



Appendices to Proof of Evidence of Valerie Scott, HCUK Group on behalf of Aldenham Parish Council

September 2022 | Project Ref 8229A

HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. We began life as Heritage Collective LLP in 2010, before becoming Heritage Collective UK Limited in 2014. Finally, in 2020, we became HCUK Group Limited.



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Appendix 1

21/0050/FULEI – Aldenham Parish Council Comment

We strongly object to this application. As part of our consideration of this application we have had the input and assistance of a planning consultant who has analysed the application. The report from David Lane of DLA dated February 2021, is attached as part of our objection.

In summary the following are identified as grounds for refusal:

1. **Impact on Public Rights of Way.** The proposal will have an undue impact on the users of the Public Rights of Way across the site in question. Point 7.0 (Issue no 2) in the attached report.
2. **The proposals will not aid farm diversification and the rural economy.** This is detailed in section 8.0 (issue 3) of the attached report. The HBC site allocation and development plan 2016 precedes the NPPF by 3 years. Section 8 provides commentary on the soil classification and highlights that the land could be Grade 1 without the soil wetness factor. This could presumably be achieved with better drainage systems. It is also worth pointing out that the applicant hasn't tested the soil in accordance with defra guidelines (1 per hectare not 1 per 4 hectares as the applicant has done). Local knowledge of the intensive level and type of crops grown on large areas of the site would indicate significant areas are at least a Grade 3a classification. As the consultant's report highlights, much land in Hertsmere falls into Grade 3 and land in Grade 3b can be considered to be of moderate sensitivity and a valuable resource.
 - The proposal would reduce the ability of the site to grow crops and over such a large site the proposal would appear to be arable/crop displacement rather than farm diversification.
 - The impact of the proposals will be negligible on the rural economy. 2 maintenance visits per month are not going to generate any benefit.
 - The soil health of the land could be improved by other methods, without the intervening development of the site as a solar power plant.
3. **Inappropriate development in the Metropolitan Green Belt which is not outweighed by other factors.** Section 9 of the attached report highlights why this is so. The applicant admits that the development is inappropriate development. It is worth highlighting the following points:
 - the proposals including 3300 cu.m of buildings, combined with the security fencing of 2.2m must have a substantial impact on and cause significant harm to the openness by reason of its spatial aspect and the industrial nature of the proposed buildings. Consequently, the land would not be kept permanently open.
 - The green belt serves 5 purposes and the land in question scores highly in 'assisting in preventing neighbouring towns from merging' and assisting in safeguarding the countryside from encroachment. The relatively high scores for these factors is indicative of the substantial harm the proposed development would cause.
 - Great emphasis is placed on the theoretical amount of renewable electricity generated in Hertsmere. Most renewable electricity is wind driven and there

is nothing in government policy that requires local planning authorities to be self-supporting in energy production.

- Lack of alternative sites is due to the search being driven by a desire to be within 5km of the Elstree substation is a weak argument. A UK wide search would be entirely appropriate for electricity generation and so little weight can be given to this argument.
- Temporary and reversible impacts is covered by the relevant PPG which recognises that duration of a development and its remediability is a factor to be taken into account. The applicant refers to 'operational' years which means the 35 years is a minimum. **This cannot be considered temporary.**
- Other considerations do not outweigh the totality of the harm caused by the proposals. **Very Special circumstances do not exist and so the application should be refused permission.**

Additional points raised by APC

1. Public consultation - this has been totally inadequate and disingenuous. To move a significant application such as this during the Covid pandemic when the public cannot be fully and properly engaged is totally unreasonable and taking advantage of the situation. Zoom presentations such as that given to APC lacked detail on the installation and impact on PRow. Many of the public will have been unable to access such meetings even if they knew about them. One public Zoom presentation was insufficient especially when much of the Parish was not made aware. The applicant advises it dropped leaflets to 500 households. Strangely none of these were to residents of Radlett, not even those backing onto fields overlooking the site. Presumably this was to avoid attention being drawn to the proposals and limiting public dissent. This application should have waited until public meeting could be held and the wider public engaged. As such very little weight can be given to the quantum of feedback from such limited public consultation. The level of objections generated to date by the application is a better indication of public feeling and no doubt with proper public engagement the level of public dissent will be much greater

2. It is clear from various research that solar panels in the UK climate are an inefficient way to produce electricity and presumably why the UK government has placed emphasis on wind power. The government paper produced in November 2020 titled 'Ten Point Plan for a Green Industrial Revolution' makes no mention of the use of solar power. Point 9 covers 'Protecting our natural landscapes' and Point 10 'Green Finance and Innovation', highlights ten priority initiatives for the new net zero fund to invest in which does not include solar.

[Website for government 10 POINT PLAN BOOKLET.pdf](#)

The applicant states in the environmental statement (non-technical) 3.3 The Proposed Development "It proposes the use of the best available technology, delivering greater levels of solar efficiency by utilising bifacial panels which increase continuous electrical productivity by 4% when compared to traditional monofacial systems".

However, this application uses fixed panels without tracking which is cheaper and **is not the best technology**. The most efficient capture of solar energy is

dependent on the solar panel tilt to be perpendicular to the sun at all times. Fixed systems fail to achieve this due to the shifting positioning of the sun at different times of the day and per season.

[Website link to information on solar panels](#) panels

3. Footpaths and Bridleways. We have noticed that not all footpaths have been included in the proposals. For example, the historically established route across field 12 has been omitted, no doubt so the whole field can be covered in panels. This is a well-established route used by many locals.
4. Visual impact seems to have been assessed from only 12 points over the 300 acres. This is totally inadequate and has excluded some key vantage points, for example along the heavily used Footpath 17 leading from Batlers Farm to Watling street.
5. The impact of noise from plant and equipment will be significant to both walkers and wildlife. The inverter/transformer stations distributed around the fields do not seem to be designed to prevent noise emissions.
6. The impact on wildlife has been referred to but it doesn't take into account larger mammals such as foxes/muntjac deer whose ability to roam will be significantly affected. The security fencing as shown on the plans would not allow anything other than small creatures such as mice to pass through. The plans mention larger entrances being made in the fencing as required but an inadequate provision.
7. In assessing the environmental benefits of solar panels, the life cycle should be looked from how and where they are manufactured to the cost and impact of decommissioning.
8. The prospect of the land be returned to agricultural use after a minimum of 35 years will be negligible. Who will enforce or recall such a planning condition, the costs of decommissioning will most likely far outweigh future income flows from growing crops. In effect building this solar power plant will result in 300 acres of green belt being turned into industrial land.
9. The proposals do not consider the fact that a large area of land between Watling street and common lane is currently being considered by Hertsmere for land allocation to housing. The proposal known as R2 will mean further green belt being swallowed up alongside this scheme.
10. The Solar Plant will have a negative effect on the five Schools which surround this green belt land. In particular, The Haberdashers' Aske's Boys School, The Haberdashers' Aske's School for Girls and Aldenham School all of which use this open space for recreation including the likes of cross-country and Combined Cadet Force activities. The possible continuous hum from the equipment and heat that the solar panels would generate could also be considerable for the many thousands of children that attend these Schools. Furthermore, the fact that the visual impact will change so dramatically from the

openness of the green belt which it is now, to what amounts to a fenced industrial site, is unacceptable.

11. The proposals are in breach of the Radlett neighbourhood plan policy GA1 Walking and Cycling Networks as 'Development that reduces the quantity, functionality and/or quality of walking and cycling networks would not be supported'.

12. The Lead local flood authority comments say that the submitted flood report does not comply with the PPG (as revised 6 April 2015) to the NPPF, and there are potentially many factors that need to be looked into in order to minimise flooding. In order to overcome an objection, the applicant should have to deal with the points the Sustainable Drainage Officer has made, for proper assessment. It mentions water displacement and surface water overflow, and how the information in the application is lacking and could affect flooding. There is a blatant omission of number of posts, CCTV cameras & road lengths on the site and calculations regarding these and the volume of the substances used to support them which would affect flooding on & around the site. The volume of concrete for one CCTV support is 60X45xx45 cm³. From a chart obtained from Peter Elms from Alpaca, the total length of internal roads on site will be 3375.35m approx. 2 miles. From drawing Hf5.0 we can work out the maximum volume to be excavated - W 3.5-6m x D .8m x L 3375.35m =16,200 m³, which is larger than 6 Olympic swimming pools. This soil will be excavated, disposed of and replaced by concrete, aggregate and geotextile. This fact alone will have an effect on water displacement, drainage and overflow.

13. Elstree Green have applied to the National Grid for not only 49.9MW in 2025 but a further 7.1MW in 2027 showing the cumulative total capacity to be 57MW. There are screen shots and links below showing this.

[Website link to National Grid register](#) register

Presumably this because the applicant does not want the application to go straight the Secretary of State. Where will the addition of 7MW be or will it be in a new field, and where is that? This needs to be answered? This approach compounds the disingenuous nature of the application.

14. With this application for inappropriate development in the Green Belt, clearly not meeting the high levels of justification required to show the 'very special circumstances' needed to develop such a scheme in the Greenbelt; Hertsmere must not allow this scheme to proceed. If they do it will breach their and government policies and create precedent for the rest of the Metropolitan Green Belt and elsewhere to be destroyed in a similar manner.

Appendix 2

Planning Report of David Lane, DLA



Planning Report of David Lane BSc (Hons)
Dip TP, DipTP, MRTPI, FRSA

Proposed Solar Farm and Battery Storage

Hilfield Farm, Radlett

LPA Ref: 21/0050/FULE1
DLA Ref: 21/047

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2.0 SITE & SURROUNDING AREA

- 2.1. The application site is located in open countryside between Radlett to the north, Borehamwood to the east, Elstree to the south and Watford to the west. It is split into two parcels totalling some 130 hectares. The western parcel is contained by the A41 to the west and Elstree Aerodrome to the south. The eastern parcel abuts Watling Street to the east and Butterfly Lane to the south.
- 2.2 The land is agricultural in character and variously described in the application documents as:

“...within an agricultural landscape...”

“The site is semi-suburban in character...”
(Planning Statement)

“...semi-rural in character with some localised intrusion of man-made features.”
“...wholly comprises.....agricultural land...”
(Design and Access Statement)

- 2.3 The Applicant’s Planning Statement analysed the impact on the Green Belt and references the Hertsmere Borough Council Green Belt Assessment 2017, the application site falling within Green Belt Parcels 9 and 19. This assessment notes that approximately 7% and 3% respectively of the Parcels are covered by ‘built form’.

on the road every year. It is estimated that the solar farm would increase the total amount of renewable electricity generated in Hertsmere from 5.4% to 20%. (Ofgen calculates that, in Quarter 3 of 2020, 40% of the electricity supply within the UK was produced by renewables, mainly driven by high volumes of wind generation.)

5.0 PLANNING CONSIDERATIONS

5.1 In the context of the NPPF and development plan, I consider that this application raises the following issues:

1. Would the proposal have an undue impact on the character of the landscape in the area?
2. Would the proposal have an undue impact on users of the Public Rights of Way which cross the site?
3. Would the proposal aid farm diversification and the rural economy?
4. As inappropriate development in the Metropolitan Green Belt, are there other considerations which outweigh the defined harm and any other harm.

Taking each in turn below:

1. Hilfield Lane -Medium
2. Letchmore Heath -low/Negligible
3. Bushey - Negligible
4. Butterfly Lane -Medium
5. Aldenham Road –Medium
6. Watling Street -Medium

6.6 In the longer term i.e. 10 – 25 years, the magnitude of change effect is Low (Small) or Negligible. In terms of the significance, i.e. importance, of the effect on the view, this is a factor combining the Magnitude of Effect with the Sensitivity of the particular landscape, which, in the case of the application site, does not have any protected landscape designation, and so provides a Significance in the long term of Moderate from Hilfield Lane to Slight for the remaining viewpoints.

6.7 Consequently, the landscape consultants were able to conclude that, whilst there would be an adverse impact on the landscape resulting from the proposal:

“For visual receptors in the immediate vicinity of the site, (i.e. within 150m), effects would range from Moderate to Slight Adverse”,

“All other visual receptors would experience Negligible visual effects.”

6.8 **An analysis of Issue 1.** The application proposes to site 3m high by 31m wide solar arrays, 36, 2.9m high containers and two other 4.2m high buildings in various locations on 130ha of agricultural land, located within the Borehamwood Plateau Landscape Character Area (LCA) of the Hertfordshire Landscape Assessment. The application site forms an area of relatively flat land within this large swathe comprising the plateau. The site has a gently undulating character of agricultural fields to the eastern parcel, with the western parcel having a bowl-like landform as it rises up to Elstree Aerodrome. This landform, as it is not overlooked from higher ground, and the existing screening serve to limit views into the application site.

6.9 The application proposals would not result in the loss of any existing hedgerows or individual trees, and would be enhanced with new planting and/or a relaxation of the existing management regime.

6.10 Given the small scale and mass and the relatively low height of the proposals and their dispersal throughout the site, with existing and proposed landscaping restricting views from the wider area, I consider that the landscape consultants are right to conclude that, whilst the

proposals would by definition have an adverse visual impact, the significance of the impact on viewers within 150m of the site would range from Moderate to Slight Adverse but beyond this all other viewers would experience Negligible visual effects. Consequently, I consider only limited visual harm would be caused to the Green belt.

being chosen, if such is available in this urban edge location, or result in people being deterred from walking at all.

7.6 In combination I consider these two factors of visual harm and the containment of the PROW within high fences would have an adverse impact on the recreational value of these highways. Great weight should be placed on this harm.

8.0 Issue 3. Would the proposal aid farm diversification and the rural economy?

8.1 **The Applicant's Case.** The Applicant argues that the proposal would aid farm diversification and the rural economy. The NPPF at paragraph 83b, and the development plan, encourage "*diversification of agricultural and other land-based rural businesses*" which is "*sensitive to its surroundings*" and "*also encourages the use of previously developed land*".

8.2 As accepted by the Applicant, the use would relate to 130ha of agricultural land divided into 20 fields and currently used mainly for production of arable crops. Should the application scheme proceed, development would be reversible, allowing the agricultural use to recommence at a later date. During the period the development was operational, the Applicant considers that the soil health and soil organic carbon can be improved through land use change from "*intensive arable to grasslands*". Once developed, the Applicant notes the potential for low intensity sheep grazing.

8.3 Agricultural land can be graded from Grade 1 – Excellent to Grade 5 – very poor, with Grade 3 subdivided into Grade 3a – good quality and 3b – moderate quality.

8.4 The NPPF at paragraph 170 under Section 15: Conserving and enhancing the natural environment, refers to the need to protect soils in a manner commensurate with their quality identified in the development plan and Footnote 53 to paragraph 171 states:

"Where significant development of agricultural land is demonstrated to be necessary, areas of poor quality land should be preferred to those of a higher quality".

8.5 The HBC Site Allocation and Development Plan (SADMPF) adopted 2016, at Policy 17: Diversification and Development supporting the Rural Economy, states that

"Proposals for the diversification of farm enterprises.....will be permitted provided:

(i) The site is of lower agricultural land grade (i.e. Grade 3b, 4 or 5 or non-agricultural)"

This document precedes the NPPF by 3 years.

8.6 The Applicant's agricultural land classification consultants have graded the application site as Grade 3b, i.e. moderate quality agricultural land. (This is defined by the Government as:

"land capable of producing moderate yields of a narrow range of crops, principally:

- *Cereals and grass*
- *Lower yields of a wide range of crops*
- *High yields of grass which can be grazed or harvested over most of the year."*)

8.7 The Applicant's consultants note that:

"the land classified as Subgrade 3b is limited entirely by soil wetness" and that:

"agricultural land at the site could be graded as high as Grade1, in the absence of any other limiting factor".

- 8.8 **The amount of high-grade agricultural land in the Borough.** Based on the Natural England Agricultural Land Classification Maps, Hertsmere Borough has very little Grade 1 and 2 (excellent/good) land, the bulk being either Grade 3 or 4 (moderate/poor) land. Consequently, where most of the agricultural land is not of a high grade, even land in 3b can be considered to be of moderate sensitivity i.e. a valuable resource. Conversely, in areas where high grade land is not uncommon, Grade 3b land could be considered to be of low sensitivity.
- 8.9 **The capacity of the site to accommodate grazing sheep.** The Applicant acknowledges that the site has the potential for low intensity sheep farming. The Building Research Establishment (BRE) document 'Agriculture Good Practice Guidance for Solar Farms 2014' provides a guide of between 4 and 8 sheep per hectare and noted that this was similar to stocking rates on conventional grassland. This provides notional capacity of some 1000 animals.
- 8.10 **Continued input into the rural economy from the solar farm.** Putting aside any financial contribution to the farmer from the solar array and the grazing of a flock of some 1,000 sheep, the Applicant notes that the site will generate 2 maintenance visits per month.
- 8.11 **Analysis of Issue 3.** Considering the proposal in the light of paragraphs 8.1 to 8.10 above, I consider that the following can be seen:
- 8.12 **The proposals would reduce the ability of the site to grow crops.** The scheme would take out of production 130ha of arable land and potentially use it to graze sheep. Over such a large site this would appear to be arable/crop displacement rather than farm diversification.
- 8.13 Whilst the applicant proposes the grazing of sheep on the land once the scheme is implemented, the phrase 'potential' is used, i.e. there is no guarantee.
- 8.14 The applicant makes much of the fact that the land is Grade 3b and so not of the best and most versatile quality. However, as noted above, even Grade 3b land is of moderate quality and capable of providing moderate yields of cereals and high yields of grass. As much of the agricultural land in the Borough is of Grade 3 quality, its agricultural value should not be dismissed on this basis alone.
- 8.15 **Following installation of the solar array it will provide negligible benefits to the wider rural economy.** Putting aside the payment to the landowner and the income from the potential to graze sheep, the Applicant states that the solar farm would be visited no more than twice a month for routine maintenance. Even assuming these visitors buy food/fuel in the locality, the continuing financial benefit to the rural economy would be negligible from this very low level of activity.
- 8.16 **The soil health of the land could be improved by other methods.** The applicant maintains that on agriculture recommencing once the array etc. is removed, the soil health and soil organic carbon would have been improved through land use change from arable to grassland. However, soil health could be improved without the intervening development of the site as a solar farm.

1.0 INTRODUCTION

1.1.0 Background

1.1.1 This report relates to a proposed solar farm at Hilfield Farm, Radlett. In part using documentation submitted by the Applicant, the report describes the site and proposals, sets out the primary national and local planning policies, examines the planning issues and then sets out conclusions with a recommendation.

1.3.0 Summary

1.3.1 In summary the report concludes that the proposal would cause harm to the openness and purposes of the Green Belt, which defined harm, in carrying out the required balancing exercise is not outweighed by other considerations. Consequently, very special circumstances do not exist and the application should be refused planning permission. In addition harm will be caused to users of the footpaths that cross the site. These constitute sound and clear cut reasons to refuse planning permission.

3.0 RELEVANT PLANNING HISTORY

- 3.1 **Central Government Policy.** The main plank of Government planning policy is the National Planning Policy Framework February 2019 (NPPF). Of particular relevance to the proposals are Section 13: Protecting Green Belt land and Section 14: Meeting the challenge of climate change, flooding and coastal change.
- 3.2 **The Development Plan.** This comprises the Hertsmere Core Strategy 2013, with Policy SF1 – Creating sustainable development, and Policy CS13 – The Green Belt, of particular relevance to the proposals.

4.0 THE PROPOSALS

- 4.1 The application seeks to provide a solar array together with associated battery storage containers, a substation and an inverter/transformer station over a site area of some 130 hectares split into two parcels.
- 4.2 **Temporary Development.** Whilst the description of the development makes no reference to the development being temporary, the supporting documentation refers to a 35 year 'operational phase', following which the development would be removed and the land restored to agriculture.
- 4.3 **Rational for the siting.** The application site was chosen due to its proximity to the National Grid Elstree Substation, which "*avoids considerable delay in receiving both the connection with the Distribution Network Operator (and) land (ownership).*"
- 4.4 **Dual Use.** The proposal would provide "*...the potential for low intensity sheep grazing.*"
- 4.5 **Built Development.** In addition to the 3m high, 31m wide, solar arrays, there would be some 3,000 cubic metres of built development in the form of 36 shipping containers. Of these, 16 would be located throughout the site, with the balance of 20 in a storage area rear of the Elstree National Grid Substation.
- 4.6 Further floorspace would comprise a substation of 289cu.m., 4.2m high and a control room of 94cu.m, 3.9m high. This provides a total of some 3,400cu.m.
- 4.7 **Fencing.** The site and those public rights of way (PROW) that run through the site would be enclosed by 2.1m high, welded mesh fencing on timber posts. A buffer offset/stand off of at least 5m either side of a PROW would be provided.
- 4.8 **Biodiversity Gain.** As part of the proposals there would be over 7.5ha of grassland and flower planting; 6.7ha of low intervention skylark habitat; 2ha of parkland; two nature areas; and 2.4km of green corridor. The applicant estimates an increase in habitat biodiversity of 40% and in hedgerow biodiversity of 23%.
- 4.9 **New Permissive Path.** 578m of permissive path would be provided linking to the Hertfordshire Way and providing an alternative route around Belstone Football Club's pitches.
- 4.10 **Construction Access.** This would be from the M1 Junction 5 and the A41, and so onto the road network of Aldenham Road, Butterfly Lane, Dagger Lane and Sandy Lane.
- 4.11 **Maintenance.** Once operational, there would typically be two maintenance visits per month in a small van or car.
- 4.12 **Carbon Reduction.** The proposal would provide some 50MW of power each year of generation to the National Grid, the equivalent of the annual electrical needs of some 15,600 family homes, and representing an emission saving equivalent to a reduction of 8,100 cars

6.0 Issue 1. Would the proposals have an undue impact on the character of the landscape in the area?

6.1 The application site comprises 130ha of open agricultural land located between Watford, Borehamwood and Radlett. Whilst there is some urban influence, given this location and proximity to London, the site remains open. By proposing its development for a solar park, there must be some impact on the wider landscape. Impact from within the site on the users of the PROW that cross the site is dealt with in Issue 2 below.

6.2 **The Applicant's case.** The character of the application site is described by the Applicant as *"...semi-rural in character with some localised intrusion of man-made features."* In respect of this degree of urban intrusion reference is made to the HBC Green Belt Assessment 2017 wherein the wider Parcels of land containing the application site were estimated to be *"approximately 7% and 3% respectively covered by 'built form'"*.

6.3 Against this backdrop the Applicant's landscape consultants used and an industry standard tool, a landscape visual impact assessment (LVIA) to analyse the visual impact of the proposals on the character of the landscape, noting there were no landscape designations that could be affected by the proposal.

6.4 In respect of receptors, i.e. viewers of the proposal from a maximum of 2km outside the site, the consultants noted that the arrays had been set back from these receptors and would be screened by existing and proposed vegetation.

6.5 In terms of the magnitude of effect, this was assessed against a range of impacts set out in the LVIA as follows:

- Large - total or major alteration of views
- Medium - partial alteration to key elements
- Small - minor alteration to key elements
- Negligible – very minor alteration to key elements

It was concluded that, in the medium term, i.e. 2 - 10 years, for views from the following locations the magnitude of change would be:

7.0 Issue No 2: Would the proposal have an undue impact on users of the Public Right of Way that crosses the site?

7.1 The Applicant's Case. The existing network of Public Rights of Way (PROW) that cross the application site would be retained, with an additional 578m of new permissive paths. The PROW would be contained within 2.1m high, welded mesh fencing on timber posts. A buffer offset/stand-off of at least 5m either side of a PROW would be provided.

7.2 The Landscape and Visual Impact Assessment (LVIA), in respect of eight viewpoints from PROW within the site, notes at Table 2: Viewpoint Scale of Effect and the supporting text, that there would be:

- Large Adverse Effects in the Medium Term (2-10 years), and
- Medium Adverse Effects, Large/Medium Adverse and Large Adverse Effects in the Long Term/Semi-Permanent (10-25 years at least)

to all but Footpath Aldenham 40, where the Long Term/Semi-Permanent effect would be Small Adverse. These values reflect the fact that:

“Given these routes are within the Site, the recreational experience from these would change substantially, with undeveloped agricultural fields replaced by built development.”

A high magnitude of change is anticipated resulting in Major – Moderate and Adverse effects.

7.3 The sensitivity of PROWs. Given the location of the site close to the urban settlements of Watford, Radlett and Borehamwood, these PROW can be expected to offer a valuable recreational asset to their populations, which I consider increases their sensitivity to adverse effects.

7.4 Analysis of Issue 2. The Applicant's very fairly accept that for users of the PROW which run through the application site there would be a Large Adverse visual effect in the medium term, 2 – 10 years, and for Footpath Aldenham 40, Medium, Large/Medium and Large Adverse visual effect thereafter. This adverse visual impact arises from the change in views from *‘undeveloped agricultural fields being replaced by built development’*, the PROW running between 2.1m high fencing set 5m back from the footpath. Even when landscaped, this channelisation would reduce the recreational value of these routes. This is particularly pertinent given the proximity of the site to neighbouring towns and villages, whose residents no doubt value this network of footpaths.

7.5 Furthermore, the result of fencing the footpaths would not be limited to a visual impact. High fencing can give a perception of being contained, which is not conducive to the enjoyment of the open countryside. Also, with no ‘escape’ route available, this can be daunting for lone walkers, making the use of the footpath a potentially uncomfortable and unpleasant experience, one to be hurried. This could possibly lead to an alternative route

8.17 Consequently I consider only limited weight can be given to farm diversification as a rationale for allowing the solar farm to proceed.

9.0 Issue 4. As inappropriate development in the Metropolitan Green belt, are there other considerations which outweigh the defined harm and any other harm?

9.1 The starting point to consider any scheme within the Green Belt is: Does the proposal fall within the defined number of developments considered to be 'not inappropriate' or is it considered to be inappropriate? If considered to be not inappropriate there is no need to carry out a Green Belt balancing exercise or consider very special circumstances (VSC). However, in this case the Applicant has accepted that the proposal is inappropriate development and so the following must be considered:

1. The effects on the openness and Green Belt function of the land.
2. Would there be any other harm i.e. non-Green Belt factors, for example character and appearance, that weigh against the development?
3. Are there any 'other considerations' which would weigh in favour of it?
4. If 'other considerations' exist, do they clearly outweigh the harm to the Green Belt, and any other harm? This is the balancing exercise.
5. If 'other considerations' outweigh the harm, do VSC exist?

9.2 **Very special circumstances.** VSC do not need to be unique but exist where potential harm to the Green Belt by reason of inappropriateness and any other harm resulting from the proposals are clearly outweighed by other considerations. (Paragraph 144 of the NPPF).

9.3 **Green Belt openness.** This is the most important attribute of a Green Belt, keeping land permanently open. The openness of a Green Belt has a spatial as well as a visual aspect. Consequently, the absence of visual intrusion does not in itself mean there is no impact on the Green Belt. Whilst development not involving the construction of new buildings may not impact on the spatial aspect of the Green Belt, it could well have an adverse visual impact. This impact could also relate to the purpose of a building. There is a need therefore to separate out an assessment of any effects on openness from any assessment of effects on character and appearance.

9.4 The National Planning Policy Guidance (PPG), which supplements the NPPF, states that in making an assessment on openness, one factor to be taken into account is "*the duration of the development and its remediability...*". Consequently, whilst inappropriate development would still cause substantial harm to the Green Belt, the degree of any other harm could potentially be reduced if the proposal were temporary.

9.5 **The purposes of the Green Belt.** It serves 5 purposes:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding countryside encroachment;

4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

9.6 **The Applicant's case.** Having accepted that the proposals are defined as inappropriate development, the applicant promotes the development on the basis that very special circumstances (VSC) are present which outweigh the defined harm and any other harm. That part of the NPPF relating to Green Belt, at paragraph 147, states that:

"... very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources".

9.7 In respect of openness, the applicant prays in aid that the development is not intended to be permanent and would be reversible, with a *"... lifetime of 35 operational years."*

9.8 In respect of any visual impact, the applicant considers the site to be visually well contained by existing vegetation and this will be strengthened as part of the proposals.

9.9 VSC are put forward by the applicant as follows:

1. Increasing renewable energy generation.
2. Climate emergency.
3. Energy security.
4. Best available technology.
5. Good design.
6. The lack of alternative sites.
7. Temporary and reversible impacts.
8. Biodiversity net gain.
9. Soil regeneration.
10. Green infrastructure.
11. Farm diversification.
12. Transmission/distribution connection.

- 9.10 **An analysis of Issue 4.** Given that the Applicant has very fairly accepted that its proposal is by definition inappropriate development, then the harm to the Green Belt must be substantial and carries great weight in the balancing exercise.
- 9.11 **What is the impact of the proposal on openness?** The site of 130ha, of open agricultural land, would become a solar farm with rows of arrays 3m high, located 3m to 4.5m apart, 36 containers each 2.9m high, two other buildings at 4.2m high and measuring 3,300cu.m. in total, located in 17 locations across the site. This degree of development, combined with the 2.1m high security fence, must have a substantial impact on, and cause significant harm to openness by reason of its spatial aspect and the industrial nature of the proposed buildings. Consequently, the land would not be kept permanently open. This degree of harm must carry significant weight.
- 9.12 **What is the impact of the proposal on the purposes of the Green Belt?** The Applicant's Planning Statement refers to the HBC Green Belt Assessment 2017 and Parcels 9 and 19 within which the application site falls.
- 9.13 In respect of Parcel 9, the westernmost parcel adjoining the M1, it provides a score of 3 out of 5 for Purpose 2: to prevent neighbouring towns from merging and Purpose 3: to assist in safeguarding the countryside from encroachment.
- 9.14 In respect of Parcel 19, the easternmost parcel abutting the southern edge of Radlett and adjoining Watling Street, it has a 3 out of 5 score for Purpose 2 and 5 out of 5 for Purpose 3.
- 9.15 I consider these relatively high scores are indicative of the substantial harm the proposed development would cause to these two purposes, which should carry significant weight in carrying out the balancing exercise.
- 9.16 **Is there any non-Green Belt harm?** I have dealt with the visual impact of the proposal on the character of the landscape in the area and users of the PROW that cross the site under Issues 1 and 2 above. I have shown that there is limited harm to the wider landscape but that there is significant harm to users of the PROW.
- 9.17 **Are there other considerations which might weigh in favour?** The applicant has put forward a number of other considerations which it says weigh in favour of the proposal. I will take each in turn below:
- 9.18 **Increased renewable energy/climate emergency/energy security.** Great emphasis is placed upon the amount of renewable electricity generated in Hertsmere, increasing as a result of the proposal from 5.4% to 20%, so approaching the national average of 40%. However, and given that most renewable electricity generation is wind driven, there is nothing in Government policy that requires Local Planning Authorities to be self-supporting in energy production. Consequently, I consider very little weight can be placed on this consideration.

- 9.19 **Best available technology/good design.** I cannot comment on the proposed technology but this still relies on 3,300cu.m. of buildings and arrays of solar panels. Consequently, I consider that carries very little weight.
- 9.20 **The lack of alternative sites.** The search was driven by the need to be within a 5km radius of the Elstree substation. Consequently, all of the area of search is either built-up or within the Metropolitan Green Belt. Given the narrow area of search based only on one substation, rather than a UK-wide search, I consider little weight can be given to this factor.
- 9.21 **Temporary and reversible impacts.** The relevant PPG recognises that the duration of a development and its remediability is a factor to be taken into account. In this case the Applicant considers the proposal is reversible and has a “...*lifetime of 35 operational years*”. I note the PPG referred to by the Applicant in support of this ‘temporary’ use does not specify what ‘temporary’ amounts to.
- 9.22 In addition the Applicant uses the phrase ‘*operational*’ years (my emphasis). This could imply that, should electricity generation policies and prices vary over that period and the array is off-line for periods of time i.e. non-operational, then the 35 years would be a minimum period. In any event I consider that 35 years cannot be considered to be temporary.
- 9.23 Consequently, I consider little weight can be given to the temporary nature of the proposal, the harm arising from it being on site for a minimum of 35 years would be substantial.
- 9.24 **Biodiversity net gain/ soil regeneration/green infrastructure.** The proposals would provide biodiversity net gain over the existing use of the site as intensive arable. However, some of these gains, and soil regeneration, could be achieved by alternative farming practices, which may be driven by post-Brexit farm subsidy schemes or other measures. Therefore, I consider that only moderate weight can be attached to this factor; not all of the proposed development would be required in order to provide the total benefits.
- 9.25 **Farm diversification.** I have dealt with this under Issue 3 above, where I show that only very limited weight can be given to this factor.
- 9.26 **Transmission/distribution costs.** As is made clear by the applicant, the application site has been identified due to the desire to locate close to a National Grid connection and just as importantly, to secure the land. In that other land outside the Green Belt, potentially previously developed land (PDL), may be available means that very limited weight can be given to this factor. Indeed, I note from the BRE document Agricultural Good Practice Guidance for Solar Farms, that Wymeswold Solar Farm, Leicestershire estimated to power 8,500 homes, which at 2014 was the UK’s largest connected solar farm, was built on a disused airfield and received no objections during the planning process.
- 6.27 **Carrying out the Green Belt balancing exercise.** I have shown above and in Issues 1, 2 and 3 that the proposal will cause significant harm to the openness of the Green Belt, Green Belt purposes and to recreational users of the Green Belt. Balanced against this, is the moderate weight given to the biodiversity/soil regeneration/green infrastructure benefits.

9.28 **Do VSC exist.** I have shown that the other considerations do not clearly outweigh the totality of the harm caused by the proposal. Very special circumstances do not exist and so the application should be refused planning permission.

10.0 CONCLUSIONS

- 10.1 This report relates to a proposal to site a solar panel with its attendant structures on a 130ha open site in the Green Belt.
- 10.2 I conclude that there would be only limited harm to the character of the landscape due to its undulating form, existing and proposed landscape screening and limited height of the solar array and other structures which are proposed.
- 10.3 I conclude that there would be substantial visual harm to users of the PROW that cross the site due to the high magnitude of change, which will have a Major-Moderate Significance to these users. I consider this Significance is increased by the number of actual and future users of the PROW in the nearby towns and villages and the 'canalisation' of the route, so reducing the vista beyond the 10m corridor and reducing interest to users, by looking through metal fences to an industrial landscape. This causes significant harm to the visual dimension of openness.
- 10.4 I conclude that the proposals would not aid long term farm diversification beyond the payment to the landowner and the potential for sheep grazing. Any other benefits thereafter to the rural economy are small as the site would be left unattended. Consequently, only limited weight can be attached to this consideration.
- 10.5 I conclude that, as accepted by the applicant, the proposal is inappropriate development and remains so, despite the opportunity for the Government to define renewable energy development as not inappropriate in the revision of the NPPF in 2019. Consequently, and by definition, the proposal would cause harm to the Green Belt, which carries significant weight.
- 10.6 I consider the harm caused to the Green Belt openness must carry significant weight. Notwithstanding the description of the site by the applicant as "*semi-suburban in character*" it is 130ha of underdeveloped, open farmland. The proposals will develop the site and by definition harm openness, the most important attributes of a Green Belt.
- 10.7 I consider the proposal, by developing open land, will harm the purposes of the Green Belt i.e. by reason of preventing neighbouring towns from merging and safeguarding the countryside from encroachment. Great weight must be placed on this factor.
- 10.8 In respect of other potential harm, I conclude limited weight can be placed on the availability of this site for renewable electricity generation. There is no evidence that other non-Green

Belt sites adjoining substations are unavailable or that each LPA must be self-contained regarding electricity generation.

- 10.9 I conclude that the undoubted benefits to biodiversity/soil health are not exclusive to the proposal and could arise by other means, such that only moderate weight can be applied.
- 10.10 I conclude that little weight can be placed on the temporary nature of the proposal given that it will have at least 35-year operational lifespan. This lifespan could potentially become longer if for any reason the array was not operational for a period of time. In any event I do not consider 35 years as temporary in respect to harm to the Green Belt.
- 10.11 In drawing these conclusions together I consider that the other considerations in this case do not clearly outweigh the harm set out above. As the very special circumstances necessary to justify the development of this Green Belt do not exist, I consider the application should be refused for the following reasons:
1. Harm to the openness and purposes of the Green Belt by reason of inappropriate development and the absence of very special circumstances to outweigh the defined harm and other harm.
 2. Harm to users of the PROW that cross the site by reason of adverse visual impact, from a restricted view to an industrial landscape and the perception of the 'channelling' of these routes, making them less valuable as a recreational resource.

Appendix 3

Heritage Statement prepared by Dr Jonathan Edis, Heritage Director, HCUK Group



Heritage Statement

Hilfield Solar Farm,
Aldenham,
Hertfordshire

Pins Ref:
APP/N1920/W/22/3295268

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1. Introduction

Background and qualifications

1.1 This Heritage Statement has been prepared by Dr Jonathan Edis, Director of HCUK Group, on behalf of Aldenham Parish Council. It forms an appendix to the evidence of Mrs Valerie Scott, Principal Planning Consultant of HCUK Group, in support of the Parish Council's case as a Rule 6(6) Party in an appeal relating to Hilfield Solar Farm, Aldenham, Hertfordshire.

1.2 Dr Jonathan Edis has forty years of continuous employment in the heritage sector, including ten years as a conservation officer (in Bedfordshire) advising local planning authorities on applications affecting heritage assets. A large number of those cases have involved renewable energy schemes of various types, including several hundred appeals.

1.3 A site visit was undertaken on 6 July 2022.

Approach to the assessment

1.4 The council's second reason for refusal of planning permission stated that the proposed solar farm would cause less than substantial harm (paragraph 202 of the National Planning Policy Framework) to five designated heritage assets, as follows:

"The proposal would cause less than substantial harm to the significance of the following neighbouring designated heritage assets by reason of its impact on their settings: Slades Farmhouse (listed building, Grade II, entry 1103614), Hilfield Castle (listed building, Grade II star, entry 1103569), Hilfield Castle Lodge (listed building, Grade II, entry 1103570), Aldenham House Registered Park and Garden (Grade II, entry 1000902) and Penne's Place (Scheduled Monument entry 1013001). The public benefits of the development would not be sufficient to outweigh the less than substantial harm that would be caused to the significance of those designated heritage assets, and therefore the proposal is considered unacceptable, pursuant to Policy CS14 (Protection or Enhancement of Heritage Assets) of the Hertsmere Local Plan (Core Strategy) 2013 and pursuant to paragraph 202 of the National Planning Policy Framework 2021."

- 1.5** It was accepted in the Appellant’s Statement of Case (Pegasus Group, March 2022, paragraph 9.12) that the proposal would cause less than substantial harm to the significance of three listed buildings, namely Hilfield Castle (listed grade II*), Hilfield Castle Lodge (grade II), and Slade’s Farmhouse.¹ Since this is, in effect, a generally agreed and accepted position, the approach taken in the following assessment is to concentrate on these buildings, since the Inspector is inevitably going to have to form a judgment on the planning balance within paragraph 202 of the NPPF.
- 1.6** That is not to say that there is no effect on the other c.40 designated heritage assets in the vicinity of the application site. There will be some effect, whether visual or abstract, on the setting of several of these assets. These effects will have to be considered by the Inspector individually (where they are raised by one or more parties to the appeal) and in totality. The present assessment proceeds on the basis that the effects on the Hilfield Castle Group, and on Slade’s Farmhouse, are the main heritage issues, albeit there is a need to give consideration to all the assets concerned.
- 1.7** There are several parties to this appeal, and several consultees have given opinions on the effect of the proposal on heritage matters, including Place Services (on behalf of the council), and Historic England. The assessment in the present Statement stands on its own merits, and does not seek to respond to, or engage with, any of the other third party assessments that have been made.
- 1.8** As a general introductory observation, the Inspector’s attention is drawn to Figure 14, which shows the spatial relationship between the two main parts of the proposed solar farm and the main heritage assets addressed in this Statement. From a heritage perspective, the solar farm has, unfortunately, attracted itself to some of the most significant assets in the area, giving rise to an unfortunate and uncomfortable relationship with the historic environment.

¹ The listed buildings at Hilfield Castle are referred to as the Hilfield Castle Group, for convenience.

2. Relevant Planning Policy Framework

2.1 The decision maker is required by section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 to have special regard to the desirability of preserving a listed building and its setting when exercising planning functions. The decision maker must give considerable importance and weight to the desirability of preserving the significance of the listed building, and there is a strong presumption against the grant of permission for development that would harm its heritage significance.²

2.2 Although there are no statutory provisions for the consideration of effects on the setting of other types of designated heritage asset, such as registered parks and gardens, and scheduled monuments, it is clear that a high priority needs to be given to these matters, as is discussed further below.

2.3 For the purposes of this assessment, preservation equates to an absence of harm.³ Harm is defined in paragraph 84 of Historic England's Conservation Principles as change which erodes the significance of a heritage asset.⁴

2.4 The significance of a heritage asset is defined in the National Planning Policy Framework (NPPF) as being made up of four main constituents: architectural interest, historical interest, archaeological interest and artistic interest. The assessments of heritage significance and impact are normally made with primary reference to the four main elements of significance identified in the NPPF.

2.5 The setting of a heritage asset can contribute to its significance. Setting is defined in the NPPF as follows:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."

² Barnwell Manor Wind Energy Limited v East Northamptonshire District Council and others [2014] EWCA Civ 137.

³ South Lakeland v SSE [1992] 2 AC 141.

⁴ Conservation Principles, 2008, paragraph 84.

- 2.6** Historic England has published guidance on development affecting the setting of heritage assets in *The Setting of Heritage Assets* (second edition, December 2017), better known as GPA3. The guidance proposes a stepped approach to assessment in which Step 1 involves the identification of the relevant heritage assets, Step 2 establishes their significance, and Step 3 describes how the change within the setting of the assets might affect their significance. In cases where there is a resultant loss in significance, amounting to harm, Step 4 is engaged, requiring the discussion of mitigation.
- 2.7** The NPPF requires the impact on the significance of a designated heritage asset⁵ to be considered in terms of either “substantial harm” or “less than substantial harm” as described within paragraphs 201 and 202 of that document. National Planning Practice Guidance (NPPG) makes it clear that substantial harm is a high test, and case law describes substantial harm in terms of an effect that would vitiate or drain away much of the significance of a heritage asset.⁶ The Scale of Harm is tabulated at Appendix 1.⁷
- 2.8** Paragraphs 201 and 202 of the NPPF refer to two different balancing exercises in which harm to significance, if any, is to be balanced with public benefit. Paragraph 18a-020-20190723 of National Planning Practice Guidance (NPPG) online makes it clear that some heritage-specific benefits can be public benefits. Paragraph 18a-018-20190723 of the same NPPG makes it clear that it is important to be explicit about the category of harm (that is, whether paragraph 201 or 202 of the NPPF applies, if at all), and the extent of harm, when dealing with decisions affecting designated heritage assets, as follows:
- “Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated.”*
- 2.9** Paragraph 199 of the NPPF states that great weight should be given to the conservation of a designated heritage asset when considering applications that

⁵ The seven categories of designated heritage assets are World Heritage Sites, Scheduled Monuments, Listed Buildings, Protected Wreck Sites, Registered Park and Gardens, Registered Battlefield and Conservation Areas, designated under the relevant legislation.

⁶ Bedford Borough Council v SSCLG and Nuon UK Limited [2013] EWHC 4344 (Admin).

⁷ The Scale of Harm in Appendix 1 has been used as a guide by HCUK Group since 2019, with little or no comment from decision makers or consultees. It intended to assist in calibration. It is not a prescriptive methodology.

affect its significance, irrespective of how substantial or otherwise that harm might be.

2.10 Paragraph 203 of the NPPF refers to the approach to be taken towards non-designated heritage assets as follows:

"The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset."

2.11 Paragraph 203 of the NPPF has not been pursued further in this Statement, since the heritage issues are concentrated in paragraph 202 of the NPPF, relating to designated heritage assets.

2.12 The council's first reason for refusal of planning permission states that the proposal is contrary to Policy CS14 (Protection or Enhancement of Heritage Assets) of the Hertsmere Local Plan (Core Strategy) 2013.

3. Statement of Significance

Introduction

3.1 This chapter of the Statement establishes the significance of the relevant heritage assets in the terms set out in the NPPF, and it comments on the contribution of setting to significance. The identification of the heritage assets equates in part to Step 1 of GPA3, and the assessment of significance equates to Step 2 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 4 (Heritage Impact Assessment) and with the tabular methodology at Appendix 2.

The Hilfield Castle Group

3.2 Listed grade II* on 1 June 1984, Hilfield Castle is officially described as follows:

"Large house. Circa 1798-99 by Jeffry Wyatt for G.Villiers. Rendered brick. Slate roofs. Picturesque Gothick. Symmetrical villa with attached conservatory. 4-storey central tower flanked by octagonal turrets to lower 4-storey bays with outer 2-storey bays with a later mansard attic. Basement throughout. 5 windows. Central porte cochère has 3 Tudor arches, diagonal buttresses and crenellated parapet. Blocked ground floor window to right has 3 lights with cusped heads, rectangular bay with mullioned windows to left, other windows with hood moulds. Turrets have slit windows, machicolated and crenellated. Timber canted bay window with glazing bars and pierced parapet over porte cochère. Casements with 2-centred heads on upper floors. Crenellated parapet. Octagonal corner turrets with offsets, slit windows, machicolations and crenellations. Many octagonal - shafted chimneys. Left return: ground floor, canted timber bay. Garden front in similar style: canted ground floor verandah with Tudor arches and crenellated parapet flanked by large 3-light windows. Canted centre to tower has square headed sashes on first floor and casements with 2-centred heads above. Corner turrets. Single storey 4-bay buttressed range to left of garden front has 3-light windows with intersecting tracery to 'chapel' with 4-light window and crocketed finials to diagonal buttresses, crenellated turret on ridge. 1 bay beyond with an oriel window. Interior: vaulted entrance hall, octagonal breakfast room, repositioned C17 panelling, stained glass,

ornamental bosses to ribbed vault in conservatory. A low crenellated wall with octagonal piers extends to far right from entrance front. The house was built as Hillfield Lodge replacing Slys Castle. The garden (south) front differs only in minor details from the extant elevation drawings representing one of Wyatt's earliest known designs. (D.Linstrum, Sir Jeffry Wyattville, architect to the King, Oxford, Clarendon Press, 1972)."

3.3 Historic England's website states that grade II* listed buildings (such as Hilfield Castle) are "particularly important buildings of more than special interest".⁸

3.4 Originally known as Hill Field Lodge, Hilfield Castle (Figures 1 to 9) was built by architect Jeffry Wyatt (1766-1840) for the Hon. George Villiers, brother of the Earl of Clarendon. It was sold in 1818 to John Fam Timins, who had retired from a profitable military career in the British East India Company Timins died in 1843, but the house remained in the family until 1906, when it was sold to Lord Aldenham.

3.5 There are two other grade II listed buildings closely associated with Hilfield Castle, one of which is the Lodge (listed 1 June 1984), also by Wyatt, 1798-1799, and the other of which is the Gatehouse (listed 1 June 1984), again by Wyatt, 1798-1799, containing a water engine for the castle.⁹

3.6 Taken together, the three listed buildings that form the Hilfield Castle Group are of considerable heritage significance. They were located in a commanding position, within an estate that extended some 750m north-westward to a point near the edge of what is now the Elstree National Grid 400KV substation (Figures 2 to 7). The estate has been broken up, and the parkland and the setting of Hilfield Castle have been affected by a number of other 20th century interventions, notably Elstree Aerodrome (1940s), Elstree Reservoir (c.1953), and development at Hilfield Farm. These developments have put pressure on the quality of the setting of Hilfield Castle, which originally had a Front Lawn extending eastwards onto land now occupied by part of the runway and reservoir, and a Western Lawn on the west side of Hilfield Lane. Part of the setting of the listed building still contributes to the

⁸ <https://historicengland.org.uk/advice/hpg/has/listed-buildings/>

⁹ The Gatehouse is not cited as being an issue in the council's first reason for refusal of planning permission, but it is clearly part of the group.

significance of the Hilfield Castle Group, but it has been greatly compressed in the past 80 years.¹⁰

Slade's Farmhouse

3.7 Listed grade II on 12 August 1985, Slade's Farmhouse is officially described as follows:

"House. Late C18, altered and extended in C19. Brick, pebbledashed. Half hipped tiled gambrel roof. 2 storeys and attic. 3 windows. Central entrance. Glazing bar sashes. Coved hoods over ground floor openings. 3 dormers. Ridge stack just off centre. Lean-to and further extensions to rear. Interior not inspected."

3.8 The main elevation of the farmhouse faces south-west (Figure 13). It originally fronted directly onto Sawyer's Lane, a track now lost and unused, that was severed and supplanted by the creation of Butterfly Lane c.1889 (Figures 10 and 11).¹¹ Sawyer's Lane ran on a NW-SE alignment through agricultural fields used for grazing, and to the south-east it formed a T-junction with the old course of Grubbs Lane that has long since been absorbed into Aldenham House RPG and its internal woodlands. The remodelling of the north-western part of the park, and the formation of Butterfly Lane (originally known as New Grubb's Lane) c.1889 clearly resulted in noticeable change within the surroundings of the farmhouse. The O.S. map of 1898 indicates that formal parkland landscaping and structural planting had been laid out to the south-east of New Grubb's Lane, replacing the old grassed fields described in the tithe apportionment only half a century earlier. To that extent, part of the agricultural surroundings of Slade's Farmhouse had been emparked.

3.9 In recent decades various buildings have been erected to the north-east of Slade's Farmhouse, including hardstandings (figure 12). These buildings have affected the

¹⁰ There is no physical boundary to the setting, although the quality and state of preservation of the setting is now variable. Some aspects of the setting (e.g. views as far as the horizon, and views over the former estate, the original extent of which is shown in Figure 4), may be of particular importance.

¹¹ The road diversion forming Grubb's Lane (amongst other changes to roads in Aldenham) was discussed at a ratepayer's meeting reported in the Herts Advertiser, 5 November 1889. Aldenham Road was realigned around the same time.

setting of the listed building, further removing it from the medieval and post-medieval field system that once surrounded it.¹²

3.10 In terms of its connection with its agricultural origins, the setting of the listed building is now best appreciated from the south-west, and from the north.

3.11 Internal access to Slade's Farmhouse has not been obtained, and the building was observed from the public footpath. It is here accepted that it is a building of special architectural and historic interest, and that its remaining agricultural surroundings are the most significant part of its setting.

Aldenham Park

3.12 Aldenham Park was designated on 11 June 1987, and the list description appears in full in Appendix 3. The north-western part of the RPG, including the scheduled monument known as Penne's Place, is now defined by Butterfly Lane (Figure 11). As has already been described above, this northern area was emparked c.1889, and absorbed a medieval and post-medieval system of grassed fields into a more formally designed landscape. Insofar as this "captured" area now has heritage significance, it relates to the intrinsic interest of the RPG, to the south-east of Butterfly Lane.

3.13 The setting of the RPG, to the north-west of Butterfly Lane, including Slade's Farm, has not been modified for the enjoyment of views inward or outward (to and from) from the park. It is not a "borrowed landscape". It is different in character from the RPG, and is, in effect, the part of the surroundings "left-over" after the creation of Butterfly Lane and the emparkment of c.1889. The evidence of the tithe map and apportionment would suggest that much of the land here was, in fact, used for grazing until the mid-19th century, and that Butterfly Lane divided it into two different landscapes or character areas, from a heritage perspective.

3.14 Given that the official list description of the RPG makes a clear historical distinction between the northern and southern parts of the park (the northern part being north of the old line of Grubb's Lane, in the vicinity of Penne's Place), it would seem that

¹² The setting has no physical boundary, as such. It includes the original agricultural surroundings, together with the modern development to the north east, and Butterfly Lane, and (at least conceptually) the north-western fringe of the RPG. It is now of variable significance, the most original part being the agricultural land.

the southern part of the RPG is even more detached, historically, from the setting to the north-west of Butterfly Lane.

- 3.15** Taken as a whole, the designation is clearly of special architectural and historic interest, and it has a historical and contextual connection with the agricultural land to the north-west of Butterfly Lane. However, the setting to the north-west does not rely strongly on visual interconnections, and the extent to which the RPG draws significance from that setting is now relatively limited.

Penne's Place

- 3.16** Penne's Place was scheduled on 5 February 1991. The official description appears in Appendix 4. It ceased to be occupied some centuries ago, and is now in earthwork form, covered by trees (Figure 15). The feature seems to have been landscaped as part of Aldenham Park in the late 19th and early 20th centuries. It is clearly of considerable archaeological and historical interest, but it is not readily accessible or easily interpretable for most people.

Summary of significance

- 3.17** The Hilfield Castle Group is of particular heritage significance, set in a commanding position so as to see over the extensive lawns of a country estate. The surroundings have come under pressure in the last 80 years, notably as a result of the construction of Elstree Aerodrome and Elstree Reservoir.
- 3.18** Aldenham House RPG, which contains the scheduled monument known as Penne's Place, is also of considerable heritage significance. Slade's Farmhouse, which is to the north-west of the RPG, retains some of its agricultural setting, within a medieval and post-medieval field system, but the creation of Butterfly Lane c.1889 means that it is distinct from, and outside, the northern part of the RPG.

4. Heritage Impact Assessment

Introduction

- 4.1** This chapter of the Statement describes how the proposed development will affect the setting and significance of the heritage assets identified in the preceding chapter. It equates in part to Step 3 of GPA3. Steps 2 and 3 of GPA3 are closely connected, so this chapter should be read in conjunction with Chapter 3 (Statement of Significance) and with the tabular methodology at Appendix 2.

The proposed development

- 4.2** The proposed development consists of a solar farm with two main groups of panels, and associated infrastructure, as is more fully described in the Design and Access Statement, and the council's report, and other documents.
- 4.3** From a heritage perspective, solar arrays have a presence, and an extent, which change the character of the land on which they are placed. In simple terms, the change in the present case would be from agriculture to rows of structures that provide renewable energy. The form of the development is relatively passive, rather than active, which is to say that it does not bring with it the same level of activity that might be associated with a housing development. However, the change will persist for at least 35 years, and it is impossible to be sure that the agricultural character will be restored after that time. There will be a significant impact, irrespective of whether the solar farm is decommissioned in 35 years.

Effect on the Hilfield Castle Group

- 4.4** The Appellant's Statement of Case says this about the effect of the proposal on the setting of the Hilfield Castle Group:

"With regards to Hilfield Castle and Hilfield Castle Lodge, the proposals mainly lie beyond the area that was depicted as associated parkland on historic maps. A small area of former parkland, as denoted on historic maps, to the north-east of Hilfield Castle will have panels placed within it, but this area has changed through its severance from Hilfield Castle and the remainder of the grounds by a tree belt and

the grounds of the Aerodrome, and its change of intrinsic character from grassland with scattered trees to arable cultivation. The change of character to the wider surrounds of the assets, including some areas under common ownership and occupation, will cause only less than substantial harm at the low end of the spectrum to Hilfield Castle and Hilfield Castle Lodge.”

4.5 Examination of the tithe map and apportionment confirms that the estate associated with Hilfield Castle extended a considerable distance north-westwards from the listed building, and that a large part of it was landscaped and optimised with the obvious intention of looking out in all directions over lawns, into the surrounding countryside. The proposed solar array is proposed to be placed directly over much of the north-western half of the former estate, including parts that were expressly described as “North Park”, “Front Lawn”, and “Western Lawn” (Figures 2 to 7). It should be noted that the tithe map and apportionment show parkland extending beyond the area indicated by the Ordnance Survey.

4.6 In order to arrive at an assessment of a low level of less than substantial harm to the significance of the Hilfield Castle Group, the Appellant has had to rely on (1) the area of affected parkland being “small”, (2) change through severance from Hilfield Castle by a tree belt and the grounds of the aerodrome,¹³ and (3) a “change of intrinsic character from grassland with scattered trees to arable cultivation”. The contrary view would be that (a) the affected area of the original estate is “large”, (b) the severance from Hilfield Castle involves abstract considerations, as well as visual matters, and (c) the change to a solar farm is greater than the change from grassland to arable, and the character change can certainly be described as “intrinsic” (as well as significant, and noticeable).

4.7 It has not been possible to visit Hilfield Castle as part of this assessment. The Inspector may have the opportunity to visit, and to experience views from the Hilfield Castle Group in more detail.¹⁴ Presently available views are part of the assessment of setting, but there is also a more abstract dimension in which one has to consider change over time, together with the fact that Hilfield Castle must have been sited so as to command views over extensive areas of countryside. The

¹³ The severance in the case of Hilfield Castle was not as pronounced as it was when Aldenham Park was extended c.1889, involving a new physical boundary in the form of Butterfly Lane – see Chapter 3.

¹⁴ It can reasonably be supposed that there are extensive views from the upper windows, even without the benefit of a site visit, and that the windows were placed so as to optimise the enjoyment of the surrounding countryside - a fundamental part of the building’s significance.

Inspector is asked to give particular attention to this aspect of the significance of Hilfield Castle.

- 4.8** In reality, the extent of the less than substantial harm caused by the proposed solar array is greater than suggested by the Appellant. This is partly because the size of the estate, and the designed landscape, does not seem to have been fully appreciated in the Appellant's Statement of Case. The setting of the listed building has been drawn narrowly, rather than with an appreciation that the house was sited with the intention to enjoy as much as possible of the surrounding countryside from an elevated position. The Appellant also relies too heavily on the visual effect of the "tree belt"; vegetation is not static, and will have changed significantly around Hilfield Castle over the past 220 years, and will continue to change in the future (Figure 9).
- 4.9** The real effect of the less than substantial harm to the significance of the Hilfield Castle Group, within the meaning in paragraph 202 of the NPPF, is that it will fall in the medium category of the scale in Appendix 1. It can reasonably be described as significant, noticeable, and material, and with a presence that will change another part of the surroundings of the group of assets. It would have to be regarded as serious if one were to take a long term view of the cumulative erosion of the parkland setting over the past 80 years.¹⁵
- 4.10** The Inspector's attention is drawn to the fact that Hilfield Castle is a particularly important building, which is listed grade II*, placing it in the top 5.8% of buildings nationally. While there is no suggestion that the harm to the significance of the listed building is substantial (within the meaning in paragraph 201 of the NPPF), it should be noted that paragraph 199 of the NPPF states that great weight should be given to the asset's conservation, subject to two further considerations:

¹⁵ Historic England's advice on cumulative change, expressed on page 4 of GPA3, is that it is legitimate to consider the long term position. This would seem to make the combined effect of Elstree Aerodrome, Elstree Reservoir, development at Hilfield Farm, and the Elstree National Grid 400KV substation, a material consideration: "*Where the significance of a heritage asset has been compromised in the past by unsympathetic development affecting its setting, to accord with NPPF policies consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the asset. Negative change could include severing the last link between an asset and its original setting; positive change could include the restoration of a building's original designed landscape or the removal of structures impairing key views of it (see also paragraph 40 for screening of intrusive developments).*" (With added emphasis).

1. That the more important the asset, the greater the weight should be. Clearly, greater weight should be applied in the case of a grade II* listed building.
2. The “great weight” applies even if there is less than substantial harm to the asset’s significance.

4.11 Paragraph 200 of the NPPF further reinforces the point about the importance of grade II* listed buildings, albeit in the context of substantial harm, which does not apply in this case. The underlying point, however, is that any harm to the significance of a grade II* listed building must be given great weight, particularly in circumstances where the decision maker concludes that the change within the setting might sever the last link between an asset and its original setting.

Effect on Slade’s Farmhouse

4.12 The effect of the proposal on the setting of Slade’s farmhouse will be to bring solar panels around the north and north-east sides of the listed building. On the north-east side the setting has already been affected by relatively modern development, so it is the swathe of panels around the northern side that will have the most acute effect on the remaining agricultural setting of the listed building. Although direct views towards the main south-west elevation will not be impeded, there will be a peripheral visual effect over a large part of the remaining agricultural setting.

4.13 While the emparkment of the agricultural setting to the south-east happened some 130 years ago, when Butterfly Lane (New Grubb’s Lane) sliced across Sawyer’s Lane, and while it might be said that the erosion of that agricultural setting is happening incrementally, over a long period of time, Slade’s Farmhouse is under pressure. Modern buildings and hardstandings to the north-east of the listed building have already removed the former field system on that side. Solar panels to the north will, inevitably, take away more of that setting. As a consequence, there will be less than substantial harm to the significance of the listed building, within the meaning in paragraph 202 of the NPPF. In the opinion of the author of this Statement, the harm will fall in the medium category of the scale in Appendix 1, which is to say that could reasonably be described as significant, noticeable, and

material. It would have to be regarded as serious if one were to take the long term view of the cumulative erosion of the agricultural setting over the past 130 years.¹⁶

Effect on Aldenham House RPG

4.14 Aldenham House RPG is separated from the application site by Butterfly Lane. Although some of the proposed solar panels would come close to Butterfly Lane, to the east of Slade's Farmhouse, most of them would be separated from the RPG by some distance. Given that there is quite dense tree cover in Butterfly Lane, and in the northern part of the RPG, there will be little or no material intervisibility that might give rise to harm to the significance of the RPG. A further factor to consider is that the northern part of the RPG is a relatively modern extension of the park, and the tree cover here is relatively recent, as described above, under the assessments relating to Slade's Farmhouse. There is no evidence of a "borrowed landscape" to the north-west of Butterfly Lane.

4.15 The visual effect of the proposal on the setting and significance of Aldenham House RPG will be relatively slight, and it has already been pointed out that the RPG does not derive much of its significance from the agricultural land to the north-west of Butterfly Lane. On this basis, there would be a low level of harm to the significance of the RPG, falling at the bottom of the scale in Appendix 1, and registering as less than substantial harm within the meaning in paragraph 202 of the NPPF.

Effect on Penne's Place

4.16 Penne's Place is visually contained by trees and undergrowth, within the north-western fringe of Aldenham House RPG, and it is separated from the application site by Butterfly Lane. The nearest solar panels would be some distance to the north-west of Butterfly Lane, out of sight. From the site visit, it was difficult to see how there could be any visual change within the setting of Penne's Place, such as to give rise to harm to its significance. Even the abstract change, by an extension of the largely abstract effect of the proposal on the setting of Aldenham House RPG (which

¹⁶ See footnote 15. Historic England's advice on cumulative change would seem to make the severing effect of Butterfly Lane c.1889, and the consequential loss of part of the agricultural field system around Slade's Farmhouse, a material consideration.

contains the scheduled monument) would be remote.¹⁷ On this basis, the scheduled monument would seem to be unaffected by the proposed development.

Summary of effects

- 4.17** The Hilfield Castle Group is the most affected of the heritage assets in this case. It is the highest graded (grade II*), and most architecturally and historically significant group where there will be noticeable effects. The solar farm will be placed over much of the north-western part of the former Hilfield Castle estate, and it will cover parts of the Front Lawn and Western Lawn, wrapping around the northern and western sides of group, and adding to the existing effect of Elstree Aerodrome, Elstree Reservoir, and other 20th century changes within the setting of the park. The change within the setting of the listed buildings would give rise to a medium level of less than substantial harm within the meaning in paragraph 202 of the NPPF, to which great weight must be given in the balancing exercise.
- 4.18** Slade's Farmhouse would lose another part of its agricultural setting as a result of the solar array to the north, and (beyond modern development) to the north-east. Part of the agricultural setting was lost c.1889 by the creation of Butterfly Lane, and by the consequential change in the road system here. The development would cause less than substantial harm to the significance of Slade's Farmhouse, falling to be considered within paragraph 202 of the NPPF.
- 4.19** Aldenham Park RPG does not derive much of its significance from the land to the north-west of Butterfly Lane, which includes part of the appeal site. The visual effect of the proposal on the RPG will be relatively slight. As a result, there will be a low level of less than substantial harm to the significance of the RPG.
- 4.20** Although Penne's Place was cited in the council's reasons for refusal of planning permission, the author of this Statement has been unable to observe any effects that might materially reduce its significance.
- 4.21** The harm to the significance of the heritage assets, described above, would conflict with the objectives of Policy CS14 (Protection or Enhancement of Heritage Assets) of the Hertsmere Local Plan (Core Strategy) 2013.

¹⁷ This assessment takes into account the fact that Penne's Place is in the northern part of the park, historically – that is, north of the old line of Grubb's Lane, and relatively closer to the application site than, say, Aldenham House.

4.22 In arriving at a decision, the Inspector would, in the opinion of the author of this Statement, have to take account of the fact that there would not be preservation for the purposes of the duty under section 66(1) of the Act. The effect on Hilfield Castle, listed grade II*, is the most acute issue in this respect.

4.23 Many heritage assets can absorb a degree of change within their surroundings, depending on their sensitivity, and the extent to which they can accommodate new development without suffering harm to their significance. However, there can be a tipping point at which so little of the original setting is left, that the asset in question suffers real loss. In arriving at an overall judgment on the heritage balance, the Inspector is asked to consider the pressure that has already been exerted on the settings of Hilfield Castle and Slade's Farmhouse over the last 80 to 130 years, and the extent to which their original settings have already been compressed.

5. Summary

- 5.1** The Hilfield Castle Group is of particular heritage significance, set in a commanding position to see over the extensive lawns of a country estate. The surroundings have come under pressure in the last 80 years, notably as a result of the construction of Elstree Aerodrome and Elstree Reservoir.
- 5.2** Aldenham House RPG, which contains the scheduled monument known as Penne's Place, is also of considerable heritage significance. Slade's Farmhouse, which is to the north-west of the RPG, retains some of its agricultural setting, within a medieval and post-medieval field system, but the creation of Butterfly Lane c.1889 means that it is distinct from, and outside, the northern part of the RPG.
- 5.3** The proposed development consists of a solar farm with two main groups of panels, and associated infrastructure, as is more fully described in the Design and Access Statement, and the council's report, and other documents. From a heritage perspective, solar arrays have a presence, and an extent, which change the character of the land on which they are placed. In simple terms, the change in the present case would be from agriculture to rows of structures that provide renewable energy. The form of the development is relatively passive, rather than active, which is to say that it does not bring with it the same level of activity that might be associated with a housing development. However, the change will persist for at least 35 years, and it is impossible to be sure that the agricultural character will be restored after that time.
- 5.4** The Hilfield Castle Group is the most affected of the heritage assets in this case. It is the highest graded (grade II*), and most architecturally and historically significant group where there will be noticeable effects. The solar farm will be placed over much of the north-western part of the former Hilfield Castle estate, and it will cover parts of the Front Lawn and Western Lawn, wrapping around the northern and western sides of group, and adding to the existing effect of Elstree Aerodrome, Elstree Reservoir, and other 20th century changes within the setting of the park. The change within the setting of the listed buildings would give rise to a medium level of less than substantial harm within the meaning in paragraph 202 of the NPPF, to which great weight must be given in the balancing exercise.

- 5.5** Slade's Farmhouse would lose another part of its agricultural setting as a result of the solar array to the north, and (beyond modern development) to the north-east. Part of the agricultural setting was lost c.1889 by the creation of Butterfly Lane, and by the consequential change in the road system here. The development would cause less than substantial harm to the significance of Slade's Farmhouse, falling to be considered within paragraph 202 of the NPPF.
- 5.6** Aldenham Park RPG does not derive much of its significance from the land to the north-west of Butterfly Lane, which includes part of the appeal site. The visual effect of the proposal on the RPG will be relatively slight. As a result, there will be a low level of less than substantial harm to the significance of the RPG.
- 5.7** Although Penne's Place was cited in the council's reasons for refusal of planning permission, that author of this Statement has been unable to observe any effects that might materially reduce its significance.
- 5.8** The harm to the significance of the heritage assets, described above, would conflict with the objectives of Policy CS14 (Protection or Enhancement of Heritage Assets) of the Hertsmere Local Plan (Core Strategy) 2013.
- 5.9** In arriving at a decision, the Inspector would, in the opinion of the author of this Statement, have to take account of the fact that there would not be preservation for the purposes of the duty under section 66(1) of the Act. The effect on Hilfield Castle, listed grade II*, is the most acute issue in this respect.
- 5.10** Many heritage assets can absorb a degree of change within their surroundings, depending on their sensitivity, and the extent to which they can accommodate new development without suffering harm to their significance. However, there can be a tipping point at which so little of the original setting is left, that the asset in question suffers real loss. In arriving at an overall judgment on the heritage balance, the Inspector is asked to consider the pressure that has already been exerted on the settings of Hilfield Castle and Slade's Farmhouse over the last 80 to 130 years, and the extent to which their original settings have already been compressed.

Appendix 1

Scale of Harm

Scale of Harm	
Total Loss	Total removal of the significance of the designated heritage asset.
Substantial Harm	Serious harm that would drain away or vitiate the significance of the designated heritage asset
Less than Substantial Harm	High level harm that could be serious, but not so serious as to vitiate or drain away the significance of the designated heritage asset.
	Medium level harm, not necessarily serious to the significance of the designated heritage asset, but enough to be described as significant, noticeable, or material.
	Low level harm that does not seriously affect the significance of the designated heritage asset.

HCUK, 2019

Appendix 2

GPA3 Assessment

In assessing the effect of the proposed development on the setting and significance of heritage assets, it is relevant to consider how the following factors may or may not take effect, with particular reference to the considerations in Steps 2 and 3 of GPA3. The following analysis seeks to highlight the main relevant considerations.

Relevant Considerations

<i>Proximity of the development to the asset</i>	The closest solar panels would be about 100m west of Hilfield Lodge, about 240m north of Hilfield Castle, and about 100m north of Slade’s Farmhouse.
<i>Proximity in relation to topography and watercourses</i>	There are no particular watercourses to consider for heritage purposes. The main topographical consideration is the elevated position of Hilfield Castle, intended to look out in all directions.
<i>Position of development in relation to key views</i>	While “key views” of the Hilfield Castle Group, and Slade’s Farmhouse, may not be affected, the presence of the solar array within their surroundings will be apparent.
<i>Orientation of the development</i>	The solar array does not have an orientation, as such, save for the fact that the rows of panels tend to have an east-west alignment.
<i>Prominence, dominance and conspicuousness</i>	The proposed development will be prominent and conspicuous within the surroundings of Slade’s Farmhouse, in particular.
<i>Competition with or distraction from the asset</i>	The proposed development will distract from Slade’s Farmhouse, in particular. It will also distract from views of the upper parts of Hilfield Castle, which is a reference point in the landscape when looking from the public footpath to the north.
<i>Dimensions, scale, massing, proportions</i>	It is the coverage, area and extent of the solar array, together with its relative proximity to the heritage assets, which gives rise to the change in setting.
<i>Visual permeability</i>	The apparent permeability of the array will depend on a number of factors, depending on the viewpoint that is selected. As

	described above, it is the coverage that gives rise to the change in setting.
<i>Materials and design</i>	There are unlikely to be any considerations relating to materials or design that, if changed, would alter the overall heritage assessment (other than a significant reduction in extent).
<i>Diurnal or seasonal change</i>	Seasonal change could have a bearing on the visibility of the array, particularly in winter, when looking from the Hilfield Castle Group.
<i>Change to built surroundings and spaces</i>	There will be a material change to the surroundings and spaces of the heritage assets, notably to that part of the estate and park of Hilfield Castle over which part of the array is proposed to be located.
<i>Change to skyline, silhouette</i>	There will be no changes to important skylines or silhouettes. While the upper part of Hilfield Castle can be seen from points to the north, from the public footpath (over the perimeter planting), and while it is a reference point in the landscape, the solar array will have a generalised effect, rather than a specific effect on its skyline.
<i>Change to general character</i>	The change from an agricultural character to a "solar farm" character will affect another part of the setting of Slade's Farmhouse, that has been gradually reduced in extent over the past c.130 years. There will be a similar reduction in the parkland/estate setting of Hilfield Castle. While it could be said that the parkland/estate setting has already been affected by Elstree Aerodrome, and other 20 th century influences, the change to a "solar farm" character will be alien to the original intention of uninterrupted views outward, and contrary to the idea of looking out over lawned areas intended to be in the foreground of much longer views to the horizon.

Appendix 3

List description, Aldenham House RPG

Details

The remains of a renowned late C19/early C20 arboretum and ornamental gardens, surrounded by late C18/C19 parkland, the setting for a country house.

HISTORIC DEVELOPMENT

Two country houses developed close to each other on either side of Grubb's Lane in the southern part of the manor of Aldenham during the C16 and C17, these being united under the ownership of the Coghill family in the early to mid C17. The preferred residence of the family was Penn's Place to the north of the Lane, a substantial brick house surrounded by a moat, which, having been bought by the tenant Henry Coghill in 1640, came to be known as Aldenham Hall. The Coghills had acquired the adjacent Wigbournes to the south of the Lane in the early C17, which was rebuilt c 1672 by Henry Coghill, and was generally occupied by a younger son of the family. Wigbournes came to be known as Aldenham House. The estate passed by marriage into the Hucks family in 1735. By the late C18 (estate map, 1786) Aldenham House was surrounded by formal gardens and groves, with a small landscape park laid out to the east and south, and the former Penn's Place/Aldenham Hall having largely disappeared leaving little trace except for the moat, which still remains (1999). Henry Hucks Gibbs (1819-1907, cr first Lord Aldenham 1896) moved with his family to Aldenham in 1869, developing the park and gardens with his son Vicary Gibbs (1853-1932). Henry Gibbs kept a Year Book from 1869 to 1902, detailing alterations to the gardens as well as the House and estate. The whole garden was celebrated in the early to mid C20 for its variety, extent and extreme horticultural excellence, becoming 'the period's most discussed virtuoso garden' (Elliott 1986); the arboretum was particularly renowned. Edwin Beckett and Arthur J Sweet were Vicary Gibbs' most noted gardeners. In the mid C20 Aldenham House became the centre of the Haberdashers' Aske's School, in which use it remains (1999), with considerable associated mid to late C20 building to the north and south.

DESCRIPTION

LOCATION, AREA, BOUNDARIES, LANDFORM, SETTING Aldenham House stands 3.5km south-east of Aldenham village and 2km west of Borehamwood, at the southern end of Hertfordshire. The c 140ha site is bounded to the east by the A5183 Watling Street, to the north by Butterfly (formerly New Grubb's) Lane, to the west by the road connecting Elstree with Aldenham, and to the south by agricultural land and the village of Elstree. The land slopes generally down from south-west to north-east, with a slight valley stretching in this direction across the centre of the estate, and with a stream feeding a lake, Tykes Water. The immediate setting is largely rural, with beyond this C20 settlements including Radlett, Bushey and Borehamwood, and the M1 lying only 1.2km distant.

ENTRANCES AND APPROACHES The north-west drive enters 350m north-west of Aldenham House off Butterfly Lane, between elaborate iron gates and gate piers with overthrow, flanked by stone piers supporting iron railings which lead to an outer pair of smaller piers in similar style (late C19/early C20). From here the drive runs south-east, passing the moated remains of Penn's Place to the east, 350m from the House. Some 200m north-west of the House the drive curves south, carried across a pond by a single-arch stone bridge in rustic style, passing

the remains of rock features to the east of the drive and south of the pond. The drive curves south-east, arriving at a tarmac forecourt (now, late C20, a car park) on the south-west front of the House, enclosed by a low stone kerb. A spur leads south-east off the drive 120m north-west of the House, giving access to the north-west, service front of the House. The spur crosses the stream which runs through the remains of the rock features, carried by a further single-arch stone bridge in rustic style, smaller than that carrying the main drive but in similar style. This drive was created by Henry Hucks Gibbs 1889(90, when the Aldenham to Elstree road was moved c 150m westwards to its present position, and sunk out of sight of the west front, and Grubb's Lane was removed c 200m northwards to its present position (Garden Hist 1986).

The west drive enters 250m south-west of the House, off the Elstree to Aldenham road, at Aldenham Lodge, a single-storey, early C20 lodge. The entrance is flanked by iron gates supported by brick piers with stone ball finials, in turn supporting short lengths of iron railings, with the lodge to the north and the brick park wall extending south. From here the drive curves north-east, overlooking playing fields to the north and south, to join the north-west drive 50m north-west of the House. A small, red-brick lodge stands north of the west drive, 120m north-west of the House, built around a hexagonal centre with a pyramidal roof and prominent central chimney. This marks the site of the western entrance to the estate before Gibbs moved the road westwards in 1889(90 (OS), extending the drive south-west along its present course. The west drive was, before Gibbs' works, one of two drives entering off the Aldenham to Elstree road, the second entering from the south (see below). The two joined together formed a lazy curve up to the House.

The south-east drive enters 1.2km south-east of the House, off the A5183, past a two-storey lodge standing on the north side of the entrance. From here the drive curves in serpentine fashion north-west across the park, flanked by the remains of an avenue, arriving at Tykes Water Lake lying 400m south-east of the House. The drive is carried across the narrow waist of the lake by a three-arch brick and stone bridge with a brick parapet which is ornamentally pierced. The drive continues north-west, flanked by narrow belts of trees, passing the late C20 girls' school buildings to the north, and arriving at the gateway into the pleasure grounds 100m south-west of the House. Here, iron gates are supported by tall brick piers with stone caps, flanked by curved walls with pierced brick balustrade which lead north to a brick wall (in similar style) which bounds the south side of the gardens and pleasure grounds. The drive continues north through the pleasure grounds, arriving at the south side of the forecourt on the south-west front of the House. This approach was formed by Henry Hucks Gibbs in the late C19, incorporating the northern end of the south drive which approached off the earlier course of the Aldenham to Elstree road c 150m south of the House.

The north-east drive, now (1999) disused and partly lost towards its southern end near the House, enters the park at the north-east corner, at the junction of New Grubb's Lane and the A5183. The entrance is marked by a single-storey, white-painted lodge with a stone roof, in Picturesque style, and a white-painted wooden gate and gateway. From here the drive extends c 550m south-west before its course is lost. Formerly the drive joined the north-west drive 200m from the House. This drive was created in the late C19 by Henry Hucks Gibbs (OS).

PRINCIPAL BUILDING Aldenham House (c 1672, altered C18, and probably by A Blomfield 1870-3, listed grade II*) stands towards the north-west corner of the site, surrounded by gardens and pleasure grounds and mid to late C20 buildings. It is a two-storey, red-brick building, with the entrance front to the south-west and garden fronts to the south-east and north-east, and service wings to the north-west.

GARDENS AND PLEASURE GROUNDS French windows on the north-east front of the House give

onto a raised parterre laid out with rose beds, bounded to the north by late C19 and mid to late C20 buildings, to the west by the House, and to the south by the south lawn. The rose beds are laid out in a geometric pattern, set in gravel around a small, central stone pond. The parterre is flanked by borders to the north and south, with a small raised lawn to the west, and a dwarf brick retaining wall to the east. A broad gravel path runs along the north side, with a stone seat set into it. The path, flanked by dwarf brick piers above a flight of stone steps, leads from the french windows to the east edge of the parterre, 30m east of the House. From here the path descends via a flight of stone steps, continuing east through the south side of an open lawn bounded to the south by a clipped yew hedge. This hedge forms the north boundary of the rectangular former rose garden, now laid largely to lawn with informal island shrub beds and enclosed by a yew hedge clipped into undulating forms. The gravel path arrives at a gateway flanked by brick piers supporting iron gates 90m east of the House, the entrance to the woodland garden to the east.

A cross path leads south from the east side of the rose parterre, along the west side of the yew-hedged former rose garden and the east side of the square south lawn. It turns west 75m south-east of the House, continuing along the south side of the south lawn. The south lawn is bounded to the south by a shrubbery, beyond which stands a brick retaining boundary wall with a projecting terrace on an axis with the south-east front of the House. South-east of this lies a late C20 girls' school complex.

A raised earth terrace runs along the south-east front of the House and south side of the rose parterre. A broad gravel path runs along the top of it, overlooking the south lawn. A flight of broad, shallow steps at the east end of the terrace leads down to the path separating the south lawn and the yew-hedged former rose garden. At the west end the terrace gives access to the forecourt. Here the terrace turns south along the west side of the lawn, bounded to the west by a clipped yew hedge screening the lawn from the south drive.

West of the House lies an open lawn extending west to the main road, from which it is separated by a brick retaining boundary wall, giving uninterrupted views south-west from the House and lawn to the remains of a double avenue of Turkey Oak extending 550m south-west from the road. The eastern half of the double avenue containing the mature Turkey Oaks is separated by Dagger Lane from the western half (formerly planted with elms), where the trees have all gone and the area is now pasture (1999). This avenue was created by Henry Hucks Gibbs in the late C19, and extended south-west as a double or triple elm avenue between the forecourt and the road (OS C19).

The remains of a water garden created by the Gibbs family in the late C19, embellished by areas of ornamental rockwork (possibly constructed by James Pulham & Son), runs along the course of the north-west drive. A stream emerges c 120m from the House, between the drive and the site of the former kitchen garden, meandering northwards flanked by lawns planted with specimen trees and shrubs. It runs beneath the bridge which carries the former spur of the drive east into the kitchen garden, opening out into a series of ponds across which the drive is carried by the rustic arched bridge. The stream crosses beneath the drive again c 275m from the House, emptying into a roughly rectangular pond (formerly a swimming pool?) lying adjacent to the drive and enclosed by trees, which in turn empties into the moat of the former Penn's Place adjacent to the north. East of this, a rectangular playing field bounded to the east by woodland stretches south-east from New Grubb's Lane to east of the former kitchen garden site. This forms part of Vicary Gibbs' arboretum (Lord Aldenham pers comm, April 2000). The arboretum by 1918 is said to have contained 179 varieties of oak, 500 varieties of thorn (including berberis, mahonia etc) and many other species given by Vicary Gibb's horticultural friends (Lord Aldenham pers comm, April 2000). West of the drive lies an area of overgrown woodland which contains mature specimens of ornamental tree species, and

was formerly laid out with glades running between groups of trees (OS 1898). A star-shaped pond lies within the woodland at the north-west corner. North and west of this lie playing fields, formerly open parkland planted with specimen trees (OS 1898), with a line of trees running along the road boundaries.

PARK The park lies to the east and south of the House and gardens, laid to pasture with scattered mature park trees. A major woodland block which lies east of the gardens linked the gardens with the pleasure grounds surrounding Tykes Water (OS 1898). A maple and gorse avenue formerly extended north-east from the east side of the woodland to the Watling Street boundary (Lord Aldenham pers comm, April 2000). The garden was formerly connected with Tykes Water via a straight path from the gateway standing 90m north-east of the House, which turned south-east 400m from the House into an informally arranged band of woodland meandering down to the pleasure grounds around the lake. The bridge carrying the south-east drive divides the lake into two unequal halves, each surrounded by the remains of a perimeter walk set in wooded pleasure grounds with a shrub understorey. A rustic boathouse lies at the west side of the smaller, southern half, set into the raised bank, the facade created in rockwork. Home Farm lies within the park, 450m south-east of the House. Formerly known as Stapes Farm (OS 1878), it was rebuilt as a model farm by Henry Hucks Gibbs in the late C19. The park developed from the area south and east of the House shown on the 1786 estate map, which at that date included a rectangular canal lying to the north of the present Tykes Water. The Gibbs family enlarged it considerably in the late C19, also carrying out much planting, the park being dominated by the ornamental pleasure grounds around Tykes Water.

KITCHEN GARDEN The rectangular, walled kitchen garden formerly lay immediately north of the House. It has been demolished and the area now holds mid C20 school development.

REFERENCES

Gardeners' Chronicle, (12 November 1887), pp 592-3; (21 November 1891), pp 608-9 & supplement; (7 March 1896), pp 295-7; (16 October 1897), p 266; (25 December 1909), p 429; (1 January 1910), pp 3-4; (8 January 1910), p 29; (10 September 1910), pp 196-7; (15 July 1916), p 25; (30 September 1916), pp 155-6 The Gardener's Magazine, (25 July 1896), pp 498-500; (20 June 1903), pp 403-10 J Horticulture and Cottage Gardener, (3 September 1896), pp 229-30; (3 November 1898), pp 340-1; (20 December 1900), pp 558-9; (14 March 1907), pp 230-6 & supplement Country Life, 47 (24 January 1920), pp 103-5; (23 February 1924), pp 282-90 Garden History 14, no 2 (Autumn 1986), pp 173-93 B Elliott, Victorian Gardens (1986), p 217

Maps Dury and Andrews, A topographical Map of Hartford-shire, 1766 Luke Pope, Surveys and Plans of the Estates of Robert Hucks Esq at Aldenham in the county of Hertfordshire, 1786 (D/EAm/P1), (Hertfordshire Record Office)

OS 6" to 1 mile: 1st edition published 1878 2nd edition published 1899 3rd edition published 1938 OS 25" to 1 mile: 2nd edition published 1898

Description written: April 1999 Amended: October 2000 Register Inspector: SR Edited: November 2000"

Appendix 4

Scheduling description, Penne's Place

Reasons for Designation

Around 6,000 moated sites are known in England. They consist of wide ditches, often or seasonally water-filled, partly or completely enclosing one or more islands of dry ground on which stood domestic or religious buildings. In some cases the islands were used for horticulture. The majority of moated sites served as prestigious aristocratic and seigneurial residences with the provision of a moat intended as a status symbol rather than a practical military defence. The peak period during which moated sites were built was between about 1250 and 1350 and by far the greatest concentration lies in central and eastern parts of England. However, moated sites were built throughout the medieval period, are widely scattered throughout England and exhibit a high level of diversity in their forms and sizes. They form a significant class of medieval monument and are important for the understanding of the distribution of wealth and status in the countryside. Many examples provide conditions favourable to the survival of organic remains.

Penne's Place moat is a good example of a double moated site, and has well documented connections with the Penne family dating back to the 13th century. The moat displays a diversity of features including an external bank and associated pond. As illustrated by observations in 1962-4, despite later alterations the site retains significant archaeological potential.

Details

The monument includes the remains of a Medieval moated site. The double island site consists of two rectangular enclosures. The eastern enclosure measures c.55m by 130m inclusive of the 12m wide surrounding water-filled moat. The enlarged south arm has been adapted to form a concrete-lined bathing pool in the last century. Three weirs within this moat are also later ornamental features. Within its interior is a rectangular pond measuring 55m by 8m. The remaining area is flat apart from a modern wall and pit (excluded from the scheduling). A 0.7m high external bank flanks the eastern arm of the moat. The second enclosure, immediately to the west originally measured c.60m by 105m. Only the north arm currently survives as an earthwork feature, crossed by a modern causeway. The remaining west and south arms have been infilled in the past. The flat interior is interpreted as the site of Penne's Place manor house. The surface make-up of the road crossing the area is excluded from the scheduling although ground beneath is included.

MAP EXTRACT The site of the monument is shown on the attached map extract. It includes a 2 metre boundary around the archaeological features, considered to be essential for the monument's support and preservation.



Figure 1 – Hilfield Castle c.1890.

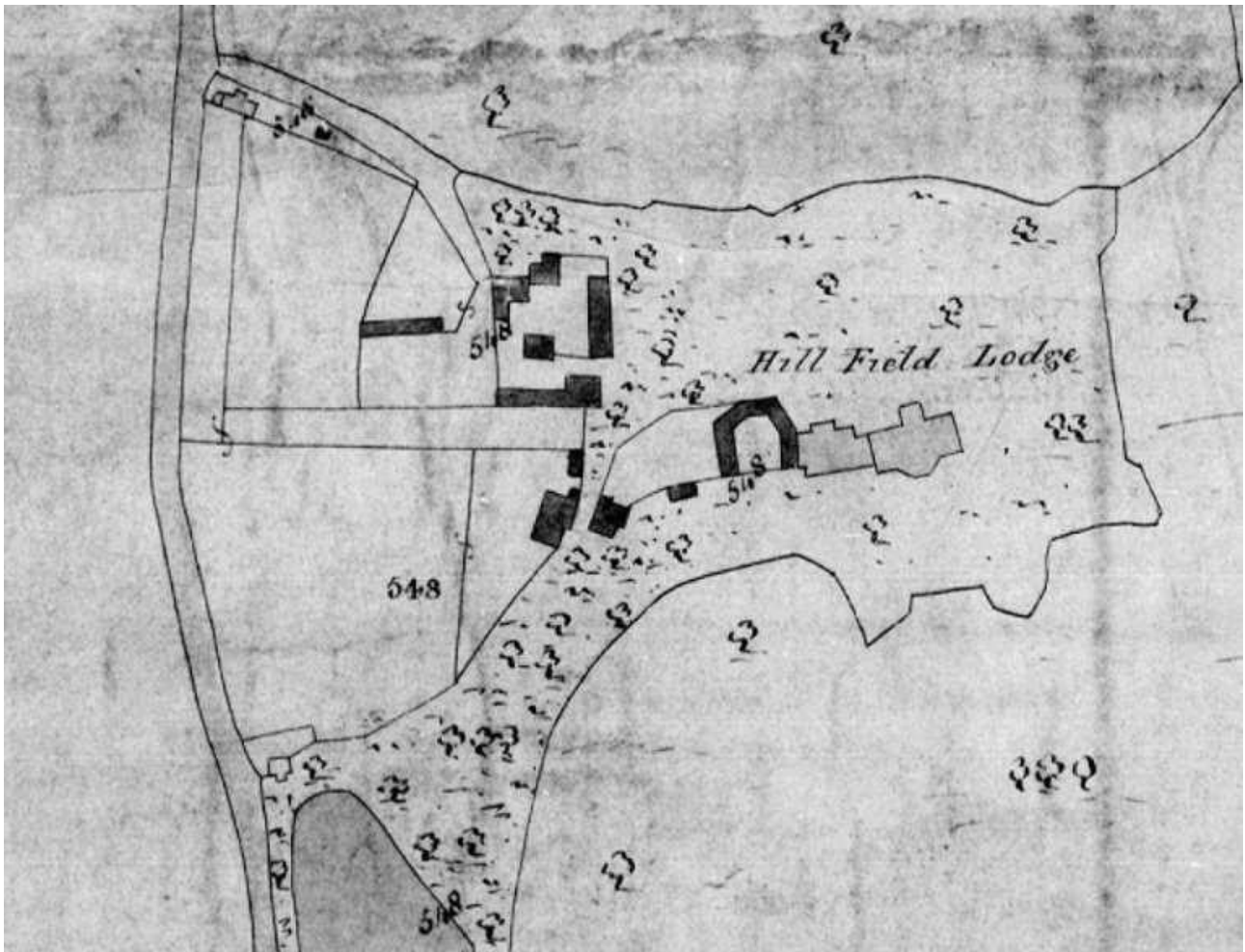


Figure 2 – Extract from the tithe map of Aldenham, dated 1839 (north is not exactly at the top) showing Hilfield Castle, then known as Hill Field Lodge. The listed buildings forming the Hilfield Castle Group are identified on the extract from the National Heritage List, below.

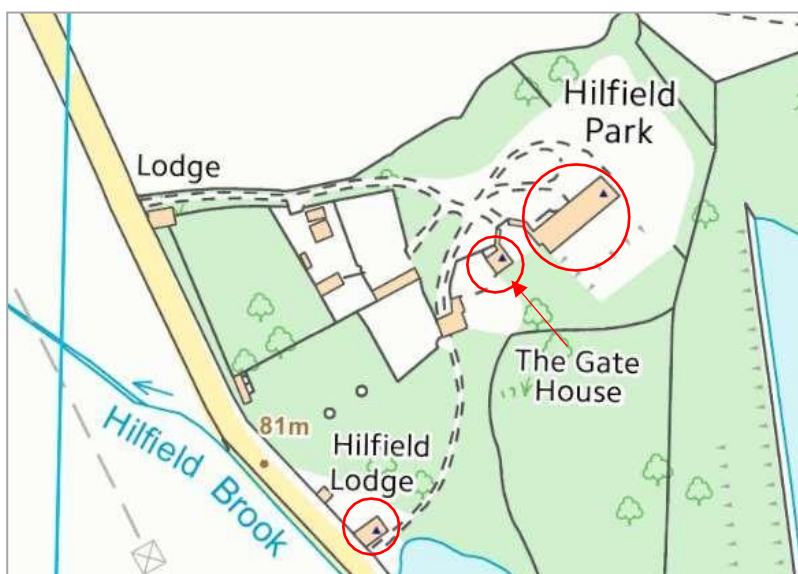




Figure 3 – Extract from the tithe map of Aldenham, dated 1839 (north is not exactly at the top) showing Hilfield Castle, then known as Hill Field Lodge, in its wider context. The various land parcels have been annotated to show ownership, occupation, name of land parcel, and use. Essentially, it was all owned as an estate to be enjoyed by John Fam Timins.

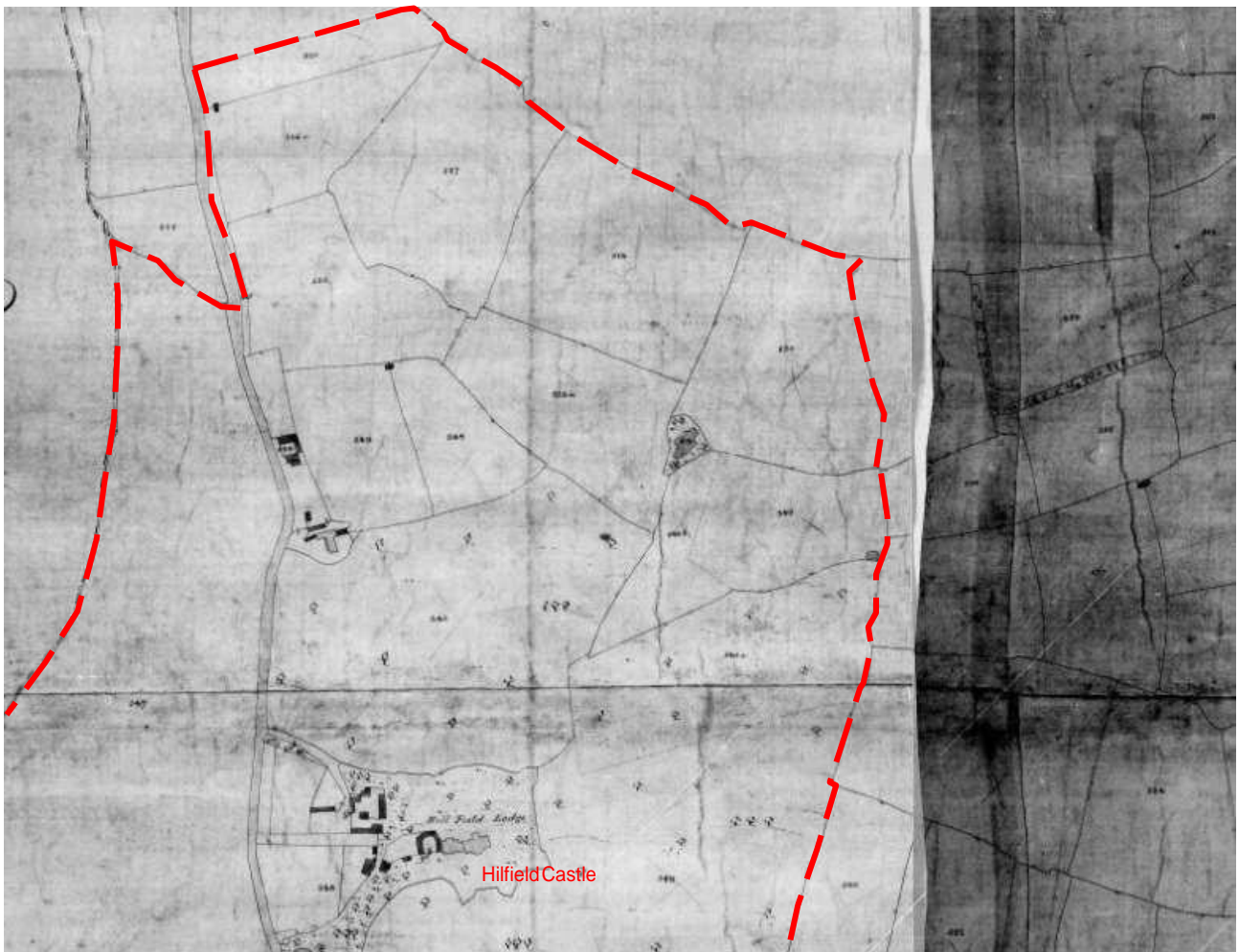


Figure 4 – Extract from the tithe map of Aldenham, dated 1839 (north is not exactly at the top) showing Hilfield Castle, then known as Hill Field Lodge, in its wider context. The tithe apportionment confirms the extent of Hilfield Castle estate, all of which was in the ownership and occupation of John Fam Timins.



Figure 5 - Extract from the O.S. map of 1899, revised 1895. The stippled effect is a map convention once used by surveyors to denote what they considered to be parkland (it was not related to land ownership).

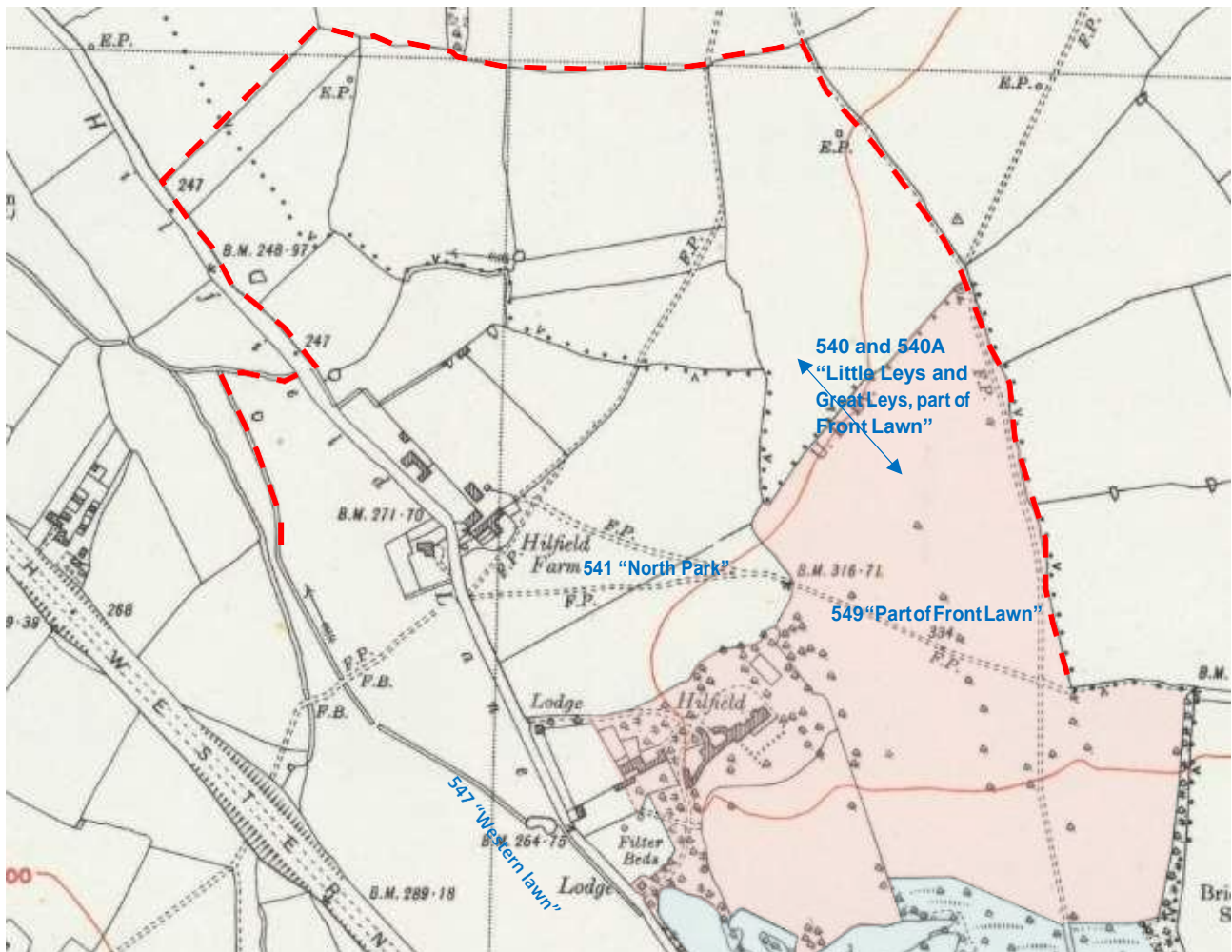


Figure 6 – Extract from the O.S. map of 1946, revised 1938. The northern boundary of Hilfield Castle Estate has been indicated with a red pecked line, taken from the evidence of the tithe map and apportionment (Figure 4). The extent of the “park”, as indicated on the OS map in Figure 5, is shown with a pink wash. Names of land parcels, taken from the tithe map and apportionment (Figure 3) have been added. They extend beyond the “park” as it was indicated by the Ordnance Survey.

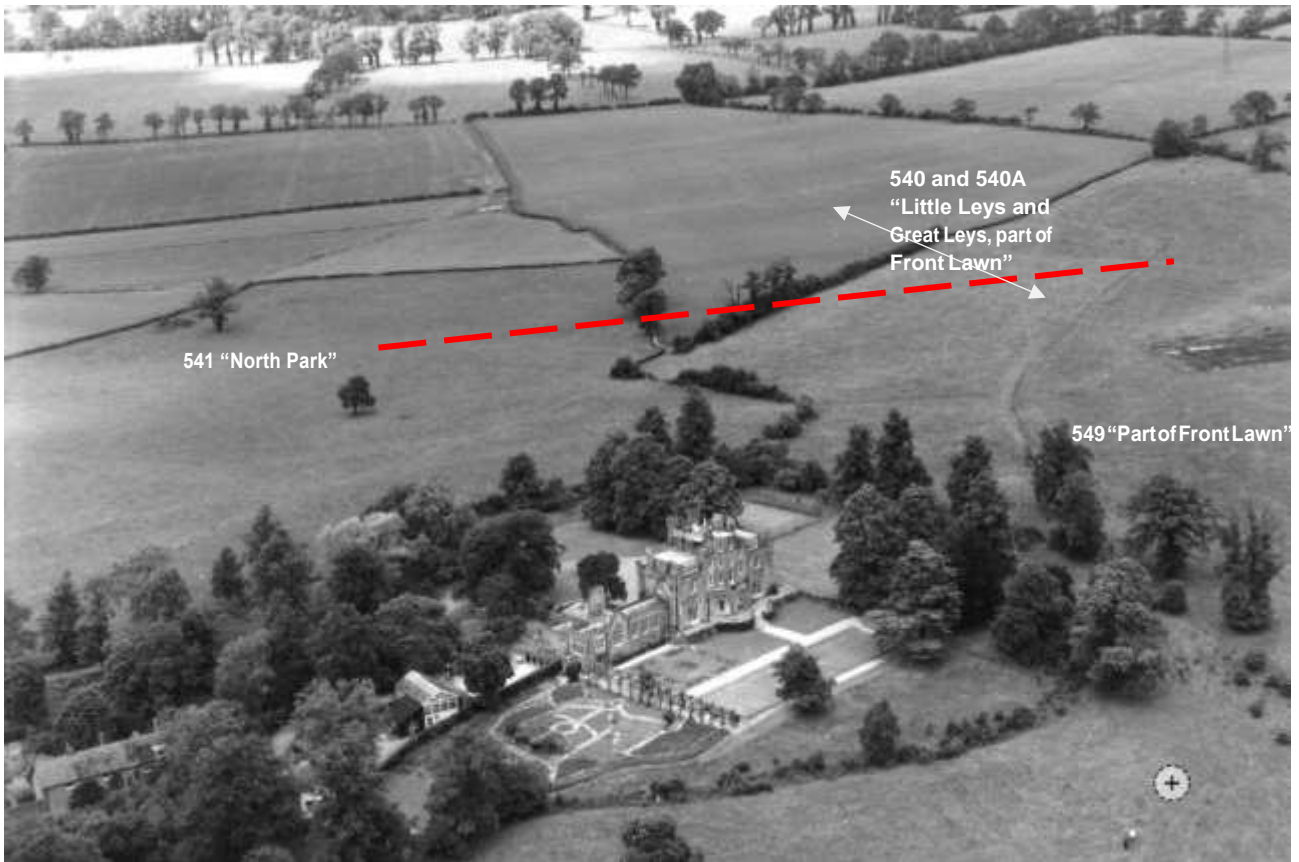


Figure 7 – Hilfield Castle seen from the south in 1949 (Aerofilms EAW 023652). On the assumption that the end of the aerodrome runway has not changed significantly, and with reference to the proposed site layout below, the closest edge of the solar array would be roughly at the red pecked line on the 1949 photograph. The names of the land parcels have been annotated, according to the evidence of the tithe map and apportionment.





Figure 8 – Detail of Hilfield Castle from the air, as it was in 1949 (Aerofilms EAW 023654). looking at the long south-east elevation.



Figure 9 – Bird’s Eye view of Hilfield Castle (Bing Maps) looking generally northward. The disposition of trees is very different from the way it appeared in 1949 (Figures 7 and 8), with more emphasis on perimeter planting, and the formal gardens have been replaced with lawns. The Appellant seems to be relying on the density of the perimeter planting (which may be more visually permeable in winter months) in order to suggest that the solar array will only have a relatively small effect on the setting of the grade II* listed building. This does not take account of the fact that the present arrangement (gardens and perimeter planting) is already a departure from what would have been experienced historically, by the Villiers and Timins families, and, indeed, by other occupants well into the 20th century. It may change again in the future.

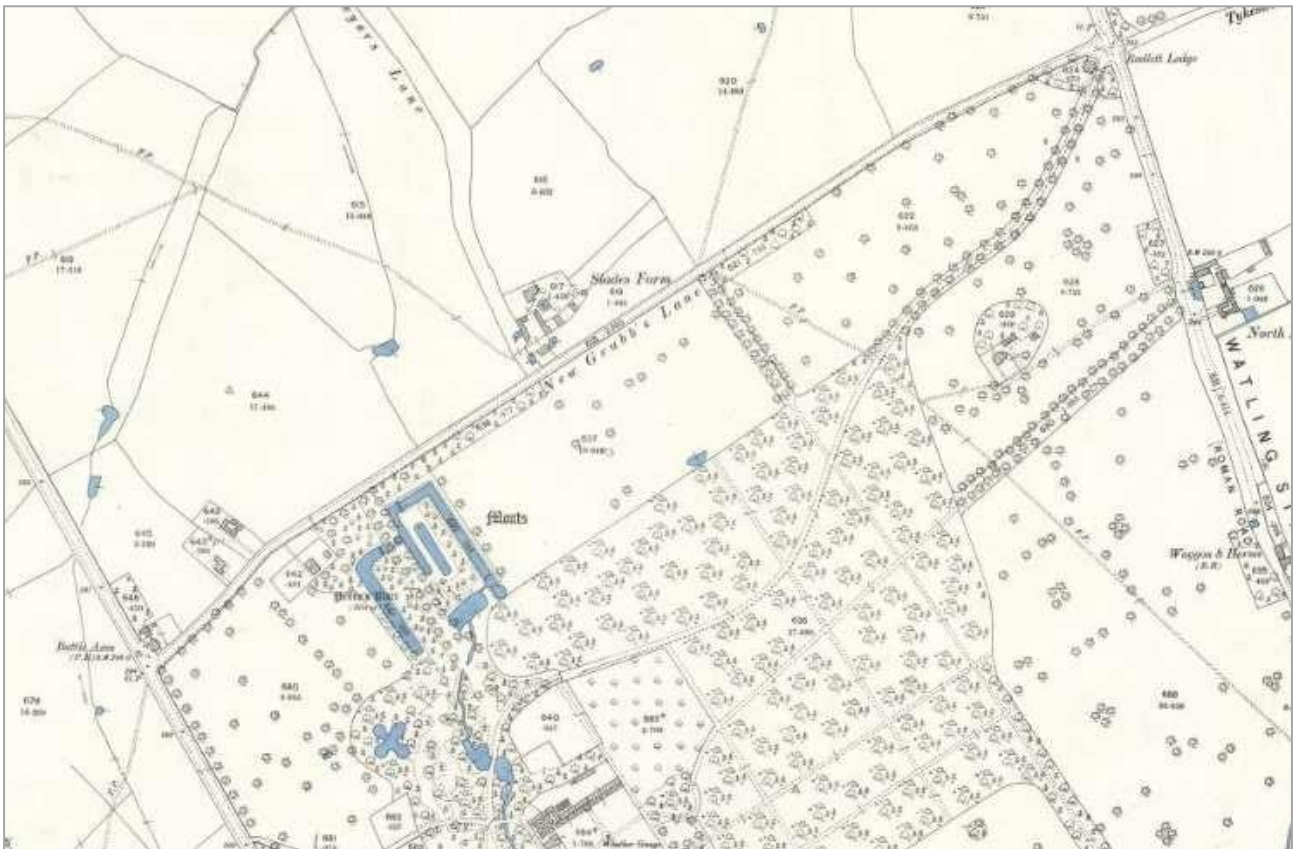


Figure 11 – Extract from the O.S. map of 1898, revised 1896, showing alterations to the northern part of Aldenham Park since the tithe map of 1839 (Figure 10), notably the creation of New Grubb's Lane (now Butterfly Lane) with the moats of Penne's Place shown with a blue wash. Slade's Farm is named on the map, and is enlarged below.

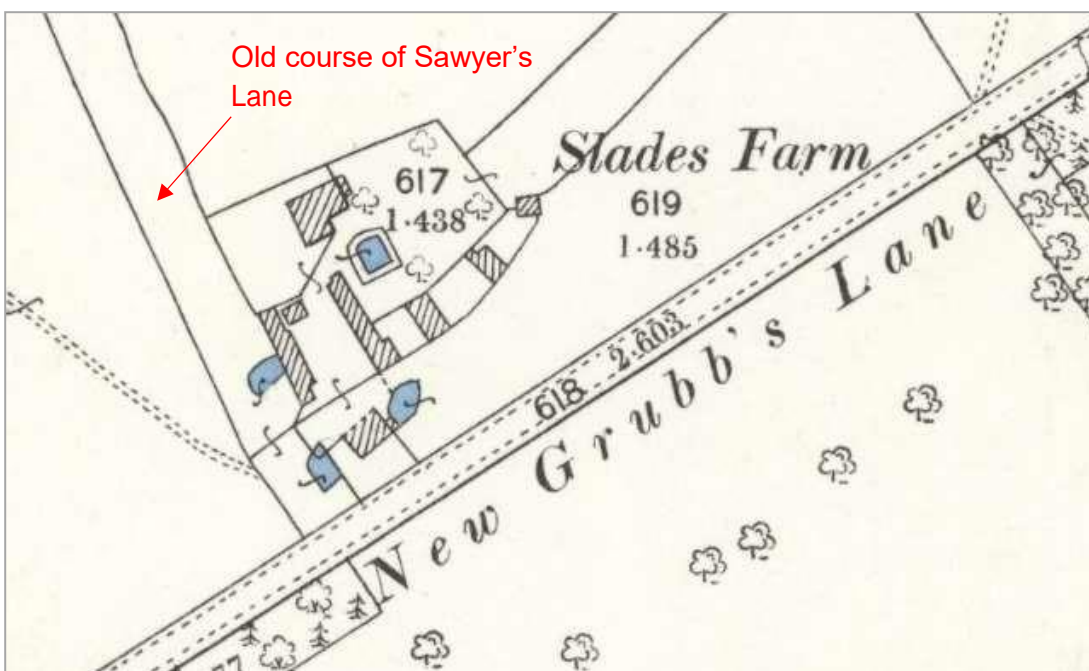




Figure 10 – Extract from the tithe map of Aldenham, dated 1839 (north is not exactly at the top). Parcel 438 is described as “Pens Place” on the tithe apportionment (27 July 1840), and has been shown with a pink wash. At that date the “Homestead” now known as Slade’s Farmhouse was in agricultural land to the north of the park, and Butterfly Lane did not exist. Its future course is shown indicatively with a red pecked line (see Figure 11).

The “Homestead” was in the ownership of Sarah Noyes, and in the occupation of Henry Dickinson, at the time of the tithe apportionment. Five men called Henry Dickinson were recorded in Aldenham in the 1841 census. The one most likely to have occupied the “Homestead” was Henry Dickinson, aged 80, living with his assumed wife and son, aged 70 and 30 respectively, and two male servants – probably farm labourers. The association has been made partly by the address, which was given as “Aldenham Wood, Elstree”, and because it is close, in the schedule, to the entry for Thomas Marriott, victualler, who kept the pub known as The Wrestlers.

All the fields around the Homestead (Slade’s Farmhouse) were in use as grass at the time of the tithe apportionment in 1840. Even the fields to the south, quite close to the main building shows as “Aldenham Park” (and west of “Aldenham Wood”) were described as being in use as grass, rather than being part of a park. It is plain, from the apportionment, that they were let to tenants, and were in agricultural use. They have the irregular appearance of piecemeal or informal enclosures, typical of the late medieval and early modern periods, around the time when Penne’s Place would have been active.



Figure 12 – Bird’s eye view of Slade’s Farmhouse (arrowed, with enlargement below), looking almost due north. It can be seen that there has already been pressure on the setting of the listed building on the north-east side, where there are modern buildings and hardstandings. The proposed solar farm would bring panels around northern side of the listed building, further removing it from the agricultural surroundings that have been, historically, part of its function and significance.





Figure 13 - Slade's Farmhouse, looking north-east.

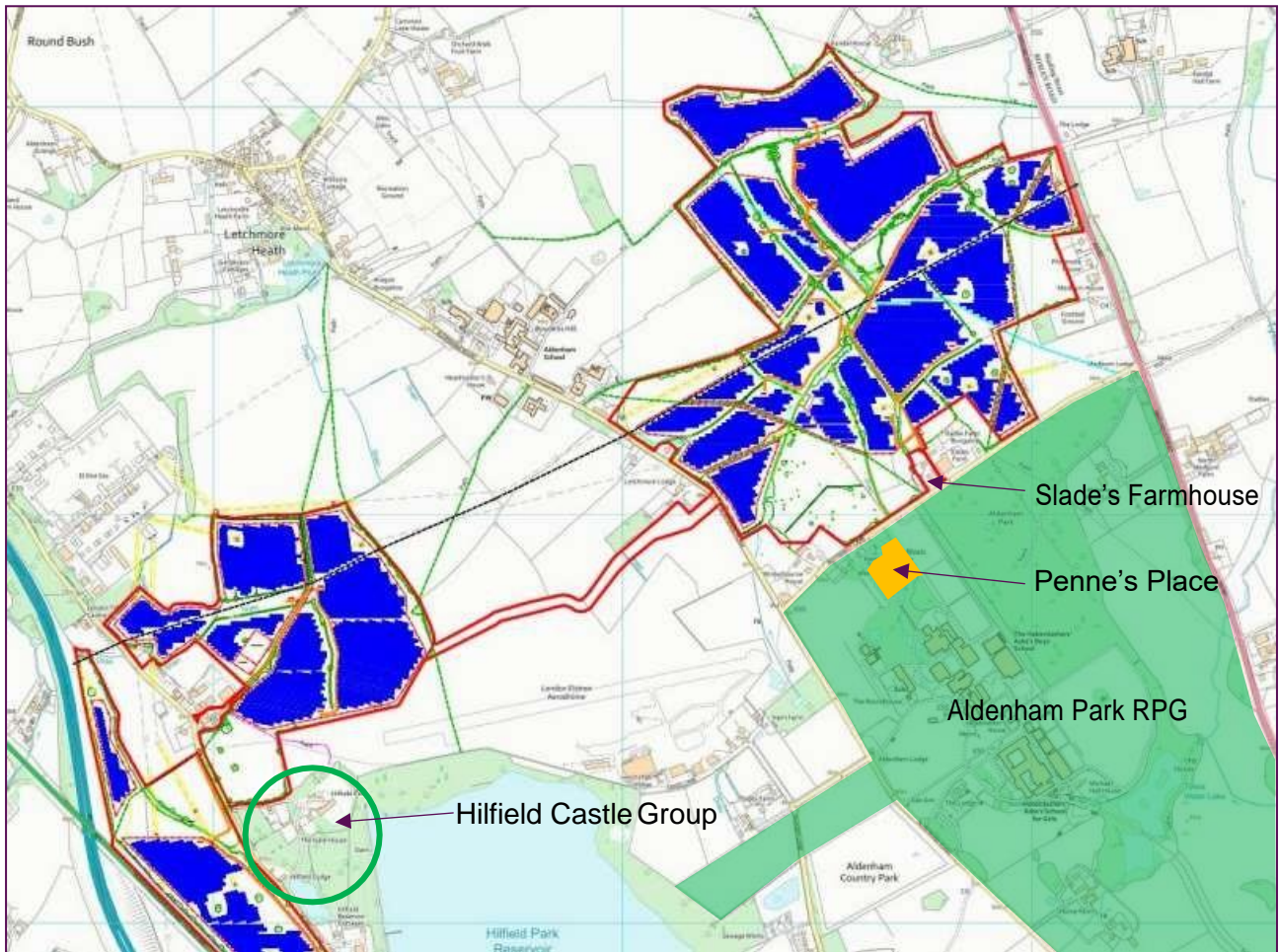


Figure 14 – This map of the application layout is taken from Figure 11 in the Design and Access Statement. It has been annotated with the addition of a green wash showing the extent of Aldenham House RPG, and the locations of other heritage assets. It is intended to give the Inspector an impression of the size and closeness of the proposed solar farm to the designated heritage assets.



Figure 15 – Bird's eye view of Penne's Place scheduled monument, which is within the rectangular group of trees in the centre of the photograph. The view is looking almost due north.

Appendix 4

Landscape Statement prepared by Claire Browne, Landscape Director, HCUK Group



Landscape Statement

Hilfield Solar Farm,
Aldenham,
Herdfordshire

Pins Ref:
APP/N1920/W/22/3295268

September 2021 | Project Ref 8229



HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. We began life as Heritage Collective LLP in 2010, before becoming Heritage Collective UK Limited in 2014. Finally, in 2020, we became HCUK Group Limited.



Project Number: 8229

File Origin: <https://heritagecollectiveuk.sharepoint.com/sites/Projects/Shared Documents/Projects 8001-8500/8201-8300/08229 - Hilfield Solar Farm, Aldenham/LAND/Reports/2022.09.15 8229 Hillfield Landscape Statement - V2.docx>

Author with date	Reviewer code, with date
CB 2022.09.09	VS 2022.09.15
CB 2022.09.15	VS 2022.09.16

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1. Introduction

- 1.1** This Landscape Statement has been prepared by Claire Browne, Director of HCUK Group, on behalf of Aldenham Parish Council. It forms an appendix to the evidence of Mrs Valerie Scott, Principal Planning Consultant of HCUK Group, in support of the Parish Council's case as a Rule 6(6) Party in an appeal relating to Hilfield Solar Farm, Aldenham, Hertfordshire.
- 1.2** Claire Browne has twenty-two years of continuous employment in the landscape sector and has undertaken landscape and visual assessments for a large number of solar schemes in addition to other renewable schemes.
- 1.3** A site visit was undertaken on 6 July 2022.

Approach to the statement

- 1.4** The council's Reason 1 reason for refusal states that the proposal would present Inappropriate Development in the Green Belt. It states:
- The proposal would be an inappropriate development that would be harmful to the openness of the Green Belt in which it would be located. The Council considers that the benefits that the scheme would bring are not such as would amount to very special circumstances sufficient to outweigh the harm to the Green Belt, even when the wider environmental benefits associated with the increased production of energy from renewable sources have been taken into consideration (pursuant to paragraph 151 of the National Planning Policy Framework 2021).*
- 1.5** The council's reason for refusal of planning permission states that the proposal is contrary to paragraphs 147 and 148 of the National Planning Policy Framework and contrary to Policy SADM26 (Development Standards in the Green Belt) of the Hertsmere Local Plan (Site Allocations and Development Management Policies Plan) 2016.
- 1.6** Whilst Green Belt is a land-use designation, this statement will focus on the effects of the development on the character of the landscape and views that contribute to

the essential characteristics of the Green Belt (GB). This is defined in the NPPF paragraph 137 as being their openness and their permanence.

- 1.7** Whilst it is accepted that the configuration of the network of fields would continue to remain with the development in place as stated in Paragraph 9.8 of the Appellant's Statement of Case (Pegasus Group, March 2022), the proposals will result in long-term adverse effects on the visual characteristics of the landscape and will extend across large tracts of countryside between Borehamwood, Bushey and Radlett. The undulating nature of the terrain and large-scale pattern of fields means that planting mitigation is less effective in screening solar panels in longer range views and in some location the panels will impact open ridgelines.
- 1.8** Another key consideration is the public enjoyment of the GB countryside, where the perceived sense of openness is intrinsic to the experience. The panels will be 3m in height above ground level, well above eye level. As the set-back between the Public Right of Way (PRoW) routes and the development area is often limited, the introduction of panels particularly on both sides of a footpath route, can channelise views and erode any perceived sense of openness. In some locations, the developed area may be elevated above the viewer/ visual receptor, further increasing the sense of intrusion by built-development on the rural character.
- 1.9** There are several parties to this appeal, and several consultees have given opinions on the effect of the proposal on landscape matters, including Place Services (on behalf of the council), and Natural England. The assessment in the present Statement stands on its own merits, and does not seek to respond to, or engage with, any of the other third-party assessments that have been made.
- 1.10** As a general introductory observation, the Inspector's attention is drawn to HCUK Figure 8229-1 (Appendix 5 of the Proof of Evidence of Valerie Scott), which shows the spatial relationship between the two main parts of the proposed solar farm and the Public Rights of Way network that run across the Site or are within the Zone of Theoretical Visibility (ZTV) of the proposals.

2. Methodology

- 2.1** The supporting Landscape and Visual Impact Assessment (LDA Design December 2020) submitted as part of the Environmental Statement is considered to follow best practice guidance as set out in the GLVIA3 and other relevant technical notes produced by the Landscape Institute and Natural England. The methodology clearly outlines the terminology used in the assessment for assessment of sensitivity, magnitude and significance.
- 2.2** A set of representative photomontages is provided for 5no. of the assessment viewpoint locations (1,2,3,9 and 11). These photomontages only show the proposed development at Year 1 with recent proposed planting mitigation. It is an omission not to represent the scheme when planting is established (year 5 or 10) to show what the impact on the openness of the landscape would be and the degree of screening the planting will provide.
- 2.3** With reference to magnitude of change, the extent of effects is assessed for all receptors and indicates the geographic area over which the effects will be felt. The LDA methodology states that a localised effect is an effect that impacts the Site and surroundings up to 2km, or part of receptor area (up to approx. 25%). Considering the extent of the Site is c.130 hectares and 65% of this is proposed as built development as a solar farm, the effect could be described as localised but can still effect large areas of the Site and surrounding areas and therefore should not be downplayed.
- 2.4** It would have been beneficial for the applicant to provide a more comprehensive assessment of sequential visual effects on users of PRow within the Site to describe the extent and nature of changes along the routes of the public footpaths as a finer grain assessment. Cross-sections would be beneficial to show in more detail how the layout of the panels has been designed to be sympathetic to topography.
- 2.5** This statement considers the cumulative visual effects on receptors, specifically users of the dense public footpath network through the Site. Whereas a cumulative assessment would only normally be undertaken in relation to other planned or consented developments outside of the Application Site, it is considered here owing to the fact that the Application Site covers an extensive area and is undulating so

that several fields may be viewed in combination. Reference is made to Table 7.1 of GLVIA3 in describing cumulative visual effects as follows:

Table 7.1 Types of cumulative visual effect (summary based on SNH, 2012)		
Generic	Specific	Characteristics
Combined Occurs where the observer is able to see two or more developments from one viewpoint.	In combination	Where two or more developments are or would be within the observer's arc of vision at the same time without moving her/his head.
	In succession	Where the observer has to turn her/his head to see the various developments – actual and visualised.
Sequential Occurs when the observer has to move to another viewpoint to see the same or different developments. Sequential effects may be assessed for travel along regularly used routes such as major roads or popular paths.	Frequently sequential	Where the features appear regularly and with short time lapses between instances depending on speed of travel and distance between the viewpoints.
	Occasionally sequential	Where longer time lapses between appearances would occur because the observer is moving very slowly and/or there are larger distances between the viewpoints.

Extract of Table 7.1 from GLVIA3 Types of Cumulative Visual Effect

3. Planning Policy Framework

3.1 The following section highlights Green Belt policy that is cited in the Reason for Refusal and associated landscape and visual considerations.

National Planning Policy Framework

3.2 Whilst Green Belt is a land-use rather than a landscape designation, this is considered in further detail in the planning statement of case, however the openness of the landscape character does contribute to the five purposes of the Green Belt, defined in Paragraph 138 as:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns margining into one another;

- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban generation, by encouraging the recycling of derelict and other urban land.

3.3 The Reason for Refusal refers specifically to Paragraphs 147 and 148 stating that inappropriate development that is harmful to the Green Belt should not be approved except in very special circumstances and requires Local Authorities to ensure that substantial weight is given to any harm to the Green Belt. It states 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.

3.4 Paragraph 151 states that many renewable projects in the Green Belt will constitute inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

Local Policy

3.5 Local Policy is set out in the Hertsmere Local Plan Core Strategy (January 2013) and the Site Allocations and Development Management Policies Plan (November 2016). Policy SADM27 (Development Standards in the Green Belt) is referred to specifically in the Reason for Refusal. The policy outlines considerations for landscape and visual effects as follows:

- (i) developments should be located as unobtrusively as possible and advantage should be taken of site contours and landscape features in order to minimise the visual impact;
- (ii) buildings should be grouped together: isolated buildings in the countryside should be avoided;
- (iii) existing open and green space in the area, including garden areas, should be retained;

- (iv) the scale, height and bulk of the development should be sympathetic to, and compatible with, its landscape setting and not be harmful to the openness of the Green Belt;
- (v) developments should use materials which are in keeping with those of the locality, and, where modern materials are acceptable, they should be unobtrusive;
- (vi) existing trees, hedgerows and other features of landscape and ecological interest should be retained and enhanced in order to enrich the character and extent of woodland in the Community Forest in line with Policy SADM13;
- (vii) the viability and management of agricultural sites should not be undermined, there also being a strong presumption against development which would fragment a farm holding. The scale of development will be controlled. ... (iii) limited infilling or redevelopment on a previously developed site must have no greater impact on the openness or purpose of the Green Belt than the existing permanent development.

4. Baseline

4.1 The LVIA describes the Site as:

comprising an agricultural landscape of generally medium to large fields located within a well-established vegetative context, linked by a network of generally well-established field boundary and roadside vegetation.

Fields 1 and 2 of the western parcel are relatively self-contained between vegetation of Hilfield Lane and the A41. Fields 3, 4 and 5 of the western site parcel are generally more open in character being located in the bowl landscape that rises up to Elstree Aerodrome.

The undulating topography and large field pattern of the eastern site parcel give rise to a more open agricultural landscape although views beyond the site are limited by boundary vegetation.

Both eastern and western site parcels contain in general a strong field boundary network. Vegetation along Aldenham Brook in the eastern parcel and Hilfield Brook in the western parcel also contribute the fabric and character of the Site.

- 4.2** The baseline assessment provided in the LDA LVIA is not contested, rather the Inspector’s attention is drawn to the following landscape and visual characteristics that make the Site particularly susceptible to the proposed solar farm development and location of development.
- 4.3** The topography of the Site is described as gently undulating and ranging between 100-80m AOD. The undulating landform does provide opportunity for sweeping panoramic views across the agricultural landscape.
- 4.4** The terrain of the western parcel rises from Hilfield Lane to an elevated ridgeline of 95-100m AOD near Elstree Aerodrome at the eastern extent of Field 5. This open ridgeline is intervisible from lower lying areas crossed by PRoW (such as LVIA Viewpoint 2 Hilfield Lane) and contributes to the sense of openness of the landscape. It is therefore a characteristic of the landscape character that is sensitive to this type of development.
- 4.5** The landform of the Eastern Parcel is more gently undulating and is characterised by slightly elevated land to the periphery of the parcel, surrounded by the lower lying the Aldenham Brook. Dispersed farmsteads, including Slade Farm, small hamlets and Aldenham Senior School are located on the raised ground and are intervisible across the lower-lying plain from the dense network of public footpaths. This visual connection and intervisibility of local landmarks across the open landscape is a characteristic of the sequential views experienced from the public footpaths that cross the Eastern Parcel.
- 4.6** Whilst there is a relatively strong network of hedgerows across the Site as stated in 5.5.1 of the LVIA, in some locations, the undulating terrain diminishes the height of the hedgerows in the landscape and the landscape essentially has an open character across extensive areas of the Site.
- 4.7** The Appellant’s SOC refers to the Appeal Site as being semi-urban in character with some localised intrusion of man-made features. This description does not recognise the differentiation between the character of the Eastern and Western Parcels. The Eastern Parcel, whilst crossed by pylons and the eastern boundary is influenced by the adjacent sports field, the rural character is judged to be more intact with a higher level of tranquillity. The Western parcel is more influenced by urban-rural

fringe uses, busier transport corridors, the National Grid Elstree Substation and overhead light aircraft using the aerodrome.

5. The Proposed Development and Mitigation

5.1 The LVIA and Landscape and Ecology Management Plan (LEMP) by LDA Design sets out the key principles for mitigating the scheme. Primary mitigation includes:

the allowance of generous offsets of security fencing and panels of at least 5m either side of existing PROW and planting with wildflowers to maintain visual amenity and openness from these routes and avoid perceived channelling / tunnelling.

5.2 The Landscape and Ecology Management Plan shows several routes that will be flanked by solar panels on both sides where no planting is proposed (other than wildflower seeding) to maintain the openness of the landscape. The panels will not be screened by vegetation in these locations and therefore visual intrusion by built features will be a long-term change to the visual character.

5.3 A key consideration is whether this distance is sufficient to minimise the increase in enclosure from the panels that will be experienced by footpath users and the channelling / tunnelling of views along the route. The proposed solar panels are a maximum of 3m in height above ground level. The Appellant's Statement of Case (paragraph 9.6) refers to the low-profile nature of the panels and that these would cause no material harm on the openness of the Green Belt. At 3m in height above ground level, this is well above eye-level of users of PROW and can increase the level of enclosure even at a distance of 5m.

5.4 Further to this, the undulating nature of landform may elevate the development area of the panels above the ground level of the public routes through the Site, thus potentially increasing the level of enclosure and intrusion into the open landscape.

5.5 The mitigation will alter the management of hedgerows to enable them to grow taller and field boundaries will be reinforced with additional hedgerow planting. As

some of the fields are large in scale and the terrain is undulating, the effectiveness of hedgerows to provide sufficient levels of mitigation is questionable. In some locations the field boundaries are in localised depressions diminishing their visual impact and elevated land of the development area remains intervisible in the middle and far distance. In summary this large-scale undulating landscape is susceptible to this type of solar development and cannot easily be mitigated.

- 5.6** The Landscape and Ecological Enhancement Plan does propose to introduce hedgerows in specific locations

6. Landscape and Visual Effects

- 6.1** The following section considers the likely landscape and visual effects of the proposed solar farm development focussing in the impacts on the openness of the landscape character and visual receptor groups within the Site i.e. users of PRow within the eastern (Aldenham 032, 040, 042, 043, 044) and western (Bushey 036, 037, 038, Aldenham 014, 030) site parcel and the recreational experience of the PRow.

Landscape Character Effects

- 6.2** The findings of the LDA LVIA states in Paragraph 7.2 Effects on Landscape Character are that the proposals will result in large scale effects on the character of the Site, resulting from the change from agricultural to built development and I am in agreement with these findings.

Large scale effects on landscape character (Total or major alteration to key elements, features, qualities or characteristics, such that post development the baseline will be fundamentally changed) would be limited to the Site itself, and areas with visibility of the Site immediately adjacent to it (Figure 4), where the Site would change from an agricultural landscape to a solar farm development set within the existing agricultural field structure.

- 6.3** The LVIA states that the Site is generally characteristic of the Borehamwood Plateau landscape character area (LCA) being reflective of the intensive, agricultural landscape of this area. The LVIA assesses effects on LCA 22 Borehamwod Plateau as follows in Paragraph 7.3.1.

The Borehamwood Plateau is judged to be of Medium susceptibility ('undue consequences may arise') from the Proposed Development and it to be of Local/District value as set out in Section 5.7.2. Taking both value and susceptibility into account, the sensitivity of the Borehamwood Plateau LCA is assessed as Medium. As set out in Section 7.2, Large scale effects would arise within and within the immediate context of the Site and extend up to 100m south of Field 5 and north of Field 4. Large scale effects therefore would affect a Localised extent of this character area for a Medium-term duration until planting has had time to mature. A High/Medium magnitude of effect is concluded resulting in Major-Moderate and Adverse effect to the Borehamwood Plateau character area.

6.4 The assessment of effects on landscape character at Year 1 is judged as being significant and this is not contested. Whilst the terminology used somewhat diminishes the severity of the effect referring to localised impacts that only effect the Site and immediate context, the fact is that an extensive area of Green Belt countryside will be affected, where c. 85 hectares will be covered by built development. Furthermore, it should be noted that the Site makes up a large proportion of the overall LCA 22 Borehamwood Plateau landscape character area (LDA LVIA Figure 5) and that the key characteristics for a large area of this LCA will change for the long-term/ semi-permanent duration.

6.5 The significance of the long-term/semi-permanent effects to character are contested. The LVIA states:

Once planting has matured, effects to character would largely be confined to the Site itself. A Medium scale of effect would occur affecting a Localised extent of the character area for a Long-term/Semi-Permanent duration. A Medium magnitude of change is anticipated resulting in Moderate and Adverse effects to the Borehamwood Plateau LCA.

6.6 No verified photomontages are provided in the LVIA to demonstrate the long-term effects on character once vegetation has established. It is highly questionable, given the extent of the proposals and the undulating nature of the Site that the established planting will reduce the scale of effect to Moderate and Adverse in the long-term/ semi-permanent duration. For example, where hedgerow planting is proposed to the southern boundary of Field 5, landform rises up behind the

hedgerow and a large area of panels will remain visible above and on the ridgeline (see Viewpoint 2 and Viewpoint 3 which is located outside of the Site. The Site makes up a large proportion of the Borehamwood LCA area and the visual character within the Site and some parts of the site boundary will continue to experience a significant level of change to the visual character.

- 6.7** Viewpoint 1 with development (Restricted byway from A41, Bushy 036) shows that the introduction of a new hedgerow to Field 1 will enclose this field reducing the open character in the long-term.
- 6.8** Viewpoint 2 photomontage demonstrates that the panels will adversely impact the open ridgeline in the eastern part of Field 5. This will adversely affect the character of the landscape in the long-term where the built form of the panels will interrupt the skyline.
- 6.9** Viewpoint 3 from the Restricted Byway to Elstree Aerodrome (Bushey 038) 90m south of the development, demonstrates that a vast swathe of panels will continue to impact on the visual character of the landscape in the long-term for the lifetime of the development. Once the hedgerow to the field boundary has established, panels will continue to affect the visual character owing to the undulating nature of the landform. The sense of openness is retained, although the panels would connect to the existing built development of the large substation and will lead to significant encroachment across much of this landscape replacing the agricultural character.
- 6.10** Viewpoint 4 Footpath to Letchmore Heath (Aldenham 014) is taken from the elevated ridgeline within Field 5. The large arable fields and wooded skyline creates a simple rural character that contrasts with the wider urban fringe setting. At this elevation there is a perceived degree of separation from the intrusive built elements of the substation and farm located on lower land at some distance. As the illustrative viewpoint demonstrates, large swathes of fields will be replaced with solar farm development. Whilst panels are offset and, on the edge, or below the ridge, the panels will result in encroachment of the agricultural landscape with built development across a large area, extending the perceived urban fringe into the rural landscape. The wildflower corridor will retain the sense of openness outside of the security fence, although encroachment of the rural landscape by built-features across a vast area will remain into the long-term.

- 6.11** Viewpoint 6 Marsh Cottages (Footpath Aldenham 040) is shown as an illustrative viewpoint from within Field 7. At this location the intervisibility between fields in the Eastern Parcel is apparent owing to the undulating characteristics of the landform. The proposed mitigation will introduce a screen planting belt along the easement corridor thus reducing the size of the field and degree of openness and intervisibility with the wider landscape.
- 6.12** Viewpoint 7 at Slade Farm shown as a representative photomontage shows that development in several fields will be intervisible, even when hedges establish, owing to the undulating landform. This increases the perceived encroachment of the rural landscape by built development.
- 6.13** The panels will significantly reduce the sense of openness within the flatter lower lying large scale fields in central parts of the Eastern Parcel, across a significant area as shown by Viewpoint 11 as a photomontage and Viewpoint 12. Some openness will be retained along the Aldenham Brook Corridor, although enclosure across much of this area will increase significantly with the introduction of 3m high panels.
- 6.14** In summary, the large-scale nature of the fields and undulating landform across much of the Site is difficult to mitigate successfully. The perceived sense of encroachment of the countryside by built development is intensified when several developed fields are intervisible with one another. The panels will adversely impact the open ridgeline in Field 5 and the introduction of hedgerows in localised areas, such as Field 1 and 7 will be a change that will remain at decommissioning, that will reduce openness permanently. The proposed development area is extensive and represents a large proportion of LCA 22 Borehamwood Plateau.

Effects on Visual Receptor Groups and the Recreational Experience of the Site

- 6.15** The assessment by LDA Design does recognise long-term/ semi-permanent effects on the recreational users of the Site i.e. Visual Receptor Group 1: Receptors within the Site Receptors in this group include users of PRow within the eastern (Aldenham 032, 040, 042, 043, 044) and western (Bushey 036, 037, 038, Aldenham 014, 030) site parcels.

6.16 The findings of the LVIA are a large scale of change resulting in significant effects (Major-Moderate and Adverse). Seven viewpoints (Viewpoint 1, 3, 4, 8, 9, 11 and 12) will remain as experiencing either large or large-medium scale of change in the long-term to semi-permanent timescale. The LVIA states that:

The scale of change to these receptors would be Large, affecting a wide extent of the receptor group in both the Medium and Long-term/Semi-Permanent time period. A High magnitude of change is anticipated resulting in Major-Moderate and Adverse effects.

6.17 The current recreation experience is partially impacted by detractors such as pylons, light industry and intermittent light aircraft, although mainly concentrated to the lower lying land of the Western Parcel. The elevated part of the Western Parcel along the ridgeline offers an experience of an open rural landscape with a simple composition of large agricultural fields and wooded skylines that contribute has a detachment from the urban fringe of the lower-lying areas. The Eastern Parcel has a strong rural character, albeit crossed by pylons, but offering a reasonable level of tranquillity despite sports uses to the periphery.

6.18 The Site has a dense network of PRow passing directly through the Site and the developable areas for solar panels. Parts of PRow Aldenham 030 in the Western Parcel and Aldenham 042, 043 and 040 will be flanked both sides with solar panels with what appears to be a minimum offset of 5m either side of these routes. The views will remain "open" with no hedgerow planting to avoid the "channelisation" of routes. These views have not been presented as photomontages but inevitably the level of enclosure along these routes in particular will substantially increase and will remain as a semi-permanent effect on views and on the openness of the Green Belt land.

6.19 It is accepted that the enhanced green infrastructure corridors and parkland areas will provide some benefit although with these measures in place, the findings of the LVIA are that the major-moderate adverse effects will continue to remain for users of the Site in the long-term / semi-permeant duration.

6.20 The proposed development will seriously compromise the recreational value of a large tract of countryside that is easily accessible to surrounding settlements for the

duration of a generation. Significant adverse permanent effects are judged to remain and this is inconsistent with policy requirements.

Cumulative Visual Effects

6.21 Whereas a cumulative assessment would only normally be undertaken to in relation to other planned or consented developments outside of the Application Site, it is considered here owing to the fact that the Application Site covers an extensive area and is undulating so that several fields may be viewed in combination.

6.22 When several fields are viewed in combination in one view or in succession when the eye is moved from one direction to another impacts can be further intensified as the perception of the visual receptor is one of being surrounded by development. With the development in place this can occur where landform changes are more distinct and solar panels remain visible in the distance.

6.23 The following visual receptors are considered to continue to experience important levels of residual cumulative visual effects in the long-term / semi-permanent duration:

- Users of Footpaths Aldenham 040 and 042 – several fields are viewed in combination and in succession.
- Users of Footpaths Bushey 037 – several fields are views in combination and in succession.
- Users of Footpaths Aldenham 014 / Bushey 046 – several fields are viewed in combination and in succession.
- Users of Elstree Aerodrome – several fields are viewed in combination.

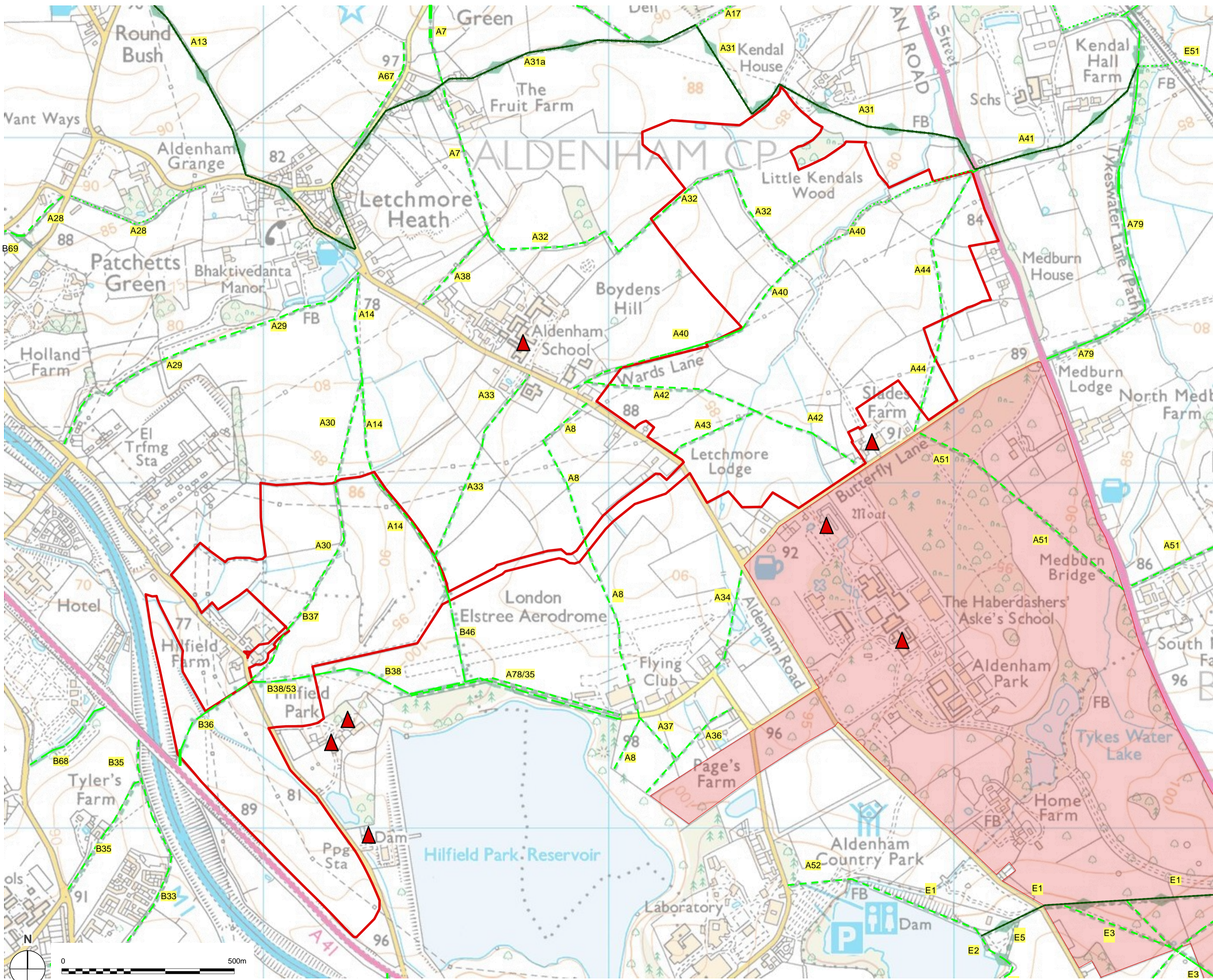
Conclusions

6.24 Given the large-scale fields and the undulating nature of the terrain is difficult to mitigate against effects of visual intrusion and encroachment of the rural character by the solar development.







- 6.25** The solar panel development in Field 5 is judged to adversely impact the open ridgeline.
- 6.26** Development is likely to be intervisible between fields affecting the visual character of large areas, owing to the undulating terrain.
- 6.27** The introduction of hedgerows in localised areas, such as Field 1 and 7 will remain at decommissioning, and reduce openness permanently in these areas.
- 6.28** The proposed development area is extensive and represents a large proportion of LCA 22 Borehamwood Plateau that will experience long-term substantial changes to character.
- 6.29** The Site is crossed by a dense network of Public Rights of Way, providing a large tract of easily accessible countryside of recreational value for the surrounding settlements. Users of PRoW currently experience views across large open agricultural fields and the undulating landscape creates sweeping panoramic views, with a sense of prospect towards surrounding settlements and hamlets.
- 6.30** The perceived level of encroachment by development and high level of enclosure created by panels where there is minimal offset will compromise the recreational value of the Green Belt land. Significant adverse visual effects will continue to remain for users of the Site in the long-term for a semi-permanent duration.

Appendix 5

Plan showing Public Rights of Way and Heritage Assets



- GENERAL NOTES:
1. Do not scale from this drawing.
 2. Drawing is for the intended purpose as stated in the status box of the title block.
 3. HCUK accept no liability arising from any variation to this drawing without prior approval obtained.
 4. Check all dimensions on site.
 5. Report any discrepancies and omissions to HCUK Ltd.
 6. This drawing is copyright.

- KEY**
-  Hillfield Solar Farm Site boundary
 -  Long Distance Walking Routes
 -  Designated Public Right of Way (PRoW) number
 -  Bridleway
 -  Footpath
 -  Heritage Asset
 -  Aldenham Register Park and Garden

For the layout of the proposed solar farm, please refer to drawing:
 21_0050_FULEI-PROPOSED_SITE_LAYOUT_PLAN-1192878

Revision	Description	Date
-	First Issue	21/7/22



W: www.hcukgroup.co.uk

Client: Aldenham Parish Council

Project: Hillfield Solar Farm

Description: Heritage Features

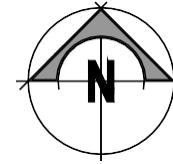
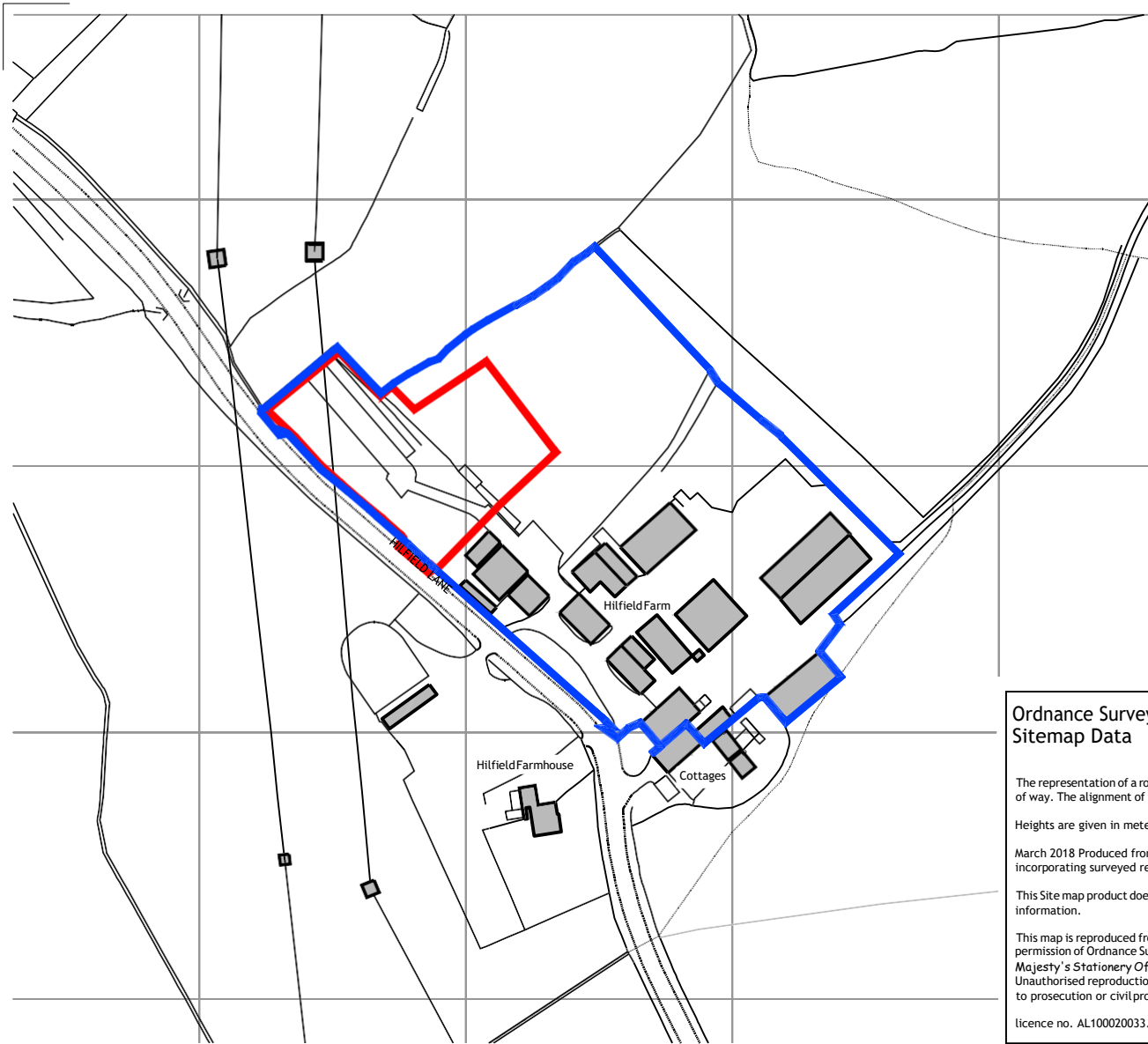
Status: For Planning

Scale: 1:5000@A1 Drawn I Checked SH CB Date: 21/7/2022

Job Number: 08229 Drawing Number: 1 Revision: -

Appendix 6

*Site Plan and Appeal Decision Letter in respect of Application
LPA Ref: 18/1587/OUT and PINS Ref:
APP/N1920/W/19/3240825*



Note:

1. All dimensions noted are in millimetres unless stated otherwise.
2. Do not scale from this drawing, if dimensions are not clear ask.
3. This document has been created in accordance with Plandescil Ltd Terms & Conditions along with the scope of works provided by the client to Plandescil. Any use of this document other than for its original purpose is prohibited, Plandescil accept no liability for any third party uses of this document.
4. Plandescil Ltd to be immediately notified of any suspected omissions or discrepancies.
5. This drawing is to be read in conjunction with all other relevant documents relating to the project.

Legend	
—	Site Boundary
—	Ownership Boundary

FOR PLANNING

Rev	Date	Chkd	Description
B	19-07-18	OAJ	Site Boundary Amended
A	17-07-18	OAJ	Site Boundary Amended
0	12-03-18	RW	First Issue



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civil / structural / environmental / surveying

Client

Capbal Ltd.

Project

**Proposed Battery Storage
 Hilfield Farm, Elstree,
 WD25 8DD**

Drawing Title

Site Location Plan

Scale U.N.O.	Date	Drawn By
1:2500 (A4)	July 2018	MJP

Drawing No.	23101/150	Rev
		0

**Ordnance Survey
 Sitemap Data**

The representation of a road, track or path is no evidence of a right of way. The alignment of tunnels is approximate.

Heights are given in meters above Datum.

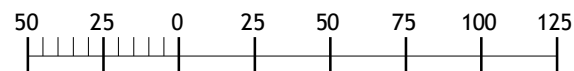
March 2018 Produced from Ordnance Survey digital and incorporating surveyed revision available at this date.

This Site map product does not contain all recorded map information.

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1:2500 - DRAWING SCALE REFERENCE (m)



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Appeal Decision

Site visit made on 10 March 2020

by **Helen O'Connor LLB MA MRTPI**

an Inspector appointed by the Secretary of State

Decision date: 24 March 2020

Appeal Ref: APP/N1920/W/19/3240825

Hilfield Farm, Hilfield Lane, Elstree, Hertfordshire WD25 8DD

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
 - The appeal is made by Ms Donna Clarke of Capbal Limited against the decision of Hertsmeare Borough Council.
 - The application Ref 18/1587/OUT, dated 27 July 2018, was refused by notice dated 28 May 2019.
 - The development proposed is described as 'Development of an energy storage system for a temporary period of 20 years from the date of first import/export of electricity comprising a battery storage compound, electricity compound, fencing underground cabling and other associated works, a new access from Hilfield Lane and hedgerow and tree planting'.
-

Decision

1. The appeal is dismissed.

Procedural Matters

2. The application is made in outline with all detailed matters reserved for separate consideration. As such, the Proposed Site Plan (Draft)¹ submitted with the appeal is illustrative and there may be alternative ways of developing the site. On that basis, it does not fundamentally alter the nature of the proposal and therefore, I am satisfied that no party will suffer injustice by my taking account of it. Nevertheless, in relation to the likely visual impact arising from the proposal the appellant has referred to the illustrative layout in some detail. Accordingly, I have specified in my decision those areas where I have given the illustrative layout particular consideration.

Main Issues

3. The main issues are:
 - Whether the proposal would be inappropriate development in the Green Belt, including the effect on openness, having regard to the National Planning Policy Framework (the Framework) and any relevant development plan policies;
 - The effect of the proposal on the character and appearance of the area;

¹ Drawing No. 23101/003/C

- If inappropriate, would the harm by reason of inappropriateness, and any other harm, be clearly outweighed by other considerations. If so, would this amount to the very special circumstances required to justify the proposal.

Reasons

Whether Inappropriate Development and consideration of openness

4. The Government attaches great importance to Green Belts. 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.
5. Paragraph 143 of the Framework stipulates that inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Development within the Green Belt is inappropriate with the exceptions of the types of development listed in Paragraphs 145 and 146 of the Framework.
6. Paragraph 145 (g) states that new buildings that constitute the limited infilling or the partial or complete redevelopment of previously developed land may not be inappropriate, subject to the caveat that the development should not have a greater impact on the openness of the Green Belt than the existing development. The appellant does not expressly indicate that the proposal would fall within any of the exceptions listed in paragraph 145, and by referring to very special circumstances², implies an acceptance that the proposal constitutes inappropriate development. However, she does refer to the land as being previously developed as being significant. Therefore, for completeness, I have considered whether paragraph 145 (g) applies in this case.
7. A building is defined in s336 of the Town and Country Planning Act 1990 as including any structure or erection, and any part of a building, but not plant or machinery comprised in a building. I am satisfied that the setting up of an Energy Storage System (ESS) similar to that shown on the illustrative layout and details³ would amount to operational development of a sufficient size, physical attachment and permanence so as to constitute a new building for the purposes of paragraph 145 of the Framework.
8. The Framework defines previously developed land as '*Land which is or was occupied by a permanent structure, including the curtilage of the development land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure.*' The parties disagree to the extent that the appeal site constitutes previously developed land, with the appellant suggesting that based on the planning history of the site, this amounts to over 80%⁴. Part of the appeal site has a Certificate of Lawfulness (CLEUD)⁵ referred to as 'Yard 7' which established the lawfulness of the use of the land for the storage of building equipment and materials. The submitted photographs⁶ and my observations, show an area of hardstanding which would facilitate such storage. Nevertheless, aside from the hardstanding,

² Paragraph 7.2.1.1 Appellant's Statement of Case

³ Drawings 23101/003/C & 23101/006

⁴ Paragraph 7.2.1.4 Appellant's Statement of Case

⁵ Reference 17/2489/CLE dated 27 February 2018

⁶ Appendix 10, Appellant's Statement of Case

- the evidence falls short of establishing that the wider appeal site is, or was otherwise occupied, by a permanent structure.
9. Moreover, the fragmentation of the occupation and uses of the land and buildings at Hilfield farm⁷ suggest that the appeal site does not comprise part of the curtilage to those existing buildings. Accordingly, notwithstanding that other parts of the appeal site may have been used in the past for parking, agricultural and other industrial and commercial uses⁸ (a matter to which I shall return later in my reasoning), based on the evidence presented, only a modest proportion of the site appears to fall within the Framework's definition of previously developed land.
 10. Planning Practice Guidance⁹ advises that openness is capable of having both spatial and visual aspects. The illustrative layout indicates that the positioning of the associated battery containers, transformer, switchrooms, access point and track, steel palisade fencing, CCTV and lighting would encompass an area of land considerably larger than the hardstanding within 'Yard 7' on the CLEUD. This is reinforced by the comparative aerial photograph and image of the illustrative model shown in the submitted Landscape and Visual Impact Assessment (LVIA)¹⁰.
 11. Moreover, the elevations and details of the main components of the development indicate that they would generally comprise of rectilinear structures of approximately 4 metres in height, set out in a fairly regimented format. The presence of the existing buildings at Hilfield Farm, Elstree Substation approximately 200 metres to the north, pylons and the M1 to the west do not diminish the physical effect of further built form. Therefore, the new structures and associated works would have an adverse spatial impact upon the appeal site exacerbated by their likely distribution across the land. Furthermore, the proposal would impact on the spatial openness of the appeal site to a greater extent than that shown historically for Yard 7 in the photographic evidence.
 12. In visual terms, although the LVIA, verified photography and 3D modelling show that there would be limited impact to wider views, there would nevertheless, be a moderate adverse change in the character of views from the local roads in the immediate vicinity¹¹. This would be particularly evident via the proposed new access onto Hilfield Lane. Whilst additional planting would mitigate the impact on wider views, it would be likely to take some time for this to establish. Furthermore, the illustrative layout indicates 7 lighting poles which, notwithstanding that controls might be exerted over external illumination to a degree, by comparison to the existing land would increase its visual prominence and have a negative effect.
 13. I acknowledge that the proposal would be for a limited 20 year period from first import/export of electricity, after which it would be possible to return the land to its former condition. This would reduce the harmful impact upon openness to an extent. Even so, such a period of time is considerable.

⁷ Appendices 2 & 3 Appellant's Statement of Case

⁸ Paragraph 7.2.1.3 Appellant's Statement of Case

⁹ Paragraph:001 Reference ID:64-001-20190722

¹⁰ Page 23, LVIA prepared by Broom Lynne Planning and MS Environmental Ltd

¹¹ Paragraph 1.4, LVIA prepared by Broom Lynne Planning and MS Environmental Ltd

14. The above factors lead me to find that the development would diminish openness at the site, and moreover, this would have a greater impact on openness than the existing situation. Consequently, the proposal would not fall within any of the exceptions listed in the Framework and would constitute inappropriate development in the Green Belt. In addition, the development would encroach into the countryside to a greater extent than at present and would therefore, conflict with one of the five purposes of the Green Belt set out in paragraph 134 of the Framework. However, in view of the limited lifetime of the proposal and the ability to increase planting to reduce its impact in wider views, it would overall, result in moderate harm to openness.

Character and appearance

15. The LVIA demonstrates that the appeal site lies within the Borehamwood Plateau within the Hertfordshire Landscape Character Assessment which is primarily characterised by its gently undulating landform and pasture. Within the vicinity of the appeal site, the predominantly rural character is eroded to an extent by the presence of notable infrastructure including the M1, the Elstree substation, large pylons and power lines. Nevertheless, the surrounding pasture land, established hedgerows and trees and generally limited sporadic clusters of buildings and their associated form, retain a discernible rural character.

16. The appeal site is visually separated from the M1 and Elstree substation by distance and intervening pasture land. Land to the north and east of the site has a rural, open, agricultural character. The site, as part of Hilfield Farm lies adjacent to a collection of buildings and yards of a somewhat utilitarian appearance commensurate with a working rural landscape. My observations of the appeal site revealed that there was some hardstanding and storage of building materials and equipment on part of the site which has a negative visual impact. However, significant parts of the site are devoid of obvious development. The extent and prominence of the mature hedgerow adjacent to Hilfield lane makes a notable positive contribution to the area.

17. The ESS would include battery containers with acoustic fencing, a transformer, a high level disconnecter, switch rooms, CCTV, lighting poles, palisade fencing and access, which in combination, would have an industrial appearance spread across the approximately 4500sqm site area¹² and would necessitate the reduction of existing vegetation within the site. The proposed access would require the removal of part of the existing hedgerow at a publicly prominent point directly adjacent to Hilfield Lane which would allow for views into the site. In combination, these factors would further diminish the prevailing rural character of the area.

18. I acknowledge, based on the verified photography in the LVIA, that the visual harm would be localised as existing vegetation and proposed planting would assist in limiting the wider visual impact of the proposal. Nevertheless, the LVIA concedes that the character of the site itself will change. Moreover, the planting would not entirely overcome the localised harm.

19. Taking these factors together, I find that the proposal would have a limited negative impact on the prevailing rural character and appearance of the area. Although the Council does not cite specific policies of the development plan in

¹² Section 5, Planning application form

its second refusal reason on the decision notice, it does identify relevant policies in its delegated report. Therefore, it would run counter to policy SADM30 of the Hertsmere Local Plan, Site Allocations and Development Management Policies Plan, November 2016 (SADM). This policy in setting out design principles for new development, states amongst other things, that it supports development provided it makes a positive contribution to the built and natural environment. Furthermore, it would conflict with policy CS22 of the Hertsmere Local Plan, Development Plan Document, Core Strategy, January 2013 (CS) which amongst other matters, states that development proposals should take advantage of opportunities to improve the character and quality of an area.

20. I note that the Council's delegated report also refers to policy SADM3 and Part D of the draft Hertsmere Planning and Design Guide, 2016. However, as the former relates to residential development and the latter gives general guidance largely in relation to conventional residential or commercial schemes, I do not find that the proposal would conflict with them.

Other Considerations

21. The appellant refers to national policy objectives to achieve 15% of national energy consumption from renewable sources by 2020, 80% by 2050 and zero carbon emissions by 2050, as well as the report 'Operating the Electricity Transmission Networks in 2020' (June 2011). This outlines how UK electricity generation is moving from a reliance on fossil fuel to a greater reliance on renewable energy, general support for which is found in paragraph 148 of the Framework. As the production of energy from renewable sources is more volatile, ESS's can generally assist in storing surplus electricity at peak times of generation and in providing balancing services to the National Grid to support the security and continuity of electricity supply. Furthermore, in doing so, ESS's are emission free and may involve less infrastructure in comparison to other types of grid balancing services.
22. As such, although the proposal does not have a role in renewable energy generation directly, nor could it be guaranteed to exclusively balance renewable energy as it depends on the UK mix overall, it would indirectly support the increasing reliance of renewable energy as a proportion of that mix.
23. The evidence provided outlines that there are a number of relevant locational and technical constraints for ESS's, including grid connection requirements, the consideration of grid capacity, distance, cost and land availability. As a result, there will be a finite number of suitable opportunities.
24. In support of the proposal the appellant has provided an assessment of how the appeal site was selected¹³ and sets out locational and technical criteria applying them to potential alternative sites through a four stage procedure. However, I have concerns regarding the adequacy of the justification for the first stage which effectively establishes the catchment area for comparative sites. The report states that it covers part of the UK Power Network Distribution Network Operator (DNO) area because it is known to be a constrained network. Nevertheless, it is not explained why it was necessary to limit the area to only

¹³ Grid Connection and Site Review prepared by Origin Power Services, October 2019

- part of the DNO network, which as one of 14 in the country¹⁴ is therefore, likely to relate to a larger area of the country, and potentially cover land that is not in the Green Belt. It follows that there is limited explanation to link the regional and national benefits¹⁵ that the ESS would provide to necessitating development in the specific location of the appeal site.
25. In addition, although the appellant refers to the benefits of the ESS as being significant¹⁶, the submitted information does little to quantify the extent of the service that would be provided to the electricity supply network at regional or national level. Neither is there any reference to what extent, if any, this is already being addressed within the wider DNO. Overall, I am not assured that there are no suitable alternative sites that might deliver similar benefits that would not result in similar harm to the Green Belt. Nevertheless, in view of the general support the proposal would provide to the transition to a low carbon economy, this matter attracts moderate weight.
26. Reference is made to 16 other planning permissions granted by other local planning authorities for ESS development in the Green Belt. Although a summary table is provided, I do not have full details of the plans, officer reports nor all the circumstances put forward to justify the proposals which inhibits a meaningful comparison with the proposal before me. It is evident from the limited descriptions provided that some of the examples relate to considerably smaller scale ESS than the appeal proposal. As I cannot be sure that they represent a direct parallel to the development before me they attract little weight.
27. My attention is drawn to four appeal decisions¹⁷ which the appellant considers provide support for the proposal. However, none of those appeal decisions related to inappropriate development in the Green Belt, and therefore, the Inspectors were applying different policy tests in reaching their overall conclusions. I have noted that in those cases, the benefits of providing ESS was given weight in favour of the proposal, and in this regard, my approach is consistent. However, in relation to the overall balance in each case, the examples are of limited weight as each case needs to be considered on its own merits.
28. The appellant asserts that much of the site could be lawfully used for industrial or storage purposes which could have significant visual impacts on the Green Belt. The CLEUD establishes that part of the appeal site can lawfully be used for the storage of building equipment and materials. However, otherwise I have seen little evidence to substantiate that it would be lawful to use the site on a 'far more intensive basis' such as for the storing of fairground equipment or waste materials¹⁸, nor is there evidence to suggest that this is a realistic prospect.
29. Furthermore, the appellant acknowledges¹⁹ that no planning permission or CLEUD exists for the parking, storage of vehicles, agricultural and other industrial materials for the remainder of the site (referred to as Plot 2 by the

¹⁴ Paragraph 1.2 Grid Connection and Site Review prepared by Origin Power Services, October 2019

¹⁵ Paragraph 7.2.1.3 Appellant's Statement of Case

¹⁶ Paragraph 7.2.1.12 Appellant's appeal statement

¹⁷ Referenced APP/X1545/W/18/3204562, APP/N1730/W/17/3167123, APP/D3830/W/16/3151730 & APP/M2325/W/18/3196360

¹⁸ Paragraph 7.2.1.7 Appellant's Statement of Case

¹⁹ Paragraph 7.2.1.8 Appellant's Statement of Case

appellant). In any event, even if I were to accept the lawfulness of these activities, the limited evidence does not demonstrate that overall they would be less preferable than the appeal proposal in visual terms and therefore, this factor carries little weight in support of the appeal proposal.

30. Although landscaping is a reserved matter, reference is made to the additional planting that would be provided as part of the proposal. It will be seen from my reasoning above that I have already taken account of this in the likely screening and softening of the visual impact of the new development. Such new planting is likely to bring associated ecological benefits. However, as suitable landscaping and ecological mitigation is a normal requirement of development plan policies, it is not shown that there would be a significant benefit arising from the proposal. Therefore, these are neutral factors in the overall Green Belt balance.
31. Similarly, the absence of harm in relation to highway safety or to nearby residents from noise impact²⁰ does not count as a benefit in favour of the proposal.
32. I am mindful that paragraph 147 of the Framework indicates that elements of many renewable energy projects will comprise inappropriate development in the Green Belt and that very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources. However, whilst ESS's contribute towards balancing the grid and mitigating the unpredictable nature of renewable energy supplies, they do not generate energy and are not renewable projects of themselves.

Other Matters

33. Section 66(1) of the Planning (Listed Building and Conservation Areas) Act 1990 requires that, when considering planning proposals, decision makers should have special regard to the desirability of preserving listed buildings or their settings. A Grade II listed barn is, or was, located close to the south east boundary of the site. Based on the list entry information, its significance derives from its age and timber framed construction and therefore, primarily relates to its historic fabric and aesthetic appearance. The appellant points out that the building is no longer in situ due to storm damage, which is consistent with my observations of the site whereby there was no obvious structure present, and any remaining historic fabric at the site was fenced off and beneath tarpaulins.
34. It is therefore uncertain what the future of the heritage asset will be, and whether or when, it will be reinstated. Furthermore, the surroundings within which the asset is experienced include a cluster of buildings with a functional appearance. Notwithstanding that the proposal is made in outline, the LVIA²¹ illustrates that it would be possible to provide a reasonable buffer of woodland planting between the location of the building and the proposed development in order to provide a significant level of screening. Overall, and in the absence of evidence to suggest to the contrary, I have little basis to find that the development would harm the way in which the heritage asset is experienced.

²⁰ Noise Impact Assessment, DB Consultation Ltd, October 2019, Appendix 7 Appellant's Statement of Case

²¹ Page 24

Green Belt balancing exercise

35. Paragraph 144 of the Framework advises that substantial weight should be given to any harm to the Green Belt. Moreover, very special circumstances to allow inappropriate development will not exist unless the harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. In this case, the proposal amounts to inappropriate development, and moderate harm would be caused to the openness of the Green Belt. There would also be limited harm to the character and appearance of the area.
36. Any harm to the Green Belt, attracts substantial weight, and the harm to the character and appearance of the area, although limited, attracts significant weight. Even when taken cumulatively, the other considerations in this case do not attract more than moderate weight overall and therefore, do not clearly outweigh the harm identified. Consequently, the very special circumstances necessary to justify the development do not exist.
37. Accordingly, the proposal would be contrary to the Framework and to policies SP1 and CS13 of the CS which, amongst other matters, seek to protect the Green Belt from inappropriate development.
38. The Council has also referred to policy SP2 of the CS and policies SADM22 and SADM26 of the SADM in their first refusal reason. Policy SP2 sets out a general presumption in favour of sustainable development and does not specifically refer to the Green Belt. As such, I find no specific conflict with it. Policy SADM22 establishes the boundary of the Green Belt within which the provisions of policy CS13 will apply. Policy SADM26 sets out development standards in the Green Belt and therefore, as confirmed in the supporting text²², it is generally aimed at development that is not inappropriate. It follows that these policies are not directly applicable to the circumstances of the appeal proposal and I do not find direct conflict with them.

Conclusion

39. For the reasons given above, I conclude that the appeal should be dismissed.

Helen O'Connor

Inspector

²² Paragraph 4.97

Appendix 7

Relevant Ministerial Statements

Appendix 7: Relevant Ministerial Statements

Greg Barker, Minister for Energy and Climate Change (speech to large scale solar conference 25 April 2013).

“But not at any cost...not in any place...not if it rides roughshod over the views of local communities.

As we take solar to the next level, we must be thoughtful, sensitive to public opinion, and mindful of the wider environmental and visual impacts.”

<https://www.cpreherts.org.uk/wp-content/uploads/sites/30/2021/10/The-Problem-with-Solar-Farms.pdf>

Planning Minister, Nick Boles (House of Commons oral statement 29 January 2014).

“The policies in the National Planning Policy Framework are clear that there is no excuse for putting solar farms in the wrong places. The Framework is clear that applications for renewable energy development, such as solar farms, should be approved only if the impact, including the impact on landscape– the visual and the cumulative impact– is or can be made acceptable. That is a very high test.”

<https://www.cpreherts.org.uk/wp-content/uploads/sites/30/2021/10/The-Problem-with-Solar-Farms.pdf>

<https://www.cpreherts.org.uk/wp-content/uploads/sites/30/2021/10/The-Problem-with-Solar-Farms.pdf>

Eric Pickles, Secretary of State, Communities and Local Government (March 2015)

“Meeting our energy goals should not be used to justify the wrong development in the wrong location and this includes the use of high-quality land. Protecting the global environment is not an excuse to trash the local environment.”

<https://www.cpreherts.org.uk/wp-content/uploads/sites/30/2021/10/The-Problem-with-Solar-Farms.pdf>

Eddie Hughes MP, Ministry of Housing, Communities and Local Government (in a letter dated 2 June 2021 to Kemi Badenoch MP)

“There are strong protections in place within national planning policy which guards against inappropriately sited solar farms... expects local authorities... to take account of the benefits of the best and versatile farmland, to enhance the biodiversity and recognise the character and beauty of the countryside... Where a proposal involves Greenfield land, local councils are expected to consider whether the proposed use of any agricultural land has been shown to be necessary. Where high-quality agricultural land is involved, this would need to be justified by compelling evidence. We have been clear that the need for

renewable energy does not automatically override environmental protections and the planning concerns of local communities, and that views of local communities should be listened to ... Where relevant planning considerations are raised by local residents these must be taken into account by the local council."

<https://www.cpreherts.org.uk/wp-content/uploads/sites/30/2021/10/The-Problem-with-Solar-Farms.pdf>

Liz Truss, as Environment Secretary told the Mail on Sunday on 20 October 2014 that:

"large scale solar farms are 'a blight on the landscape' and confirmed plans to cut a taxpayer subsidy to farmers and landowners for the schemes. She said that "Food and farming is our number-one manufacturing industry, the whole food chain represents £100bn in our economy, and it is a real problem if we are using productive agricultural land for solar farms".

[Solar farms are a blight on the landscape, says minister - BBC News](#)

<https://www.bbc.com/news/uk-29679312>

Liz Truss PM was highly critical of solar farms in her campaign to become the nation's prime minister, joining a chorus of her fellow Conservative MPs who had described solar panels as 'hazards for rural communities and food supply'.

[Liz Truss renews attacks on solar farms, vowing to free fields from 'paraphernalia' | BusinessGreen News](#)

Oliver Dowden MP for Hertsmere also commented on the application, which is now subject to this appeal. In a Statement made on 9th November 2021 he stated as follows:

"As many of you know, I have been taking a close interest in the application to develop a solar farm on land to the northeast and west of Elstree Aerodrome. This decision will be taken by Hertsmere Borough Council on Thursday.

I have been engaging with residents, local councillors, and Hertsmere Borough Council throughout this period. Having considered it in detail, I am very concerned that the size and scale of this application will have a disproportionate impact on our green open spaces.

But I do think it is important that they consider whether this scale of development is appropriate for our local community. I am not convinced that it is and have shared this view with local councillors."

[Oliver's Statement on Solar Farm application | Oliver Dowden](#)

Appendix 8

Aldenham Parish Council Open Spaces Biodiversity Policy

Aldenham Parish Council

Open Spaces Biodiversity Policy



Forward

Aldenham Parish Council (APC) owns or leases over 69 acres of open spaces across the Parish.

Our Open Spaces are very varied and include over 1500 trees , parkland ,open fields, copses ,rivers, ponds and woods.

They front main roads, open fields and residential/ commercial properties.

We are committed as mentioned in the Radlett Neighbourhood Plan (RNP) 2020-2026 to provide public space improvements, Including the provision of community gardens and allotments, enhanced the biodiversity and mitigation of air pollution shall be supported.

This plan should be read alongside management plans for Fir Spring wood, Scrubbitts wood and KGV

The object of this biodiversity action plan is to work towards enhancing and protecting the biodiversity in the Parish Open Spaces.

What is Biodiversity?

The term biodiversity comes from the words biological diversity and quite simply means variety of all living things, including fungi, plants, animals from single- celled organisms to the largest mammals and trees.

Biodiversity also refers to genetic diversity within species (essential for evolution) and also the diversity of the woodlands, wetlands and other habitats which provide the food, water and shelter for these species

Aldenham Parish Council refer to biodiversity as “wildlife “this includes mammals, plants, lichens, and fungi.

The places where wildlife lives such as woods, rivers, lakes, parks recreation grounds and open spaces.

Why is biodiversity important

Biodiversity is vital to life and, in its simplest terms, enables life to exist on earth, it provides the air we breathe, the food we eat, the materials we use and the medicines we take.

These are all linked together in a complex web with every plant and animal having its own small part to play.

APC Open Spaces

That we manage and maintain the grass areas in

- Phillimore Recreation Ground-includes, Children playground
Open field, Wood, Pond, Allotment, Trees, Mixed Hedges, Naturalising Bulbs

- Scrubbitts Wood- includes -Trees, Mixed Hedges, Bluebells
- Tykeside-includes Trees, Shrubs, River
- Radlett Gardens-includes Trees, Shrubs, Hedges
- Letchmore Heath-includes Children playground, Trees, Shrubs, Pond
- King George V Playing Fields- includes Trees, Mixed Hedges, Woodland Dell, Grass Meadow areas and sports fields area for Cricket and Rugby
- Aldenham Green-includes -Trees, Naturalising bulbs._

Who are our partners

- Herts & Middlesex Wildlife Trust
- Local Community/Schools
- Friends of Group
- Green Flag Award Scheme
- HertsmereBC (HBC)
- Radlett Youth Council
- Herts C.C
- Herts Constabulary Safer Neighbourhood Team_

What are the benefits

- Improved open spaces
- Increased educational opportunities through events
- Increased health through walks and volunteering activities
- Greening the Parish through habitat management and creation
- Increased awareness of wildlife and conservation
- Increased populations of endangered species_

What can APC do

Maintain and Manage existing biodiversity in its open spaces

- Carry out wildlife surveys in our Open spaces
- Look to identify new planting areas and create wildlife areas
- Look to increase our tree stock
- Look to restore the pond in Phillimore Recreation ground
- Maintain the pond in Letch more Heath
- Develop local partnerships to help maintain and improve biodiversity
- Whilst carrying out tree works, look to leave wood on site to create good habitat tree log piles
- Identify grass meadow areas
- Raise awareness of biodiversity to the local community
- Create a community orchard on our allotment site
- Give an annual report on our biodiversity actions and improvements to the local community
- Influence HBC draft local plan to ensure creation of more open space in development with increased biodiversity.

Create and maintain existing wildlife rich habitats

APC will look to create habitats that benefit wildlife. There is an existing wildflower garden on the allotments at Phillimore Rec. APC have also started to create wildflower areas on the banks between Phillimore Rec Ground and the allotment drive.

APC will look to create more area that support bees and other wildlife on edges of Phillimore Rec Ground.

In Fir Spring & Scrubbitts Wood any trees that are cut down are left as log piles to encourage wood lice etc.

As part of the management plan native species of bluebells have been planted and scrub reduced in order to allow these plants to survive.

KGV

On Salters Field the grass has been allowed to grow with paths being cut in-between. This has allowed flowers to thrive such as poppies and orchids.

Amenity Grass

There are a number of areas where APC has amenity grass. Whilst there is very little opportunity to enhance these areas with regards to bio-diversity especially on the sports pitches. However, APC will investigate whether sensory gardens could be created in the two children's play areas which will enhance the diversity of what is available in these areas.

Naturalised bulbs in grass

Daffodil bulbs have been planted in Phillimore Rec, Aldenham Green & Letchmore Heath. There are also bulbs planted annually in the Radlett Centre raised beds. These provide a flash of colour in spring. These have medium value of biodiversity providing pollen and nectar early in the season. APC will look to enhance the variety available with say crocuses and snowdrops.

Trees

Trees are of high value to biodiversity due to having a huge range of habitat niches. APC have wooded areas and copses in Fir Spring & Scrubbitts Wood and trees on all other open spaces which total in all some 1500 in number.

Both Fir Spring and Scrubbitts Wood have management plans designed to ensure sustainability of the areas for generations to come. So far, these plans have reduced the dense tree cover to allow new trees to be planted and grow. The scrub has been cut back and will be managed. Pathways have been opened up directing footfall in these areas rather than the whole wood which will again allow young plants to flourish. APC will update these management plans.

On KGV the trustees have commissioned a report to plant trees on Salters and the Picnic Field over a ten-year period, thus planning for the future.

To allow single trees to remain undamaged by strimming etc, a buffer zone of 50cm will be created where the grass will remain uncut. In this area bulbs will be planted to add colour in the spring.

Ponds & Wetlands

Ponds are a great value to biodiversity. APC will look to create a pond in Fir Spring Wood and investigate what can be enhanced at Letchmore Heath, along with a maintenance programme.

Allotments at Phillimore Rec

Where there are unused areas on the allotment's APC will look to plant native fruit trees to increase the visiting pollinators.

Scheduled vegetation, tree and hedge works

All scheduled works on APC land to vegetation (scrub clearance), tree works and hedge trimming will be scheduled outside the bird breeding season from March to September.

Reduce pesticide and herbicide use

APC are committed to not use pesticides and herbicides now, tree stumps previously 'killed off' by insecting pellets in are now ground out below ground level, levelled off and seeded. Any compost purchased will not be 'peat' based.

Remove invasive non-native plants

Fortunately, there are limited occurrences of non-native species on APC land. APC will continue to monitor and remove (using contractors) any non-native species such as Japanese Knotweed and Giant Hogweed.

Communication

It is important that APC use signage, Around Radlett and social media to inform the public where it changes the appearance of a certain area. This includes using expertise at Radlett Horticultural Society and including Friends of Scrubbits Wood in any plan for Scrubbits Wood.

APC will continue to work with Fair Field School on the bio-diversity of the school garden as well as bat boxes, planting and bat walks in Fir Spring Wood.