously developed land (NPPF Definition and PPG Paragraph 001).
- Contribution to purposes (a), (b) or (d) as set out in NPPF Paragraph 143 and PPG Paragraph 005. Assessment factors include openness, function, distinction, and impact on adjacent Green Belt.
- Areas or assets of particular importance in NPPF Footnote 7 (PPG Paragraph 006).
- Conclusion of whether the Parcels fall within the definition of Grey Belt land (PPG Paragraph 007).

6.6.2 Taking each of the above criterion in turn, the Site does not comprise previously developed land. However, this is not considered to be fundamental to the determination as to whether the Site is Grey Belt due to the 'and / or' identified in the definition above. We therefore provide an initial review of the Site against the purposes (a), (b) and (d) of Paragraph 143, along with the Green Belt PPG (Paragraph: 005 Reference ID: 64-005-20250225) at Table 6.1.

Table 6.1: Purpose of the Green Belt Review

Purpose (as per Paragraph 143 of the NPPF) and Green Belt PPG	Site Review
(a) To check the unrestricted sprawl of large built-up areas. The PPG confirms that villages should not be considered large built up areas.	The Site is not adjacent to or near to a large built up area and therefore makes no contribution to this purpose. To reinforce this, the nearest large built up area is Stevenage approximately 3km southwest and Letchworth Garden City approximately 4km northwest.
(b) To prevent neighbouring towns merging into one another. The PPG confirms that this purpose relates to the merging of towns, not villages.	The Site is situated in a predominantly rural setting, with a number of villages in the surrounding area. The nearest town is Stevenage located approximately 3km southwest. Letchworth Garden City is located approximately 4km northwest. As the Site does not form part of a gap between towns, it is considered that no contribution is made to this purpose.
(d) To preserve the setting and special character of historic towns. The PPG confirms that this purpose relates to historic towns, not villages.	Letchworth Garden City Conservation Area is approximately 5.5km west of the Site. It is considered that the Site does not form part of the setting of a historic town and has no visual, physical or experiential connection to the historic aspect of the town and therefore

	considered to make no contribution to this purpose.
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- 6.6.3 The impact on purposes (a), (b) and (d) are considered above in Table 6.1. In respect of purpose (c), it is acknowledged that solar and BESS would result in some harm to safeguarding the countryside from encroachment. Notwithstanding this, the parcel of the Site within the Green Belt is only 22% of the total Site area; and only 7.6% of the total Site area is proposed for solar development in the Green Belt. Within the Site three fields are proposed for ecological mitigation (skylark) and will be cropped to appeal to skylark, therefore from a land use perspective, there will be no change. Two fields (14a and part of 15), with a total area of 14.2 hectares, will be used for solar panels. Across the area of the Site, the harm resulting from encroachment is considered to be negligible.
- 6.6.4 Purpose (e) relates to urban regeneration by encouraging the recycling of derelict and other urban land. As set out at Section 6.3 of this assessment, due to the land take and grid connection requirements, this is not considered to be suitable for this type of development. We therefore argue that that this is not relevant.
- 6.6.5 The NPPF definition of grey belt states that it ‘*excludes land where the application of the policies relating to the areas or assets in footnote 7 (other than Green Belt)*’. None of the areas or assets of particular importance as outlined in NPPF Footnote 7 (and PPG Paragraph 006 Reference ID: 64-006-20250225) are located within the part of the Site that is designated as Green Belt.
- 6.6.6 Based on these conclusions, the Applicant’s position is that the Site should be considered as Grey Belt. However, for the proposal not to be considered inappropriate development, it must satisfy all of the criterion listed at paragraph 155 of the NPPF. The following section provides an assessment in respect of these criterions.

Part B - Do the proposals constitute inappropriate development?

- 6.6.7 The Proposed Development does not fall within the exceptions identified Paragraph 154 of the NPPF. However, and for the reasons set out previously, the Site is considered to be Grey Belt land as per the definitions of the NPPF and PPG. In this context, Footnote 55 is clear that development in the Grey Belt is not inappropriate.

Criterion (a) - Development would utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the plan as a whole.

- 6.6.8 Criterion (a) requires development to utilise Grey Belt land and would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the area of the Plan.
- 6.6.9 The North Herts Green Belt Review (Update 2018) states that the Site is within land parcel 17 (Weston) which is considered to make a limited contribution to Green Belt purposes, although there is some role in preventing encroachment into open countryside. It is

considered that the development of the Site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt as the area of Green Belt utilised as part of the Proposed Development is 41.2 hectares which represents only 0.29% of the total Green Belt within the North Herts administrative area (14,247 hectares). Furthermore, mitigation measures to avoid, reduce, and / or offset effects on the wider Green Belt are embedded in the proposed design. Development of the Site would therefore not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the plan area as a whole. Additionally, the Proposed Development is for a 40 year temporary period, and as such any localised impacts would be limited to this time-period, following this the Site would be decommissioned and returned to its former use, with no residual impacts.

- 6.6.10 Taking the above into account, we conclude that the Proposed Development would not fundamentally undermine the purposes when taken together of the remaining Green Belt in the plan area. As such, Criterion (a) of paragraph 155 is met.

Criterion (b) - There is a demonstrable unmet need for the type of development proposed

- 6.6.11 Criterion (b) requires a demonstratable unmet need for the type of development proposed.
- 6.6.12 As discussed at Section 6.2 of this assessment, there is a significant and clear demonstrable need for renewable and low carbon energy locally and nationally. For brevity, evidence to support this is not repeated. However, it is considered that this criterion is met.

Criterion (c) The development would be in a sustainable location, with particular reference to paragraphs 110 and 115 of the Framework

- 6.6.13 Criterion (c) requires that development is in a sustainable location, with particular reference to Paragraphs 110 and 115 of the NPPF.
- 6.6.14 Paragraph 110 indicates that the planning system should actively manage patterns of growth in support of promoting sustainable transport. It advises that significant development should be focused on locations which are or can be made sustainable through limiting the need to travel and offering a genuine choice of transport modes. That said, the policy recognises that opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in decision-making. The essence of paragraph 110 is considered to relate to development that would generate a significant number of vehicle movements, notably by car. NPPF Paragraph 110 should not be applied in this context, on the basis that the Proposed Development does not represent 'significant development' in relation to limiting the need to travel and offering a genuine choice of transport modes.
- 6.6.15 Paragraph 115 states that in assessing applications for development it should be ensure that, in summary, sustainable transport modes are prioritised, safe and suitable access is achieved for all users; the design of transport elements reflect national guidance; and any

significant impacts from the development on the transport network or on highway safety can be cost effectively mitigated to an acceptable degree.

- 6.6.16 Having said this, the PPG confirms that whether locations are sustainable should be determined in light of local context and site or development-specific constraints (Paragraph: 011 Reference ID: 64-011-20250225).
- 6.6.17 As set out in the Transport Statement, vehicle movements would largely be limited to the 12-18 month construction period when materials and equipment are delivered and installed at the Site. A total of approximately 4,139 deliveries are expected over the construction phase, this equates to a total of 8,278 HGV movements within the construction programme construction, equating to an average of just under 40 HGV movements per day.
- 6.6.18 It is intended that traffic measures during construction will be adequately controlled through a Construction Traffic Management Plan (CTMP).
- 6.6.19 Once operational, given the Proposed Development will be remotely operated and un-manned, traffic volumes would typically be limited to circa 1 van or 4x4 per week for maintenance purposes. These vehicle movements will replace some of the agricultural vehicles that currently access the Site, and there will be a net reduction in the number of vehicle movement through the adjacent field access.
- 6.6.20 In line with Paragraph 115, since minimal vehicle movements are generated during the Site's operational phase, and the Proposed Development makes use of the existing road network with no permanent upgrades required, it is inherently sustainable in nature. In addition, the Site's close proximity to the motorway and trunk road network ensures connectivity while reducing the need for any significant new road infrastructure.

Criterion (d) - meets the 'Golden Rules' requirements set out in paragraphs 156-157 of the NPPF

- 6.6.21 In respect of Criterion (d) which requires applicable development to meet the 'Golden Rules' as set out at Paragraphs 156-157, this relates specifically to major development involving the provision of housing and therefore does not apply to the Proposed Development.

Summary

- 6.6.22 To conclude, as demonstrated in the proceeding section, the Site complies with the definition of the Grey Belt as set out in the NPPF; the development of the Site would not fundamentally undermine the purposes (taken together) of the remaining Green Belt across the administrative area of North Herts when taken as a whole; there is a demonstrable, unmet need for the Proposed Development, and the Site is sustainably located.
- 6.6.23 Footnote 55 of NPPF sets out that if development is considered to be not inappropriate development on grey belt land, this is excluded from the policy requirement to give substantial weight to any harm to the Green Belt, including its openness. As confirmed in

PPG, this is consistent with rulings from the Courts on these matters that where development is not considered to be inappropriate in the Green Belt, it follows that the test of impacts to openness or to Green Belt purposes are addressed and therefore a proposal does not have to be justified by 'very special circumstances' (Paragraph: 014 Reference ID: 64-014-20250225).

6.6.24 In this context, the Proposed Development complies with Policy SP5.

6.7 Heritage

6.7.1 Local Plan Policy SP13 (Historic Environment) advises that the Council will balance the need for growth with the proper protection and enhancement of the historic environment. When considering the impact of the Proposed Development on the significance of a designated heritage asset, great weight will be given to the asset's conservation and management of the setting. The Council will pursue a positive strategy for the conservation and enjoyment of the historic environment through, amongst others, maintaining a strong presumption in favour of retention, preservation and enhancement of heritage assets and their setting according to their significance.

6.7.2 Local Plan Policy HE1 (Designated Heritage Assets) states that planning applications relating to designated heritage assets or their setting shall be accompanied by a Heritage Assessment/Justification that, in summary, assesses the significance of heritage assets including their setting; justifies and details the impact of the proposal on the significance of the asset; and informs any necessary measures to minimise or mitigate against any identified harms.

6.7.3 The policy states that planning permission for development proposals affecting designated heritage assets or their setting will be granted where they (as applicable), amongst others, will lead to less than substantial harm to the significance of the designated heritage asset, and this harm is outweighed by the public benefits of the development.

6.7.4 However, where substantial harm to, or loss of significance of a designated heritage asset is proposed, the policy states that the Council will refuse consent unless it can be demonstrated that the scheme is necessary to deliver considerable public benefits that outweigh the harm or loss.

6.7.5 Chapter 16 of the NPPF relates to the conservation and enhancement of the historic environment. Paragraph 202 advises that heritage assets range from sites and buildings of local historic value to those of highest significance, and these assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance.

6.7.6 When considering the impact of a proposed development on the significance of a designated heritage asset, paragraph 212 of the NPPF advises that great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts of substantial harm, total loss or less than substantial harm to its significance.

- 6.7.7 Paragraph 214 of the NPPF states that where a proposed development will lead to substantial harm to a designated heritage asset, LPAs should refuse consent, unless it can be demonstrated that the substantial harm is necessary to achieve substantial public benefits that outweigh the harm.
- 6.7.8 Paragraph 215 of the NPPF advises that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.
- 6.7.9 Local Plan Policy HE4 (Archaeology) confirms that planning permission for development proposals effecting heritage assets with archaeological interest will be granted provided that:
- a) Developers submit an appropriate desk-based assessment and, where justified, an archaeological field evaluation;
 - b) It is demonstrated how archaeological remains will be preserved and incorporated into the layout of that development, if in situ preservation of important archaeological remains is considered preferable; and
 - c) Where the loss of the whole or a material part of important archaeological remains is justified, appropriate conditions are applied to ensure that the archaeological recording, reporting, publication and archiving of the results of such archaeological work is undertaken before it is damaged or lost.
- 6.7.10 The Historic Environment Desk-Based Assessment (Lanpro, June 2025) addresses the information requirements set out in the NPPF and provides the proportionate response sought by the NPPF. In order to clarify the heritage significance and archaeological potential of the Site, the Assessment draws together the available archaeological, historical, topographic and land-use information and is informed by a geophysical survey of the Site carried out in May 2025.
- 6.7.11 The Assessment has established that the Proposed Development would result in less than substantial harm, at the lower end of the scale, to the Site of Cumberlow Manor House Scheduled Monument and to the Cromer Windmill.
- 6.7.12 There is potential for below-ground archaeological remains from the prehistoric, Roman, medieval, and post-medieval periods to be present within the Site. These include anomalies that are likely to represent settlement evidence, including enclosures, field systems and ring-ditches potentially dating to the Iron Age and/or Roman periods. These features are located in proximity to the conjectured line of the Baldock to Braughing Roman Road, as well as an area where a Late Bronze Age hoard and Roman finds have been recorded, further suggesting an increased likelihood of archaeological survival.
- 6.7.1 The conclusions of the Historic Environment Desk-Based Assessment demonstrate that there is less than substantial harm, at the lower end of the scale, to the Scheduled Monument and Cromer Windmill and a series of measures are outlined in Section 7 of the Desk Based Assessment which provide a range of methods that can be utilised to avoid or sensitively design around any areas of archaeological interest. It is considered that the Proposed Development complies with policy HE4.

6.8 Design and Amenity

- 6.8.1 Policy SP9 (Design and Sustainability) advises that the Council considers good design to be a key aspect of sustainable development. New development where it is well designed and located, as well as responding positively to its local context, will be supported.
- 6.8.2 Policy D1 (Sustainable Design) states that planning permission will be granted provided that development proposals, in summary, amongst others, respond positively to the Site's context; take all reasonable responsibilities, consistent with the nature and scale of the scheme; and have regard to the Design SPD.
- 6.8.3 Policy D3 (Protecting Living Conditions) states that planning permission will be granted for development proposals which do not cause unacceptable harm to living conditions. Where living conditions of an existing development would be affected by the proposed use, the Council will consider whether there are mitigation measures that can be taken to mitigate the harm to an acceptable level. If the Council is not satisfied that mitigation proposals would address the identified harm, planning permission will not be granted. Policy G3 (Creating Well-Designed Places) of the Neighbourhood Plan advises that all applications for development should demonstrate a high standard of design that accords with relevant aspects of the Design Guidelines attended to this Plan. The Baldock, Bygrave and Clothall Neighbourhood Plan Design Guidelines (March 2019) relates predominantly to the townscape. However, it indicates that local residents favour open spaces and landscaping.
- 6.8.4 Policy NE12 (Renewable and low carbon energy development) states that renewable energy schemes will be permitted subject to assessment of impacts on the amenity of residents.
- 6.8.5 Paragraph 131 of the NPPF advises that good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Paragraph 135 states that planning decisions should ensure that developments will, in summary:
- Function well and add to the overall quality of the area;
 - Are visually attractive;
 - Are sympathetic to local character and history;
 - Establish or maintain a strong sense of place;
 - Optimise the potential of the Site; and
 - Create places that are safe, inclusive and accessible.
- 6.8.6 An assessment of the character of the Site and its surroundings has been undertaken and informed the design of the Proposed Development to ensure that the new development is well designed and located and responds positively to the existing context. Reflecting its green environment, biodiversity enhancements are a key focus to the design approach. The Proposed Development therefore complies with policies SP9, D1 and D3 as well as the NPPF.

Glint and Glare

- 6.8.7 A Glint and Glare Assessment has been prepared by Metrica Environmental Consulting as part of the application. The assessment considers the potential effects caused by the reflection of sunlight from the solar photovoltaic panels.
- 6.8.8 Identified potential receptors include: one non-safeguarded airfield, Graveley Hall Farm; three residential dwellings located to the east of the Proposed Development; and the A507 road which runs along the northern boundary of the Site. No rail receptors have been identified.
- 6.8.9 No glare has been predicted for residential and aviation receptors. 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 standard assessment criteria.
- 6.8.10 Cumulative impacts in relation to Beane Solar Farm (East Herts, ref: 3/24/2245/FUL) were also considered. There is no prospect of unacceptable cumulative impacts occurring.
- 6.8.11 The Proposed Development is therefore acceptable in terms of glint and glare and conforms to the requirements of policies D3 and NE12 in relation to residential amenity.

Fire Safety

- 6.8.12 There is no specific planning policy at national or local level which deals with fire safety, however it is an integral part of the design process with the development of a BESS. As part of this planning application, an Outline Battery Safety Management Plan (OBSMP) (Abbott Risk Consulting Ltd) has been developed to outline the potential risks presented by the BESS element of the Proposed Development and its operation / maintenance. This OBSMP provides a robust safety strategy, backed by evidence to support full commissioning. Whilst there is no planning policy to consider, there are other industry standards that inform the safety management approach to be adopted. The approach taken is the ethos of 'As Low As Is Reasonably Practicable' (ALARP) as defined in the Health and Safety Executive (HSE) 'Reducing Risk, Protecting People' Guidance document (2001).
- 6.8.13 The safety assessment follows the guidance provided in:
- The National Fire Chiefs Council (NFCC, 2022) Guidance for BESS installations and the associated FM Global Datasheet 5-33; and
 - The Department for Energy Security and Net Zero, Grid scale electrical energy storage systems: health and safety (2024)
- 6.8.14 There are a number of NFCC recommendations which are set out in Table 5.1 of the OBSMP and the Proposed Development is fully compliant with them all.
- 6.8.15 Alongside this safety management has been considered which will be secured through an emergency response plan (ERP). An ERP will be developed after planning determination, in conjunction with the Fire and Rescue Service, which will outline how the Site owner/operator will respond to incident and accident scenarios at the Site. This includes

the interfaces with external first responder organisations. The ERP will be iterative in its approach and will be developed in parallel with technical safety requirements. This ensures that the Site design and ERP are properly integrated, and that appropriate information can be provided to first responders to include in their planning activities.

- 6.8.16 The BESS safety management structure has yet to be fully defined and will be subject to the safety management strategies and procedures that are in place with the successful supplier and installer of the BESS. At this juncture the minimum requirement is for a formal top-down management structure that has the authority and responsibility to ensure safety management and environmental risk is at the forefront of products, procedures, and services.
- 6.8.17 In conclusion, the OBSMP has been developed using existing knowledge of renewable and BESS capability and leans heavily on the subject matter expertise that ARC has in this technological domain. Installation of the BESS in accordance with Original Equipment Manufacturer instructions followed by a period of qualification and testing will provide the supporting evidence. This will also allow for the consolidation of control evidence and enhanced development of mitigation to further reduce the level of risk posed.
- 6.8.18 It is recommended that the safety management as defined in the OBSMP is adhered to throughout the Site's operational lifetime to ensure that safety management is developed as the programme progresses and remains valid throughout the life of the Site. Further details can be captured within the Detailed Battery Safety Management Plan to be secured by a planning condition.
- 6.8.19 It is therefore considered that the BESS element of the Proposed Development is in compliance with the industry standards on fire safety and the necessary control can be secured through planning condition(s).

6.9 Landscape

- 6.9.1 Policy NE2 (Landscape) sets out that planning permission will be granted for development proposals that:
- Respect the sensitivities of the relevant landscape character area and have regard to the guidelines identified for built development and landscape management;
 - Do not cause unacceptable harm to the character and appearance of the surrounding area or the landscape character area in which the site is located, taking account of any suitable mitigation measures necessary to achieve this;
 - Are designed and located to ensure the health and future retention of important landscape features; and
 - Have considered the long-term management and maintenance of any existing and proposed landscaping.
- 6.9.2 Policy SP12 (Green Infrastructure, Landscape and Biodiversity) advises that the Council will accommodate significant growth during the plan period whilst ensuring that the natural

environment is protected and enhanced. This includes through, amongst others, considering and respecting the landscape character, scenic beauty and locally sensitive features, particularly in relation to Chilterns AONB (now National Landscape Area).

- 6.9.3 Policy NE5 (Protecting Open Space) states that planning permission will only be granted for any proposed loss of open space, subject to a number of criterions.
- 6.9.4 Paragraph 135 of the NPPF states that planning decisions should ensure that developments are sympathetic to local character and history, including the surrounding landscape setting, while not preventing or discouraging appropriate innovation or change.
- 6.9.5 The Site is not within a National Park or National Landscape Area. It is within the South Suffolk and North Essex Clayland National Character Area of the East Anglian Plain.
- 6.9.6 A Landscape and Visual Impact Assessment (LVIA) has been prepared as part of this application. In its Screening Opinion of 24 June 2025 (ref 25/00446/SO), the Council determined that the Proposed Development is EIA development. The LVIA has therefore been incorporated into the submitted Environmental Statement (ES). The methodology used in the LVIA should be viewed alongside the following section to understand how the impacts have been considered and assessed.

Landscape and Visual Impact Assessment (LVIA)

- 6.9.7 The LVIA has identified that the Proposed Development would result in a range of landscape and visual effects across the 2km Study Area, with the degree of impact varying in relation to proximity, topography, existing vegetation, and receptor sensitivity. Although the Proposed Development would be visible from the wider landscape, particularly in the early years and from nearby viewpoints such as local PRoWs, the overall effect would be contained and softened by existing landform and vegetation as well as by proposed additional screening planting. The visual influence would be localised, and the design of the infrastructure avoids dominance or incongruity in the wider landscape. Over time, as mitigation matures, the Proposed Development would be absorbed into the field structure.
- 6.9.8 Most receptors would experience Negligible to Minor effects, with Moderate effects arising only in a small number of localised cases during construction or early operational phases, typically where public rights of way pass close to the Site boundaries.
- 6.9.9 The Proposed Development has incorporated extensive embedded mitigation, including strategic siting of infrastructure, retention and enhancement of existing hedgerows, woodland and trees, and substantial new planting. The combination of appropriate siting, low-profile infrastructure, and targeted mitigation measures ensures that effects on both landscape character and visual amenity are limited, localised, and not significant in planning terms. These measures significantly reduce the visibility of the Proposed Development over time. By Year 15, the combination of natural topographic screening and matured vegetation ensures that almost all visual effects are reduced to Minor or Negligible, including at more sensitive locations such as nearby footpaths or isolated dwellings.

- 6.9.10 No landscape character areas, conservation areas, or key viewpoints are subject to Major (significant) effects at any stage of the project lifecycle. Views from heritage assets such as the Cromer Windmill have been assessed with the same landscape and visual impact criteria used to evaluate all other views, which is principally of an ordinarily beautiful landscape with a Medium sensitivity. This is not to say the heritage assets themselves do not carry a high value, but they are assessed on a different basis. There are no significant residual effects predicted in the context of relevant guidance, including the Guidelines for Landscape and Visual Impact Assessment (GLVIA3). The Proposed Development aligns with North Hertfordshire District Council's landscape assessment criteria, including the preservation of valued features and enhancement of local green infrastructure, supporting its overall suitability for the Site.
- 6.9.11 In conclusion, while some temporary adverse effects are unavoidable during construction and early operation, these are localised and reduce substantially with time. The careful design approach and embedded mitigation strategy ensure that the Proposed Development would not result in significant landscape or visual harm and is therefore considered acceptable in planning terms from an LVIA perspective.

Cumulative Landscape and Visual Impacts

- 6.9.12 Alongside the LVIA, the ES provides an assessment of potential cumulative landscape and visual impacts in relation to the proposed Beane Solar Farm (East Herts, ref: 3/24/2245/FUL).
- 6.9.13 The cumulative assessment confirms that while there is another energy-related development within the local landscape context, it is located contiguously to the Proposed Development. The intervening landform, network of hedgerows, woodland belts, and mature tree groups serve to fragment views and limit the extent to which developments are perceived collectively from most public vantage points. Where intervisibility does occur—primarily from elevated or open locations such as sections of the A507 or selected local rights of way—the character of views remains filtered and discontinuous due to the scale of the landscape and the layering of vegetation.
- 6.9.14 Within this cumulative context, the Proposed Development is not considered to contribute to a coalescence or concentration of energy infrastructure such that the receiving landscape becomes defined by a solar or industrialised character. Rather, the siting strategy avoids the most visually exposed field parcels, retains key field patterns and hedgerows, and co-locates infrastructure such as battery storage with areas of existing energy presence, helping to maintain the underlying agricultural character of the landscape and avoid visual saturation.
- 6.9.15 Residual cumulative effects on landscape character are considered to be Minor or Negligible, reflecting the limited geographical overlap of visible influence between the Proposed Development and Beane Solar Farm. The scale of the North Hertfordshire Plateau and Upper Beane Valley landscape character areas ensures that any localised effects are diluted at a broader scale. Moreover, mitigation planting proposed as part of the Proposed

Development—particularly along valley slopes and at key interfaces with public routes—would further reduce intervisibility over time, minimising the extent to which the Proposed Development contributes to a cumulative perception of landscape change.

- 6.9.16 In terms of visual amenity, cumulative effects are similarly assessed as Minor to Negligible for the majority of receptor locations. Only a limited number of viewpoints, notably from sections of the A507 and from select public rights of way near Cromer and Lodge Farm, allow for partial and sequential views of the two Proposed Developments. Even in these locations, the combination of distance, vegetation screening, and the discrete layout of each development prevents the merging of visual form or character into a single, dominant feature. The Proposed Development is visually recessive in form, benefiting from low-profile infrastructure and contextualised siting within a well-defined landscape framework.
- 6.9.17 No cumulative views were identified from scenic viewpoints or nationally recognised recreational routes that would materially degrade their setting or experience. While there might potentially be a perceptible change in views from nearby heritage receptors (Cromer Windmill in particular), these were assessed in terms of landscape and visual effects on the same basis as all other receptors. During construction and early operational phases, these effects will be temporary and reversible and are not considered to result in significant cumulative harm to residential visual amenity or public enjoyment of the landscape.
- 6.9.18 Overall, the cumulative effects of the Proposed Development—both in terms of landscape character and visual receptors—are not considered significant in planning terms. The Proposed Development has been consciously designed to respond to the local landscape's capacity for change, respects existing visual structure and hierarchy, and is set within a wider cumulative context that remains rural and diverse in use and form. When considered in combination with committed schemes, the developments demonstrate a clear avoidance of overdevelopment or landscape saturation, supporting their acceptability under local and national planning policy, including the aims of the North Hertfordshire and Stevenage Landscape Character Assessment.
- 6.9.19 The Proposed Development is capable of being successfully accommodated within the landscape without giving rise to significant cumulative effects. The integrated design, responsive mitigation, and containment of visual influence ensure that the contribution of the Proposed Development to cumulative change is both limited and proportionate. Over time, as mitigation measures mature and the Proposed Development is further assimilated into the local field pattern and vegetation structure, any cumulative effects would diminish further, reinforcing the Proposed Development's compatibility with the receiving landscape and its long-term resilience.
- 6.9.20 In conclusion, the landscape and visual impacts of the Proposed Development, including cumulatively with the proposed Beane Solar Farm, are not significant. The Proposed Development is in conformity with the relevant local policies NE2, NE5, NE12 as well as with the NPPF, in particular paragraph 135.

6.10 Ecology and Biodiversity Net Gain

- 6.10.1 Policy NE4 (Biodiversity and Geological Sites) states that planning permission will only be granted for development proposals that appropriately protect, enhance and manage biodiversity in accordance with the hierarchy and status of designations and features listed in Policy SP12.
- 6.10.2 The policy advises that all development should deliver measurable net gains for biodiversity and geodiversity, contribute to ecological networks and the water environment, and/or restore degraded or isolated habitats where possible.
- 6.10.3 Policy SP12 (Green Infrastructure, Landscape and Biodiversity) states that the Council will accommodate significant growth during the plan period whilst ensuring the natural environment is protected and enhanced. As such, designated sites in accordance with the hierarchy (internationally designated sites to non-designated sites that include important habitats and species) along with biodiversity networks will be protected, enhanced and managed.
- 6.10.4 Policy NE1 (Strategic Green Infrastructure) includes ancient woodlands, biodiversity rich landscapes, other valued landscapes, chalk streams, rivers and valleys and the rights of way network. The policy advises that planning permission will be granted provided that development, in summary, protects, conserves and where possible enhances the Strategic Green Infrastructure Network (SGIN); avoid loss, fragmentation, severance or negative impacts on its function; create new SGIN and provides a plan for its long-term maintenance and management; and suitable mitigation measures or appropriate replacement to satisfactorily address adverse impacts on the SGIN.
- 6.10.5 Paragraph 187 of the NPPF states that planning decisions should contribute to and enhance the natural and local environment by, amongst others, minimising impacts on and providing net gains for biodiversity.
- 6.10.6 Lightrock are committed to enhancing the biodiversity and capital value of sites, being sensitive and complementing nationally and locally protected nature conservation sites. This commitment is enhanced through their corporate partnership with the RSPB. The RSPB provided advice based on the information provided at the time on opportunities for conservation of priority species of conservation concern, such as the Turtle Dove (-98% critical decline in England between 1995-2023), and for providing habitats of higher distinctiveness, including creation of new habitat, enhancement of retained habitats, and aftercare management.
- 6.10.7 An Ecological Impact Assessment has been prepared by Lanpro Services Ltd as part of the application.
- 6.10.8 An Extended UK Habitat survey (UKHab) including protected species appraisal and condition assessment was undertaken in December 2024 (updated in April and May 2025), supported by a desk study. GCN (Great Crested Newt) surveys were undertaken in the form of Habitat Suitability Index (HSI) Assessment followed by eDNA Surveys. Ground Level Tree Assessment, preliminary roost assessment and bat activity surveys (statics and night time walkover) were also undertaken. Winter and breeding bird surveys were conducted, the

detailed results are to be discussed in a separate Bird Impact Report which will be submitted the Council once they have been completed.

- 6.10.9 No statutory designated sites for nature conservation were identified within 10km (Habitats sites ('European sites')) or 2km (National sites). However, there are 40 non-statutory/locally designated sites (Local Wildlife Sites (LWSs)) within 2km. Of these, two are adjacent to the Site (Rydal's and Coldash Woods, also ancient woodlands), and three within the zone of influence for indirect disturbance. There is a veteran tree on-site also in the zone of influence for indirect impacts.
- 6.10.10 Habitats recorded on-site included other neutral grassland (g3c), modified grassland, other broadleaved woodland (w1g), lowland mixed deciduous woodland (w1f7), mixed scrub (h3h), temporary grass and clover leys (c1b), cereal crops (c1c) and other standing water (r1g). There are also lines of trees, six types of hedgerows and ditches on-Site. In respect to Biodiversity Net Gain (BNG), the area-based habitats generated 422.32 Habitat Units (HU) with a total area of 187.37 ha. The total length of hedgerows on-site was calculated at 7.99km and the hedgerow habitats generated 73.53 Hedgerow Units (HeU). The total Watercourse Units (WU) on-Site is 6.15 WU with a length of 1.92 km pertaining to ditches.
- 6.10.11 All habitat losses will be compensated for on-site within the red line boundary. Proposed habitat creation measures on-site include the creation of large areas of grassland beneath solar installations, field margins and other available spaces within the red line boundary, as well as woodland, hedgerow and scrub planting and pond creation.
- 6.10.12 The Proposed Development design has incorporated features for protected species including buffers for ecological features and offsets from development infrastructure. Protected or notable species present (or assumed present) on-site and assessed as being Important Ecological Features (IEF) included roosting, commuting and foraging bats and breeding birds. Species which are not IEFs but still require mitigation for legislative compliance include GCN, badger, and Schedule 1 birds (barn owl and red kite).
- 6.10.13 Compensation includes grassland areas for skylark and other ground nesting birds as well as foraging winter starling. A non-licensed method statement (precautionary method of work) is considered necessary for badger, and GCN. Schedule 1 birds including barn owl and red kite require some timing constraints for works. It is not considered that there would be any residual effects as a result of the Proposed Development.
- 6.10.14 The biodiversity net gain assessment within the Ecological Impact Assessment calculates that the Proposed Development will achieve a 73.3% net gain in habitat units, a 16.57% net gain in hedgerow units, and a 22.34% net gain in watercourse units, all above the 10% statutory BNG requirement.
- 6.10.15 In conclusion, the design of the Proposed Development has avoided the loss and fragmentation of existing ecological habitats, in particular adjacent ancient woodlands; it enhances and connects those habitats; creates new diverse habitats across the Site; and provides a substantial net gain in biodiversity. The Proposed Development therefore complies with local policies NE1, NE4 and SP12, as well as NPPF Paragraph 187.

6.11 Arboriculture

- 6.11.1 Local Plan Policy SP1 (Sustainable Development in North Hertfordshire) seeks to ‘protect key elements of North Hertfordshire’s environment including biodiversity, important landscapes, heritage assets and green infrastructure’, within which trees and hedgerows play a vital role.
- 6.11.2 Local Plan Policy NE2 (Landscape) requires applications to ensure the health and future retention of important landscape features and their long-term management and maintenance.
- 6.11.3 This application is accompanied by an Arboricultural Impact Assessment (AIA) (Lanpro Services), prepared in accordance with BS5837:2012.
- 6.11.4 Within the Site, a total of 190 individual trees, 46 groups of trees and 25 hedgerows were recorded. The majority of these are Category A and Category B, being of high or medium quality, and contributing to the landscape character of the Site.
- 6.11.5 The Proposed Development has been designed to avoid the loss of trees and to avoid incursion into Root Protection Areas where possible.
- 6.11.6 In order to enable two accesses within the Site, small areas of two tree groups (G6 and G26) will be removed.
- 6.11.7 Eleven trees or tree groups will be subject to pruning or crown lifting to enable the Proposed Development.
- 6.11.8 Incursions into the root protection areas of 14 trees or tree groups are required to facilitate the creation of access tracks or the installation of security fences. The impacts of these incursions can be managed through conditioned arboricultural method statements to mitigate any potential for damage, for example by using no-dig cellular tree root protection tracks.
- 6.11.9 Provided that the mitigation and compensation measures outlined in the AIA are followed, negligible arboricultural impacts are anticipated from the Proposed Development.
- 6.11.10 Potential impacts on trees and hedgerows have been fully assessed. The Proposed Development complies with the requirements of policies SP1 and NE2, along with the NPPF.

6.12 Flood Risk and Drainage

- 6.12.1 Policy SP11 (Natural Resources and Sustainability) advises that the Council will take a risk-based approach to development and flood risk, directing development to areas at lowest risk in accordance with NPPF and ensuring the provision of Sustainable Drainage Systems and other appropriate measures.
- 6.12.2 Policy NE7 (Reducing Flood Risk) adds to the above and states that planning permission for development proposals will be granted provided that development is located outside of medium and high risk flood areas and where not possible, a sequential and exception test is demonstrated.

- 6.12.3 Policy NE8 (Sustainable Drainage Systems) advises that planning permission for development will be granted provided that the most appropriate sustainable drainage solution is used, aiming to mimic natural drainage patterns and processes, and follows the SuDS hierarchy.
- 6.12.4 Paragraph 170 of the NPPF states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime, without increasing flood risk elsewhere.
- 6.12.5 Paragraph 173 of the NPPF advises that a sequential risk-based approach should be taken to applications known to be at risk now or in future from any form of flooding. Paragraph 174 states that the aim of the sequential test is to steer development to areas with the lowest risk of flooding from any source and confirms that development should not be permitted if there are reasonable available sites appropriate for the proposed development in areas with a lower risk of flooding.
- 6.12.6 However, Paragraph 175 of the NPPF states that the sequential test should be used if known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk).
- 6.12.7 The Flood Risk Assessment and Drainage Strategy (JPG) (FRA/DS) that accompanies this application demonstrates that the recommended surface water drainage system for the Proposed Development is reasonable and acceptable, and that the Proposed Development does not increase flood risk.
- 6.12.8 The Site is predominantly within Flood Zone 1, with small areas of Flood Zone 2 and 3 which are located through the central section of the Site and which branch off east and west from the central swathe. There are also areas of surface water flood risk.
- 6.12.9 There is no proposed electrical infrastructure within any of the areas of Flood Zone 2 or 3.
- 6.12.10 The FRA/DS considered all potential sources of flood risk to the Proposed Development and concluded that these are considered low from all sources. Overall, this report demonstrates that flood risk to the Proposed Development is considered to be low.
- 6.12.11 The on-site private surface water drainage system will be designed and constructed in accordance with all national and local standards and best practice.
- 6.12.12 Hierarchy for discharge of surface water has been followed, with consideration firstly given to soakaway/infiltration, watercourse, and sewer in that priority order.
- 6.12.13 Discussions with the LLFA regarded a preferred method of discharge are ongoing.
- 6.12.14 Infiltration drainage methods could be suitable on this Site, subject to permeability testing on-site. SuDS infiltration features would be used for the Substation and BESS compounds. This would be in the form of infiltration basins and swales.

- 6.12.15 Alternatively, should infiltration drainage methods prove not to be suitable this may result in the Substation/BESS compound requiring further drainage infrastructure to be constructed as part of the wider watercourse/land drainage system.
- 6.12.16 Any discharge into the existing watercourses or the land drainage system would be restricted to the calculated greenfield runoff rate of 1.700l/s/Ha based on the impermeable area and shall connect into the existing watercourse catchment.
- 6.12.17 Attenuation storage if required for the Substation and BESS compound will be provided in the granular matrix and attenuation swales and basins.
- 6.12.18 The Proposed Development complies with local policies SP11, NE7 and NE8 and relevant national policies in relation to flood risk and drainage.

Sequential Test and Exception Test

Sequential Test

- 6.12.19 As a small part of the Site is located within Flood Zones 2 and 3, the NPPF at paragraph 175 requires that a sequential test be carried out in this circumstance.
- 6.12.20 The NPPF at paragraph 174 states that the *'aim of the Sequential Test is to steer new development to areas with the lowest risk of flooding from any source'*.
- 6.12.21 Further guidance is provided by PPG, 2.4.1 Paragraph 024 Reference ID: 7-024-20220825, adding that *'where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:*
- *Within medium risk areas; and*
 - *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.'*
- 6.12.22 The definition of *'reasonably available sites'* is provided in PPG Paragraph 028 Reference ID: 7-028-20220825, as being *'those in a suitable location for the type of development with a reasonable prospect that the site is available to be developed at the point in time envisaged for the development'*.
- 6.12.23 As set out in Section 6.3 above, the assessment of site suitability included distance from the grid connection point, site capacity, Green Belt, agricultural land classification, proximity to heritage assets, proximity to woodland and designated ecological sites, as well as flood risk.
- 6.12.24 Within the study area, the Applicant identified two potentially suitable sites. Only one landowner was interested in using the landholding for solar development. This landholding was carried forward and now constitutes the application Site. It therefore considered that the Site is the only reasonably available site for the Proposed Development.

Exception Test

- 6.12.25 NPPF paragraph 177 states that *‘Having applied the sequential test, if it is not possible for development to be located in areas with a lower risk of flooding (taking into account wider sustainable development objectives), the exception test may have to be applied. The need for the exception test will depend on the potential vulnerability of the site and of the development proposed, in line with the Flood Risk Vulnerability Classification set out in Annex 3.’*
- 6.12.26 The Site includes areas classed as Flood Zone 3 and it has not been possible to locate the development in an area of lower risk of flooding.
- 6.12.27 Annex 3 of NPPF classifies solar farms as *‘essential infrastructure’*.
- 6.12.28 Table 2 of PPF Paragraph 079 Reference ID: 7-079-20220825 indicates that for essential infrastructure within Flood Zone 3, and Exception Test is required, while for development of that nature within Flood Zone 2, it is not required.
- 6.12.29 The most recent updates to Environment Agency flood mapping show that some areas within the Site are classified as Flood Zone 3. It is therefore appropriate to review the compliance of the Proposed Development with the Exception Test.
- 6.12.30 NPPF paragraph 174 sets out that *‘To pass the exception test it should be demonstrated that:*
- a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and*
 - b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall.’*
- 6.12.31 The wider sustainability benefits of the Proposed Development are set out through this Statement. Section 6.1 above demonstrates the contribution the Proposed Development will make to national climate change targets. Section 6.10 above describes the significant ecological benefits. In terms of flood risk, the Proposed Development has been subject to a detailed and sensitive iterative design process which has resulted in embedded mitigation measures which results in negligible flood risk. Notably, all of the proposed infrastructure (solar panels, BESS, related equipment) is located within Flood Zone 1. The wider sustainability benefits to the community outweigh any increase in flood risk. This aspect of the exception test is therefore satisfied.
- 6.12.32 This application is accompanied by a Flood Risk Assessment and Drainage Strategy which considers flood risk from all sources and sets out mitigation measures to ensure that the Proposed Development will be safe over its lifetime and will reduce flood risk overall.
- 6.12.33 The Proposed Development meets the requirements of both limbs of the Exception Test and can therefore be considered to pass the Exception Test.

6.13 Transport and Access

- 6.13.1 Policy T1 (Assessment of Transport Matters) advises that planning permission will be granted provided that, in summary, development would not lead to highway safety problems or cause unacceptable impacts upon the highway network; mechanisms to secure any necessary sustainable transport measures/improvements are secured; suitable Transport Statements/Assessment and/or Travel Plans are provided; and for major developments, applicants demonstrate a number of sustainable transport methods are available/provided, as applicable.
- 6.13.2 Paragraph 116 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network, following mitigation would be severe, taking into account all reasonable future scenarios.
- 6.13.3 A Transport Statement (TS) and a Construction Traffic Management Plan (CTMP) have been prepared by Andrew Moseley Associates, and are submitted as part of the application.
- 6.13.4 The primary point of access will be taken from Cromer Heath at the junction with the A507. Two further access points will connect the Site with the A507 along the northern boundary of the Site (secondary and tertiary accesses), to be used to supplement vehicle access to the Site. Neither of the secondary or tertiary Site accesses will be utilised for deliveries from articulated HGVs. The tertiary Site access will not be used during construction.
- 6.13.5 Traffic management will be put in place during the construction phase to reduce any potential conflicting manoeuvres.
- 6.13.6 The Proposed Development is anticipated to generate an estimated 40 two-way trips per day during the busiest delivery period. This is anticipated to last for approximately 8-12 months out of the total 12-18-month construction programme.
- 6.13.7 Swept path analysis has been undertaken of the proposed Site access and internal road layout to demonstrate that an articulated vehicle will be able to access and egress the Site in a forward gear. Swept path analysis has also been conducted for a fire tender for the internal Site layout to ensure the vehicles can access all parts of the Site when operational.
- 6.13.8 A Construction Traffic Management Plan has also been prepared by Andrew Moseley Associates and is submitted as part of the application.
- 6.13.9 The Transport Statement has demonstrated that the traffic associated with the Proposed Development can be accommodated on surrounding highway network without having a severe impact in accordance with the NPPF, including in the case where construction of the Proposed Development overlaps with that of Beane Solar Farm (East Herts, ref: 3/24/2245/FUL).
- 6.13.10 The Proposed Development fully accords with both national and local transport policy.
- 6.13.11 Therefore, there are no overriding traffic and transportation reasons preventing the local highway authority from recognising that the proposals are acceptable nor why planning permission could not be granted.

6.14 Noise

- 6.14.1 The NPPF references the impacts of noise which need to be avoided and mitigated in paragraphs 187 (e) *“preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.”* Paragraph 198 (a) *“mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life” and (b) identify and protect tranquil areas which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason;”*
- 6.14.2 Local Plan Policy D3 relates to protecting living conditions and ensuring that developments do not cause unacceptable harm to living conditions. If there is harm, then mitigation needs to be secured to ensure that the harm is brought to an acceptable level.
- 6.14.3 A Noise Impact Assessment (Metrica) has been prepared and accompanies this application and considers the operational noise from the Proposed Development. It finds that the operational noise levels will be below the levels at which adverse impacts will occur at all of the assessed noise sensitive receptors during the day. Due to the low background noise levels at night, Noise Rating (NR) curve assessment of the predicted noise levels was undertaken and has found that all internal predicted noise levels are lower than NR20 in all cases (NR20 is typically used by Local Authorities for the assessment of internal noise within bedrooms during night-time periods).
- 6.14.4 Construction effects have been considered, and application of the best practice measures detailed in the Noise Impact Assessment will ensure that potential effects are minimised as far as reasonably practicable, and that the construction process is operated in compliance with relevant legislation.
- 6.14.5 Cumulative construction noise effects would only arise where noise-generating activities associated with both the Proposed Development and Beane Solar Farm - including construction plant operation and construction vehicle movements - occur at the same time. In practice, while overall construction programmes may overlap, it is unlikely that noise emitting activities would occur simultaneously in close proximity to the same receptor.
- 6.14.6 Notwithstanding the above, where construction activities associated with the Proposed Development are likely to occur concurrently with the construction of Beane Solar Farm, the potential for cumulative noise impacts will be undertaken by the contractor. Where required, the contractors will implement additional mitigation measures, for example such as phasing deliveries and construction activities to avoid concurrent working.
- 6.14.7 The Proposed Development has therefore been found to be acceptable in terms of noise and found to be in compliance with Local Plan Policy D3 and the NPPF.

6.15 Agricultural Land Classification

- 6.15.1 The ALC Assessment (Amet Property) submitted as part of this application confirms that the Site is in its majority Grade 3b or lower (61.9%). Approximately 38.1% of the Site is located on BMV land (Grades 2 and 3a). Table 6.1 below sets out the areas and percentages of BMV within the Site.

Table 6.1 Agricultural Land Grade

Agricultural Land Grade	Hectares	Percentage (%)
2	43.5	23.3
3a	27.5	14.8
3b	96.6	51.8
Grade 4	18.8	10.1
Non-agricultural	0.1	0.0
Total	186.4	100
Total BMV land	71.0	38.1

- 6.15.2 It is worth noting that the total area surveyed is slightly larger than the Site boundary as the survey area includes elements such as the woodland and farm buildings which don't form part of the application Site.
- 6.15.3 Chapter 15 of the NPPF relates to conserving and enhancing the natural environment. Paragraph 187 states that planning decisions should contribute to and enhance the natural environment by recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services, including the economic and other benefits of best and most versatile agricultural land.
- 6.15.4 Footnote 65 of the NPPF states that where significant development of agricultural land is demonstrated to be necessary, areas of poorer quality land should be preferred to those of a higher quality.
- 6.15.5 NPS EN-3 is also an up-to-date expression of national policy. Sections 2.10.29 – 2.10.34 provides narrative on solar and use of agricultural land.
- 6.15.6 Local Plan Policy NE12 seeks to determine applications for solar farms on the best and most versatile land (BMV) in accordance with national policy.
- 6.15.7 In the pre-application comments from the Council, it was requested that consideration be given to soil handling and soil protection. The Applicant is content that this can be secured via a planning condition requiring a soil management plan to be submitted and approved prior to commencement of development on Site.

Temporary use of Best and Most Versatile Land

- 6.15.8 As stated in the above section, while national and local policy seeks to ensure that careful consideration is given to the use of BMV, there is no prohibition on the use of BMV land. The NPPF does not prescribe a weight or harm that should be given to the use of BMV for

purposes other than food production nor does it set out a policy test for the use of BMV to be demonstrated as acceptable.

- 6.15.9 As in the NPPF, EN-3 notes a preference for use of poorer quality land and asks applicants to avoid BMV “*where possible*”, it also states that “*the development of ground mounted solar arrays is not prohibited*” on BMV, and that “*land type should not be a predominating factor in determining the suitability of the site*”. In addition, it states that consideration may be given as to whether the proposal allows for continued agricultural use and/or can be co-located with other functions (for example, battery storage) to maximise efficiency. The Proposed Development does this.
- 6.15.10 The Proposed Development does not constitute a permanent loss of any agricultural land and there will be continued agricultural use on the Site through sheep grazing and on the areas of land which are proposed for skylark mitigation. The substation and BESS (which give rise to a more intensive development of the land) have been micro sited so that they are located in the areas of lower grade agricultural land within the Site i.e. they have been directed towards the poorer quality areas of land allowing the better quality agricultural land to continue in agricultural land use with the co-located solar.
- 6.15.11 The land will be returned to its prior agricultural use 40 years after energisation, once the Proposed Development is decommissioned.
- 6.15.12 The principle of renewable energy on BMV land has been established in the post-2024 NPPF context. In appeal decision APP/Q3115/W/24/3350890, the Inspector accepted the that the scheme, which comprised of 100% BMV, was justified. The Inspector deals with the temporary time period of 40 years and they conclude in paragraph 25 that:
- “The proposal would change the use of the land for a period of 40 years. Whilst this is a significant period of time it is not permanent. Moreover, although it would be taken out of arable production, it is proposed that the land would be used for both energy production and sheep grazing. This dual use can be secured by condition. Apart from the small areas of land used for fixed infrastructure, which amount to approximately 1.8ha, the majority of the land would still be used for some agricultural use.”*
- 6.15.13 In summary, the Inspector concluded that:
- “The proposal would not result in the loss of, or have an unacceptable impact on, BMV land. The land could continue to be used for agricultural purposes alongside the production of renewable energy and could return fully to agricultural use at the end of the lifetime of the development.”*
- 6.15.14 The Defra UK Food Security² report notes that the main risks to UK food security include climate change and soil degradation. Land use change is not identified as a risk to UK food security. Development of a solar farm addresses climate change risks. Indeed, in the Solar Roadmap (June 2025)³ the Government reiterates that climate change is the biggest risk to

² Department for Environment, Food and Rural Affairs, ‘UK Food Security Report 2024’, available at: https://assets.publishing.service.gov.uk/media/6756e355d89258d2868dae76/United_Kingdom_Food_Security_Report_2024_11_dec2024_web_accessible.pdf

³ <https://www.gov.uk/government/publications/solar-roadmap>

food security. In Appendix II “Solar Misconceptions”, against the heading of “solar is a threat to food security”, the following points are notable:

“The biggest threat to food security is crop failure due to climate change and solar farms are helping to tackle this directly.

Recent UK Government analysis shows that even under the most ambitious deployment scenarios set out in the Solar Roadmap, and in the unlikely case that all new capacity coming forward is ground mount, it would only occupy up to around 0.6% of UK Utilised Agricultural Land by 2030 (less than that used by golf courses in Great Britain).

Solar farms are a temporary and completely reversible land use with restoration of land at the end of the solar farm’s life usually guaranteed by a planning condition”.

- 6.15.15 It is clear that the Government recognise that the best way to enable food security, is to tackle climate change.
- 6.15.16 In addition, the extended fallow of arable land reverted to grassland within the solar farm area enables a recovery of soil health that has been depleted through arable management.
- 6.15.17 In summary, there is no local or national policy that prohibits the use of BMV land for such development; it is a matter to be weighed in the planning balance. In line with the NPPF and the NPS, the Applicant has sought to use the poorer quality agricultural land available on Site for the more developed areas of the proposals allowing agriculture to continue in the form of sheep grazing (in and around the solar panels) and crops (on the skylark mitigation areas) on the better-quality land. As the Proposed Development includes co-located BESS, the Applicant has demonstrated that they seek to maximise efficiency of such land use (in line with EN-3). As the Proposed Development would not lead to the loss of BMV land, the land would be available for agricultural use after the Site is decommissioned with no material effect on, and possibly even a benefit to, the soil condition. The development of Westfield Energy Conservation Park seeks provide energy security while addressing climate change risks and therefore benefits longer term food security and aligns with the Government’s Solar Roadmap.
- 6.15.18 It is therefore considered that the Proposed Development is compliant with Policy NE12 and the NPPF.

7 Conclusion and Planning Balance

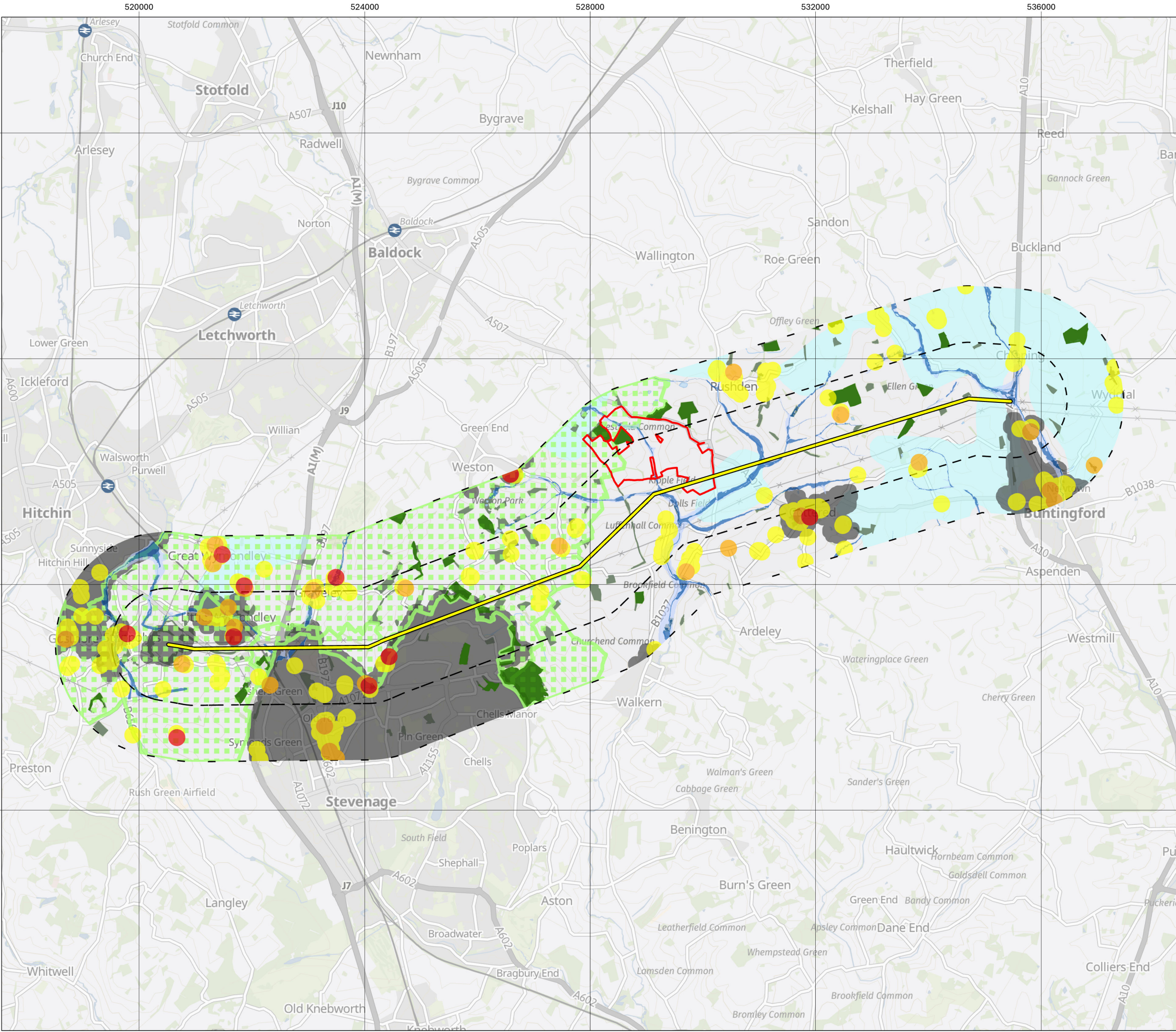
- 7.1.1 This Planning, Design and Access Statement has been prepared by Lanpro Services on behalf of the Applicant Lightrock Power, to accompany a full planning application for Westfield Energy Conservation Park which incorporates a Battery Energy Storage System (BESS), co-located ground mounted solar farm, associated infrastructure, access, biodiversity enhancements and landscaping (the 'Proposed Development') on land south of A507 at Westfield Common, Hertfordshire.
- 7.1.2 In National Policy Statement EN-1, the UK Government has identified that there is a critical national priority (CNP) for the provision of nationally significant low carbon infrastructure (all onshore and offshore electricity generation that does not involve fossil fuel combustion) such as the Proposed Development. Recognising solar farm developments as Critical National Infrastructure, EN - 1 (para. 4.2.4 – 4.2.5) provides clear presumption in favour of renewable energy generation developments which provide a clean, low cost and secure source of electricity to support decarbonisation of the energy industry.
- 7.1.3 The Proposed Development supports the UK Government's legally binding commitment to achieve a fully decarbonised electricity system by 2035 and represents a meaningful contribution to national renewable energy targets and the transition to a low-carbon economy.
- 7.1.4 Good design has been embedded into the Proposed Development from the outset of the site selection process with the search process seeking to avoid areas of higher landscape, heritage, ecology and flooding sensitivity,. At a site-specific level, a comprehensive mitigation package has been embedded into the design of the Proposed Development to date with further commitments made to minimise any likely significant impacts.
- 7.1.5 Within the Site there will be 112.2ha (60%) of built electrical infrastructure (i.e panels, BESS and substation), the remaining 75.1ha (40%) will be used for ecological, biodiversity and landscaping enhancements.
- 7.1.6 In respect of Landscape and Visual impacts, the LVIA and CLVIA have concluded that the Proposed Development is capable of being successfully accommodated within the landscape without giving rise to significant standalone or cumulative effects. The integrated design, responsive mitigation, and containment of visual influence ensure that the contribution of the Proposed Development to cumulative change is both limited and proportionate. Over time, as mitigation measures mature and the Proposed Development is further assimilated into the local field pattern and vegetation structure, any cumulative effects would diminish further, reinforcing the Proposed Development's compatibility with the receiving landscape and its long-term resilience.
- 7.1.7 The Flood Risk Assessment and Drainage Strategy which accompanies the application has considered flood risk from all sources and sets out mitigation measures to ensure that the Proposed Development will be safe over its lifetime and will reduce flood risk overall. The Proposed Development meets the requirements of both limbs of the Exception Test and is considered to pass the Exception Test.

- 7.1.8 The Transport Statement has confirmed that safe access for construction and operational traffic can be taken into the Site from the public highway. Mitigation measures will be employed to ensure construction traffic is managed appropriately.
- 7.1.9 Assessments have confirmed that the Proposed Development is acceptable in terms of noise and no additional mitigation is required. There will also be no significant impact to surrounding receptors regarding glint and glare as extensive landscaping and forward planting ensures the glare is acceptable in terms of standard assessment criteria. Only short lengths of hedgerow and small areas of tree groups will be removed to facilitate the creation of access tracks and the installation of fencing, with no unacceptable impacts on trees. There will be no impacts on the ancient woodlands located adjacent to the Site.
- 7.1.10 Ecologically, there will be no significant effects to designated ecological sites or protected species, as identified within the Ecological Impact Assessment (EcIA). The Proposed Development will achieve a 73.3% net gain in habitat units, a 16.57% net gain in hedgerow units, and a 22.34% net gain in watercourse units, all above the 10% statutory BNG requirement, which is a significant benefit of the proposals and should be afforded considerable weight in the planning balance.
- 7.1.11 The Applicant acknowledges that a part of the Site, 38.1%, is BMV land that will be temporarily used for the purposes of accommodating the Proposed Development. Agricultural activities will continue alongside the generation of electricity; sheep will graze the land under the panels. In addition, the Applicant has sought to minimise the use of BMV through Site design. Decommissioning of the Proposed Development will allow a return to arable management of the land with the potential benefit of recovered soil health from resting the land. The significant public benefits of the Proposed Development that have been set out, outweigh the temporary and reversible use of this small area of BMV agricultural land for the duration of the Proposed Development.
- 7.1.12 The conclusions of the Historic Environment Desk-Based Assessment demonstrate that there is less than substantial harm, at the lower end of the scale, to the Site of Cumberlow Manor House Scheduled Monument and Cromer Windmill. A series of measures are outlined in the Desk Based Assessment which provide a range of methods that can be utilised to avoid or sensitively design around any areas of archaeological interest.
- 7.1.13 These limited impacts should be weighed against the many significant positives that the Proposed Development will provide including the considerable biodiversity net gain and critical provision of clean renewable energy. The imperative to tackle climate change, and quickly, which is recognised in recent legislation, energy policy, and numerous appeal decisions, means that the very significant benefits of the Proposed Development clearly and decisively outweigh the limited harm.
- 7.1.14 The Proposed Development brings numerous economic benefits to the local area which are to be afforded significant weight in the planning balance.
- 7.1.15 There will be job creation during the construction phase; whilst a temporary benefit over a relatively short time period, this will still be of economic benefit. The Proposed Development provides the landowner with diversification to their farming business which

allows them future security to maintain farming on other parts of their holding, which ensures the farming business is maintained for future generations. Once operational the Proposed Development will be contributing business rates to the Council and will likely be in the region of around £250,000.

- 7.1.16 In a policy context, it is clear that the principle of the Proposed Development is supported by the NPPF and that material considerations weigh heavily in favour with significant weight being afforded to them. The NPPF requires that development proposals that accord with an up-to-date Development Plan should be approved without delay; the policy assessment set out above in Section 6 demonstrates that the Proposed Development accords with all relevant policies of the Development Plan.
- 7.1.17 The Proposed Development represents a sustainable and policy-compliant proposal (achieving economic, social and environmental gains) that will make a significant contribution to national and local renewable energy objectives. It aligns with the National Planning Policy Framework (NPPF), which prioritises the transition to a low-carbon economy, and supports North Herts Council's climate change commitments by delivering renewable energy infrastructure and, in accordance with paragraph 11 of the NPPF, should be approved without delay.

Appendix 1 Site Suitability Figures



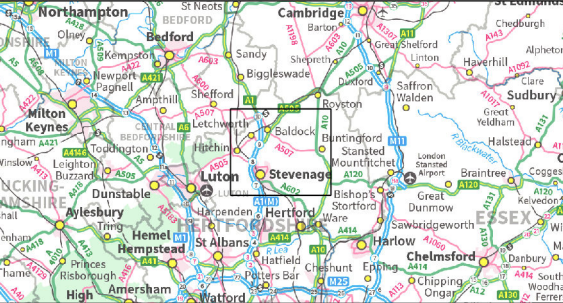
Westfield Energy Conservation Park

Document:
Planning, Design and Access Statement

Title:
Figure 6.1 Environmental and Planning Constraints

- Legend:
- Application Site Boundary
 - 400kV Overhead Line
 - 1km Study Area
 - 2km Study Area
 - Built-up Area (100m Buffer)
 - Listed Building (150m Buffer)
 - Grade I
 - Grade II*
 - Grade II
 - Surface Water Area
 - Ancient Woodland
 - Woodland
 - Provisional Agricultural Land Classification Grade 2
 - Green Belt
 - Flood Zone 3
 - Flood Zone 2

Data: National Grid, Natural England, Ordnance Survey, Office for National Statistics, Forestry Commission, Lanpro, 2025
Base map: Contains OS data © Crown Copyright and database right 2025
Contains data from OS Zoomstack



Drawing no.: P5686_LPR_ZZ_XX_DR_Z_SSA_0074
Coordinate system: British National Grid
Scale: 1:64,141 @ A3

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REV	DATE	STATUS	DRW	CHK	APR

