Landscape and Arboricultural Advice

Reference: 3/24/2245/FUL
Site address: Land to The West Of The A507 Between Cottered And Cromer Hertfordshire SG9 9PU
Date of response: 25/02/2025

Recommendations:

☒ Objection
☐ No objection
☐ Further information and/or amendments required

Proposals:

Installation and operation of a solar farm including co-located energy storage facilities, onsite substation, ancillary infrastructure and landscaping

Observations:

Landscape + Visual Impact Assessment

1. **Approach**

1.1 A landscape and visual impact assessment has been submitted, 'Landscape and Visual Impact Assessment,' NI 2747, 02, October 2024, rpsgroup (LVIA) and references the relevant industry guidelines *'Guidelines for Landscape and Visual Impact Assessment, Third edition, Landscape Institute and Institute of Environmental Management & Assessment'* (GLVIA3).

1.2 The LVIA considers that effects of moderate or below are not significant. This approach is not supported, based on experience of good practice, effects of moderate and above should be considered significant.

1.3 Effects on landscape character areas (national and local) have been assessed, however the effects on '*individual landscape features and elements*' (as referenced in the assessment methodology) have not been assessed.

This would address features such as the landform, existing watercourses, and vegetation etc. – see further comments.

1.4 The effects on the site and its immediate setting have not been assessed. This level of assessment is often included in LVIA as it provides a more localised assessment than the broader landscape character area(s) – see further comments.

1.5 It is understood that the viewpoints were agreed with the LPA however a key visual receptor restricted byway (Cottered 006), that runs broadly between Cottered and Rushden to the east of the site, has been missed. (It is noted that Figure 3 'Landscape Designations' does not show all of the public rights of way within the study area, including Cottered 006). – see further comments.

1.6 The methodology (Table 4) sets out a hierarchy of the value attached to views between 'little or no tolerance to change' and 'high tolerance to change' etc. However, the assessment itself uses a different scale of high/medium/low, making it difficult to interpret. (The definitions of 'susceptibility' and 'value' also appear to be the wrong way round).

1.7 Photomontages for viewpoints 15, 16, 17, and 18 are missing from the submission.

2. Landscape Baseline

2.1 With regards to the landscape character area (Upper Beane Valley Tributaries) the LVIA judges' landscape susceptibility as 'medium,' value as 'low,' and overall sensitivity as 'medium.' The judgements for susceptibility and value are challenged, and should be higher, resulting in an overall higher sensitivity, for the reasons as discussed below.

Susceptibility

2.2 There is no reference to the sloping landform or perception of openness. The '*East Herts Landscape Character Assessment, 2007*' (LCA) recognises the

'Bowl like landform comprising steeply sloping chalk valley sides incised by a network of watercourses' as a key characteristic of the area and describes '*expansive open areas of arable farmland*.' With particular reference to the site, this area is identified as 20th century 'prairie' fields where there is little pasture or woodland, due to the long-term use of the area for arable cultivation.

2.3 On visiting site, it is apparent that the characteristics and qualities identified in the LCA (above) are strongly represented within the site and its setting. The sloping nature of the landscape and its openness, with a lack of existing field boundaries and woodland as opportunities for instant mitigation, makes the landscape more highly susceptible to this type of proposed development.

Value

2.4 There should be deeper consideration for the value of the landscape.[1]

2.5 The LVIA methodology for assessing value places great weight on the designated status of a landscape and appears to set out that only internationally, nationally, or regionally or designated/valued landscapes can be considered high or very high. This approach is challenged. GLVIA3 recognises that landscape value is not always signified by designation, and should be determined through a review of existing polices, strategies and guidelines etc. Furthermore, the Landscape Institute Technical Guidance Note '*Assessing landscape value outside national designations'* sets out a range of factors that should be considered when identifying landscape value. These include natural and cultural heritage, landscape condition, associations, distinctiveness, recreational, perceptual (scenic/wildness/tranquillity), and functional factors.

2.6 The site lies within the *'Buntingford Community Area Neighbourhood Plan 2014-2031'* (BCANP) area. Within the BCANP there is repeated reference to importance of the landscape for the preservation of the green gaps of open

[1] the relative value or importance attached to a different landscape by society on account of their landscape qualities

farmland and woodland between town, villages, and adjacent settlement. In addition, of relevance to the proposed development, the BCANP aims include to make the most of the rural aspect by protecting views, ensuring communities continue to be distinctive where identity and heritage are valued, protected and promoted, preserve balance between natural assets and human development, ensure that, as far as possible, the villages continue to be surrounded by productive green environments maintain a sense of place and local character in a high quality environment, protecting their cultural and historical heritage, ensuring that access, outlooks and breathing space are preserved.

2.7 From the above, it is clear that the local community places great weight on the role of the local landscape in providing green open space between settlements. That, and the presence of other indicators of value such as good landscape condition, good accessibility for recreation, the presence of a community bench to take advantage of views, the presence of the historic Cromer Windmill and its association with the arable landscape, the public footpaths as an extension of the Roman Road that runs from Hare Street (and to a lesser extent the small area of open access land and the Grade II* registered Garden) all combine to give this landscape a higher value.

3. Landscape Effects

Landscape character area

3.1 With regards to the landscape character area (Upper Beane Valley Tributaries) the LVIA concludes that the significance of effects at operation are 'moderate' in the medium term, becoming 'minor' in the long term once the mitigation planting has established. This conclusion is challenged, beyond the establishment of the mitigation planting, residual effects will be higher, for the reasons as discussed below.

3.2 At 49.9 MW and occupying 79.5 hectares the scheme represents a sizeable proposal for this type of development. Indeed, it accounts for a relatively large percentage of the landscape character area.

3.3 There is concern for the large scale of the development that would replace a substantial area of green open space with utilitarian industrial/technical development, swaying the balance between open landscape and built development, and resulting in the coalescence of built development between the settlements of Cottered, Hare Street, Cromer, and Cumberlow Green. (contrary to the aims of the BCANP).

3.4 The site boundary lacks cohesion, with an awkward projection or 'annex' in the southwest corner that feels fragmented from the main body of the site and encroaches towards Cromer.

Site level

3.5 There is concern that the identification of the site area is not landscape led and has not been informed by the landform topography. The site boundary feels contrived and does not respond to the contours, indeed the development cuts across the sloping sides of two distinct river valleys and the ridgeline that separates them, contained by highways to the east and west.

3.6 The LVIA does not provide an assessment of the impact upon the river Beane and the tributary that both run through the site, it appears that both waterways will need to be bridged.

4. Visual Baseline

4.1 Focusing on views from within East Herts district boundary, the most highly sensitive views are from three key areas. Firstly, the public rights of way to the south of the site (Cottered 026 and Arderley 049) that run broadly between Cottered and Cromer. Secondly views from the public right of way to the east (Cottered 006) that runs broadly between Cottered and Rushden (not assessed within the LVIA). Lastly views from the public right of way (Cottered 028) that crosses through the site (not assessed within the LVIA).

4.2 The LVIA identifies viewpoint 08 as representative of views from along Cottered 026 and concludes that susceptibility is 'low tolerance to change' and value is 'medium' resulting in an overall sensitivity of 'medium.' This

conclusion is challenged, and the value and overall sensitivity should be higher, for the reason as discussed below.

4.3 In assessing the value attached to the viewpoint 08, the LVIA states that this is not a recognised stopping place, however there is a bench located here to take advantage of the view indicating higher value. In addition, there is concern that the representative viewpoint does not identify that, moving westwards, there is a constant view of the historic Cromer Windmill within the context of the wider arable valley landscape (within which the site is located), again this cultural factor is an indicator of higher value. The LCA recognises that *'Cromer Windmill just outside the Character Area to the southwest is a prominent landmark.'*

5. Visual Effects

Views from the south - Cottered 026 / Viewpoint 08

5.1 The LVIA concludes that the significance of visual effects at operation would be 'moderate' on completion and remain 'moderate' on establishment of the mitigation planting. This conclusion is challenged, and should be higher, for the reason as discussed below.

5.2 It is noted that the viewpoint location does not represent the 'worst case scenario' views from Cottered 026. It is an oblique view and benefits from some partial screening by existing vegetation just south of Lodge Hill farm. Travelling along the majority of Cottered 026, parallel to the southern development site boundary, there are continuous more open views into the site as it cascades down the south facing valley slopes.

5.3 The LVIA concludes that the significance of visual effects at operation would be 'moderate' and the proposal would only represent a minor alteration to the existing character and composition of the view. This conclusion is not supported, and the significance of effect should be higher. This is based on a higher value and overall sensitivity (as discussed under visual baseline above). It is also felt that the magnitude of change within this view is greater, the large scale and industrial nature of the scheme occupies a large portion within the view of this otherwise sparsely settled arable landscape in the

setting of Cromer Windmill. Due to the orientation of the scheme across the south facing slopes, it is difficult to understand how these views could be mitigated.

5.4 It is noted that the solar arrays are orientated to face southwards towards the footpath. There is concern for the potential impact of glint and glare – this receptor has not been addressed in the submitted Glint and Glare study.

5.5 There is concern that due to its elevated location on the ridgeline, the proposed substation compound would be highly visible from here.

Views from the east - Cottered 006

5.6 This receptor has not been assessed. Looking westwards from the route there are oblique views of the development across the sloping valley side. It is likely that the magnitude of change would be similar to that experienced at VP07 – however this would need to be formerly assessed.

Views from the highways to the east– A507 / Viewpoints 04, 05

5.7 The LVIA concludes that for these viewpoints the significance of visual effects at operation would be 'moderate to major' on completion, becoming 'moderate' on establishment of the mitigation planting. These conclusions are broadly supported, however there is concern for the effectiveness of the proposed mitigation as discussed further below.

5.8 The nature of views will change from open views of the landscape to views enclosed by the solar array and mounding, and eventually a degree of screening will be provided by the planting once it has established.

5.9 Within these views, as illustrated on the photomontages for VP 04 and 05, there is concern that the due to the sloping nature of the landscape the proposed mitigation mounding/planting along the site boundary will only provide partial screening in the foreground of views, and the solar array will remain visible across the rising slopes in the mid to background.

Views from the road to the west - Cromer Heath Road / Viewpoints 14, 15, 16

5.10 Photomontages for viewpoints 15 and 16 are missing from the submission, however, are assessed to give rise to the same sensitivity and significance of effects as viewpoints 04 and 05.

Views from within the site – Cottered 028

5.11 This receptor has not been assessed. It is proposed to enclose the footpath with hedgerow and tree planting. Views will substantially change from open long-distance views of the surrounding landscape to views contained within the corridor of the route by the solar array, and eventually by the planting once it has established.

6. Mitigation + Enhancement Measures

6.1 Due to the orientation of the development across the series of valley slopes and ridgeline, mitigation planting along the site boundaries would only provide partial screening to the foreground views and the solar array would remain visible across the rising slopes in the mid – background. It is difficult to understand how any additional mitigation planting could be accommodated elsewhere within the site without affecting the solar panels efficiency.

6.2 It is proposed to introduce mitigation mounds along the eastern site boundary with the A507, and 1.5-2m high mounds are shown on the landscape mitigation plans. It is not clear where the material for the mounds will come from. These are contrived features and do not reflect local character.

6.3 It is proposed to plant the mounds, including specimen trees, however this type and size of planting will not establish well on made up ground. It is also noted that on decommissioning the removal of the bunds would also require the removal of the planting.

6.4 The proposed woodland amounts to a very narrow thin strip of hedgerow and tree planting upon the mound along the eastern site boundary with the

A507 and three small copses within the southwest corner of the site. This is not considered to have the character or function of a true woodland block.

6.5 It is proposed to plant wildflower grassland alongside the river Beane and there are no enhancements shown alongside the tributary (is this a permanent water feature?).

6.6 The proposed substation compound appears to be located in one of the most elevated and visible parts of the site, atop the ridgeline and doesn't benefit from any landscaping.

7. Management Plan

7.1 The proposal refers to the use of sheep grazing to manage the grassland. Within this predominantly arable landscape there is concern for how this would be managed. There needs to be a clear understanding of the infrastructure and ancillary development that would be required and would need to be decommissioned at the end of the development.

7.2 In addition, there would need to be consideration for how the sheep access the different parcels of the site that are fenced from each other, and how the differing management needs of the wildflower areas below the pylons and the general grassland areas would be achieved, indeed would they need to be fenced off.

8. Summary + Conclusion

8.1 The site boundary and development layout are not landscape led and have not been informed by the landform topography or other natural features. Instead, the site cuts across the distinct valley slopes and waterways of the river Beane and the tributary and the ridgeline that separates them, with an awkward projection or 'annex' in the southwest corner.

8.2 The substation compound appears to be located in one of the most elevated and visible parts of the site and visible (especially in views from the south).

8.3 The higher sensitivity (susceptibility + value) of the landscape has not been fully recognised for the reasons as discussed in detail above, including the sloping landform and sense of openness, and the role the site plays in providing a green open setting to the local settlements.

8.4 Overall, the proposed development is considered to have a significant adverse landscape effect due to the magnitude of change and the sway in the balance between open landscape and built development. In addition, the landscape mitigation measures are not deemed sufficient in terms of the response to local character, landform topography, and conserving and enhancing the waterways that cross the site.

8.5 The higher sensitivity (susceptibility + value) of views from the east and south has not been fully recognised for the reasons as discussed in detail above. In views from the south there should be particular consideration for the setting of Cromer Windmill.

8.6 Overall, the proposed development is considered to have a significant adverse visual effect. There is concern that due to the elevated and sloping nature of the site, boundary planting only provides partial screening to the foreground, and the array remains visible in the mid-background.

8.7 It is appreciated that the proposed development is 'temporary,' however its duration of 40 years is considered a substantial portion of a generations experience.

8.8 In conclusion, the proposals are not landscape-led and give rise to significant adverse landscape and visual effects. The proposed landscape scheme is not deemed sufficient to deliver the most effective landscape or visual mitigation, or enhancement of the watercourses, for the duration of the development or beyond.