



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

Hilfield Solar Farm,
Aldenham, Herts.

HCUK Group is a multi-disciplinary environmental practice offering expert advice in archaeology, heritage, landscape, arboriculture, and planning. It began life in 2010 as Heritage Collective LLP, before becoming Heritage Collective UK Limited in 2014. In the coming years diversification saw the addition of Archaeology Collective, Landscape Collective and Planning Collective, before all strands came together to be branded under a single umbrella: HCUK Group, based on the acronym for the original company. A home working company since the beginning, we are pleased to employ a talented workforce of consultants and support staff, who are on hand to advise our clients.



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1. Introduction

- 1.1** My name is Valerie Scott. I am the Principal Planning Consultant of HCUK Group and I am witness for Aldenham Parish Council (APC), who have been granted Rule 6(6) status in this appeal.
- 1.2** A copy of the objection letter by APC is enclosed in **Appendix 1**, and the report by David Lane is enclosed in **Appendix 2**.
- 1.3** In my evidence I address the concerns of APC and refer to the written statements on heritage matters by Dr Jonathan Edis, HCUK Group and on landscape matters by Claire Browne, Landscape Director of the HCUK Group. These statements are included as **Appendices 3 and 4**.

Qualifications and experience

- 1.4** I hold a Bachelor of Science Honours Degree in Geography, a Master's Degree in Civic Design and I am a Member of the Royal Town Planning Institute.
- 1.5** I have over forty five years' experience in planning, twelve of which were for local authorities, including the City of Manchester and the Corporation of the City of London, with the remainder in private practice.

Site visit

- 1.6** I undertook a site visit on 6 July 2022.

2. Site and Surrounding Area

- 2.1** A description of the site is set out in the Draft Statement of Common Ground, on which the comments of APC have been added.

- 2.2** A plan showing the public rights of way (PROWs) which run through or are close to the site and the siting of the heritage assets in close proximity to the site is enclosed at **Appendix 5**.

3. Planning History

- 3.1** The planning history relating to the Appeal Site is set out in the Draft Statement of Common Ground. Of particular relevance is the application for outline planning permission for the development of an energy storage system. (Application Ref: 18/1587/OUT). The site was a small compound on land adjacent to Hilfield Farm. A copy of the Site Location Plan is enclosed at **Appendix 6**.
- 3.2** The application was refused planning permission on 28th May 2019 and dismissed on 23rd March 2020. (Ref: APP/N1920/W/19/3240825). (**Appendix 6**).
- 3.3** There are many similarities between this appeal and that currently under consideration.

4. Proposed development

- 4.1** The application which is subject to this appeal is described in the Draft Statement of Common Ground.

5. Policy Context

- 5.1** I refer to the chapter headed 'Planning Policy' in the Draft Statement of Common Ground and agree that the policies, documents and guidance notes listed are relevant to this appeal, subject to the inclusion of the Government's Ten Point Plan for a Green Industrial Revolution, November 2020.

Ministerial Statements

- 5.2** I also refer to relevant ministerial statements, which are set out in **Appendix 7**.

6. Reasons for refusal

Inappropriate development in the Green Belt

- 6.1** It has been agreed by all parties that the proposed development is 'inappropriate development' in the Green Belt and that inappropriate development is, by definition harmful to the Green Belt and should not be approved except in very special circumstances. (NPPF paragraph 147).

Harmful effect on the purposes of the Green Belt

- 6.2** The proposed development covers an area of approximately 130 hectares. It is the sheer size and extent of the development proposed, which is the main concern.
- 6.3** The appeal site is within an area of considerably high value in terms of its attractive open countryside setting, the value of this countryside to the local community in terms of their enjoyment of the countryside, and the value of this countryside in an area so close to the Metropolitan Urban Area. This is an area which is of extreme importance in terms of preventing urban sprawl and enabling people both living in this area and in the more densely populated areas around the site to be able to access and enjoy the open countryside.

Impact on the character of the landscape

- 6.4** The Appellant's Landscape Consultants, LDA Design have prepared a Landscape and Visual Assessment (LVIA) demonstrating that the proposed development will have large adverse effects in the medium term (2-10 years) and medium adverse or large/medium adverse effects in the long term (10-25 years).
- 6.5** Claire Browne, Landscape Director of HCUK Group has reviewed the LVIA and her Landscape Statement is enclosed in **Appendix 4**.
- 6.6** Ms Browne refers to the long-term adverse effects on the visual characteristics of the landscape which will extend across large tracts of countryside between Borehamwood, Bushey and Radlett. She states that 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 cases locations will impact on ridgelines.

6.7 Another key consideration is the public enjoyment of the Green Belt countryside, where the perceived sense of openness is intrinsic to the experience. The introduction of solar panels particularly on both sides of a footpath route, can channelise views and erode the perceived sense of openness.

6.8 The findings of LVIA are a large scale of changes resulting in significant effects (Major-Moderate and Adverse). Significant adverse visual effects will continue to remain for users of the site in the long-term for a semi-permanent duration.

Impact on public rights of way

6.9 The site is crossed by a high number of PROWs, providing a valuable recreational asset and linking with important environmental and heritage assets. There would be significant adverse effects arising from the change of short and long-distance views of undeveloped open countryside to views of industrial built development. Fencing along the footpaths, often on both sides, would give the feeling of being contained, reducing enjoyment and deterring users.

6.10 Given the location of the site so close to the urban settlements these PROWs can be expected to offer a valuable recreational asset to their populations, which in turn is beneficial to the tourism economy of the local area.

Impact on the rural economy

6.11 The agricultural land has been classified as grade 3b (moderate quality). This is a valuable resource, particularly in Hertsmere Borough where most of the land is not of high grade and this land is already capable of producing good yields of cereals and grass.

6.12 The Government have also stressed the need for the UK to be self-supportive in terms of food production and the loss of this amount of land for arable food production is a concern particularly with the current food shortages at this time.

Impact on long term character of the area

6.13 There is no guarantee that the site will be decommissioned at the end of the initial 35 year operational phase. An application could be made towards the end of this

period to continue the use as a solar farm with new equipment and after such a long period there would be strong case to allow other types of built development.

Impact on wildlife

- 6.14** The proposed development does include some benefits in terms of biodiversity. However, I question the impact of having so many fields surrounded by wire fences in terms of the impact on larger mammals such as foxes and muntjac deer whose ability to roam will be significantly affected. The proposed development is likely to have a negative impact on larger mammals.

Impact of noise

- 6.15** The proposed substation, cooling units and fans above battery storage units emit a large amount of noise and the inverter/transformer stations distributed around the fields do not seem to be designed to prevent noise emissions. Noise emissions would not only be harmful to occupiers of residential properties it would also have a harmful effect on people using the PROWs which pass through the site.

Impact on flooding

- 6.16** The Lead Local Flood Authority has advised 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. There is clearly a lack of information provided in respect of this matter and the Appellant should deal with the points the Sustainable Drainage Officer has made, to enable a proper assessment.

Lack of consideration of alternative sites

- 6.17** The Alternative Site Assessment prepared by Aardvark is wholly inadequate. No evidence has been provided to demonstrate why the development could not have been linked to a National Grid substations elsewhere in the UK, which is not within the Green Belt. There is also no evidence to demonstrate why a much smaller solar farm, which would have less impact on the openness of the Green Belt, would cause less harm to an area of attractive open countryside of so much value to the local community and to others living nearby has not been considered.

Limited public benefits

- 6.18** The Appellant has put forward various proposed 'public benefits' to outweigh the harm caused to the loss of openness of the Green Belt:
- Generation of renewable energy to support the UK's transition to a low carbon economy;
 - Provision of landscape enhancements;
 - Provision of biodiversity and ecological enhancements;
 - Provision of two new permissive public rights of way;
 - Economic benefits of construction and business rates;
 - Provision of an Educational Strategy for the benefit of local people and school pupils;
 - Improvements to soil and agricultural land quality; and
 - Aiding farm diversification objectives.
- 6.19** Many of the above matters cannot be regarded as benefits at all and certainly not benefits to the local community. The benefits would in any case be minimal and would not amount to 'very special circumstances' to outweigh the harm to the Green Belt.
- 6.20** As such the proposal would be contrary to paragraphs 147 and 148 of the NPPF.
- 6.21** In terms of the matters raised above the proposed development is also contrary to further additional policies of Local Plan: Core Strategy Policies SP1, SP2, CS12, CS13, CS15, CS16, CS17 and CS22 and the Site Allocations and Development Management Policies SADM11, SADM13, SADM14, SADM16, SADM20, SADM26 and SADM30.

Impact on heritage assets

- 6.22** The Council's second reason for the refusal of planning permission alleges less than substantial harm to five designated heritage assets, namely Slade's Farmhouse (listed building, grade II), Hilfield Castle (listed building, grade II*), Hilfield Lodge (listed building, grade II), Aldenham House Registered Park and Garden (grade II) and Penne's Place (Ancient Monument).

- 6.23** Dr Jonathan Edis, Heritage Director of HCUK Group has provided a Heritage Statement on behalf of APC in relation to the impact of the proposed development on these heritage assets and this is attached as **Appendix 3**.
- 6.24** Dr Edis highlights the fact that the Hilfield Castle Group, which also includes the Hilfield Castle Gatehouse, is of particular heritage significance, set in a commanding position to see over the extensive lawns of a country estate. The solar farm will be placed over much of the north-western part of the former Hilfield Castle estate, and it will cover the front parts of the Front Lawn and Western Lawn, wrapping around the northern and western sides of the 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 to which great weight must be given in the balancing exercise.
- 6.25** Slade's Farmhouse retains some of its agricultural setting, within a medieval and post-medieval field system. Slade's Farmhouse would lose another part of its agricultural setting as 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 the consequential change in the road system here. The development would cause less than substantial harm to the significance of Slade's Farmhouse.
- 6.26** 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.
- 6.27** Although Penne's Place was cited in the council's reasons for refusal of planning permission, Dr Edis has been unable to observe any effects that might materially reduce its significance.
- 6.28** The less than substantial harm to the significance of several heritage assets including a medium level of less than substantial scale to a Grade II* listed building engages paragraphs 200 and 202 of the NPPF.

6.29 Paragraph 200 of the NPPF points in the direction of harm to grade II* listed buildings being a potentially weighty matter in the balancing exercise.

6.30 NPPF paragraph 202 states:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing optimal use.”

6.31 The Appellant has not cited any additional public benefits to weigh against the harm to these heritage assets, above those set out to outweigh the harm caused to the loss of openness of the Green Belt. The public benefits to weigh against the harm to these heritage assets falls considerably short of those required to outweigh this harm.

6.32 In relation to heritage matters the proposed development would be in conflict with Core Strategy Policies SP1, SP2, CS14 and CS22 as well as the Site Allocations and Development Management Policies SADM29 and SADM30.

7. Conditions

7.1 APC generally support the proposed conditions set out in the Council’s delegated report. However, Condition 2 which stated that after 35 years “the land shall revert to its former agricultural condition” is to some extent at odds with Condition 3 which requires that *“the land is to be returned to its former condition in a way that would avoid disturbing the biodiversity within the site”*.

7.2 A large part of the site is shown to be used for uses which would enhance biodiversity such as orchards, grassland, parkland and sites for the planting of wildflowers. These areas of land could not be returned to agricultural use without disturbing their biodiversity.

7.3 The condition relating to noise is questioned. There is likely to be noise from the proposed substation, the cooling units and fans above the battery stores. There is

also likely to be noise from the inverter transformer stations distributed around the fields. The potential levels of noise in relation to this proposal are not clear and a much stronger condition to prevent any audible noise is required.

8. Conclusions

- 8.1** The proposed development is inappropriate development within the Green Belt and by definition will result in harm to the Green Belt and to the purposes of the Green Belt, which include the need to prevent unrestricted urban sprawl and to assist in safeguarding countryside encroachment.
- 8.2** I consider that the proposed development will have an extremely harmful impact on the attractive open character of the area. It will also cause visual harm to the character and appearance of the area and to the users of the PROWs that cross this site.
- 8.3** The proposed development would also result in harm to the historic character and setting of important heritage assets, in particular the setting of Slade's Farmhouse (listed grade II) and Hilfield Castle (listed grade II*).
- 8.4** The proposed development would result in the loss of many fields used for arable farming and consequent harm to the rural economy of the area.
- 8.5** There is no evidence provided to suggest that there are no other sites available, that adjoin or are close to National Grid substations, and which would not result in the amount of substantial harm caused by this development.
- 8.6** The Appellant has not demonstrated the 'very special circumstances' which would be required to overcome the harm to the Green Belt or sufficient public benefits which would outweigh the less that substantial harm to the significance of heritage assets, including a very important Grade II* listed building.

9. Declaration of evidence

- 9.1** The evidence which I have prepared and provided for in respect of this appeal (Reference APP/N1920/W/22/3295268) and as set out in this proof of evidence is true and has been prepared and is given in accordance with the guidance of my professional institution, the Royal Town Planning Institute. I confirm that the opinions expressed are my true and professional opinions.