## LOSF-001. Written Representation Objection on behalf of Frederick George Bentley 17August 2022.

## 1.My Properties Current Position

- 1.1 My property is located on the Waltham Road . It is a very pleasant open setting and I get great enjoyment from my home and garden.
- 1.2 The rear aspect of the property enjoys panoramic views across agricultural fields, Stocks Farm to its left and Porters and Toppinhoehall Woods can be seen to the right .There is an open post and rail style boundary fence which is 1.5m high. The majority of mature tress around mine and neighbouring properties are deciduous. I have attached photographic images of the views from my rear garden boundary fence in Appendix 1.
- 1.3 Due to my properties elevated position ,there is currently very limited obstruction to this panoramic open outlook from the rear aspect of my property .
- This view can be seen from my garden and the properties primary habitable rooms, namely the living/dining conservatory on the ground floor and two bedrooms on the upper floor, which provide extensive views across the agricultural and woodland landscape, both close and far distant.

## 2.Impact of Longfield Solar Farm Scheme Proposals on my property

- 2.1 The Planning Application for the proposed Longfield Solar Farm Scheme will have a great impact on my health and the amenity of my home and will result in significant adverse short- and long-term change.
- 2.2 It is proposed that this same agricultural land at the rear of my home, be included within the Order Limits of the proposed Longfield Solar Farm scheme project. This land is intended to be converted to a PV array field. The Order Limits extend to my boundary fence, see Land Plans Document ref
- 2.3 Appendix 2 attached, details the intended Scheme plan around my property. It clearly shows the Order Limit meeting my boundary fence and the proposed set aside/buffer zone and PV array field and its boundary fence.
- 2.4 The Applicant has not specified within their Design Statement Document ref EN010118/APP/7.3 what the distance will be, of the intended set aside /buffer zone, and my properties boundary fence and the PV array field wire boundary fence.
- 2.5 The Applicants project team did indicate to me, that the proposed set aside /buffer zone would be 50 m, and that was the limit of their authority on that matter. However, no specifics on this have been included in their Design Statement and that is a concern to me.
- 2.6 My properties existing post and rail boundary fence (the extent of the Order Limit) is 1metre high. The proposed new wire fence representing the boundary, of the proposed PV array field, will be 1.5metres high The PV array panels are 3.5 meters high. The Applicant has not specified any alternative panel height, where the PV array field is in closer proximity to nearby residential properties in particular my own home.
- 2.7 The Applicant recognises that the proposal will have a major impact on the landscape and visual impact on this countryside. This is detailed in the Consultation booklet .It states in Para 6.5.4 " to meet the current and future need identified it is likely to have some negative effects on the landscape and visual amenity "
- 2.8 Within the Applicants Document Ref EN010118/APP 6.2 Glint and Glare Assessment 10G table 6.1 Impact on Residential Receptors , it indicates that at my property there is a HIGH glare impact. This is estimated to be on average 88.87 hours glare impact per annum.
- 2.9 The applicant has proposed that "shrub planting" in the set-aside/buffer zone, together with hedging at the 1.5 m PVA field boundary fence will provide adequate screening, between the proposed scheme and residential properties .

- 2.10 The Applicant has stated that it will be a number of years before the proposed planting would have established and would be in leaf to reduce the perception of the new infrastructure. I have read from other responses to this Application that it could be up to 15 years before planting will be in leaf.
- 2.11 The PV array field is too close to my property, and it will badly affect my health, the amenity and enjoyment of my home. The proposed separation distance and screening mitigation measures are inadequate. Up to a 15 year wait for these measures to have established, cannot be considered an adequate mitigation measure.
- 2.12 There will be a high degree of adverse change which will affect my property throughout the 3 proposed phases of the Longfield Solar Farm Project, during construction, operation, and decommissioning, over a 45-year period. In summary
  - Construction Phase -Close range views and noise related to the construction activity including vibration, stored equipment buildings, heavy plant and general vehicle and pedestrian movement, solar panel erection, security lighting and fencing installation. The landscape will gradually change, and the developing solar farm will become a dominant feature.
  - Operational Phase- Due to the close-range and distant views of the proposed development scheme, the character of my outlook and views from my property will radically change. There will be an extensive field of 3.5m PV array panels, producing "glint and glare" impacts .Due to the openness of my property's location, there is little natural or manmade obstacles to prevent both a sense of place loss and glint and glare effects.
  - Decommissioning Phase-Close range views and noise related to the decommissioning activity, stored equipment buildings, heavy plant and vehicle and pedestrian movement, solar panel dismantling and fencing removal

# 3.My Objections to Longfield Solar Farm Scheme Proposals

- 3.1 My health and my properties amenity and views will be very negatively affected by these proposals. The impact of these proposals on me and my property will be major, and I strongly object to the Applicants assessment contained within the Planning Statement Document Ref ENO10118/APP/7.2-page 74 point 6.6.24, where the Applicant concludes "that two non-designated heritage assets including No 1 Stocks Cottages will experience minor effects as a result of the proposed scheme"
- 3.2 Due to my properties close proximity to this proposed scheme, I have two main objections .Firstly, the impact on my health and quality of life affected by the significant change due to the "glint and glare" from the PV array field and secondly to the loss of visual character of my outlook and how these impact on the amenity of my home.
- 3.3 The proposed Longfield Solar Farm PVA array field is too close to my property .As a result, it will be too prominent, unavoidable, and visually dominant. My quality of life will change as the scheme affects my living conditions for the whole of this proposed project 45-year life, severely impacting on my property's amenity.
- 3.4 There will be a complete landscape character change at the rear of my property, where my primary accommodation is situated. Seasonal colours of arable farmland will be replaced with grey/black 3.5m high PVA panel structure as far as the eye can see.
- 3.5 What is proposed is contrary to the Design Principles of the National Infrastructure Commission . I will experience adverse visual and perceptual effects of various elements of the solar farm phased construction, operation, and decommissioning activity, as part of my daily routine. The visual elements include not only the panels themselves , but also the general security infrastructure such as fencing and lighting, In its entirety the scheme is likely to adversely affect my quality of life.
- 3.6 The overall proposed measures to mitigate the impact of this proposed development on my property, during the three phases of activity as detailed by the Applicant, are very limited, insufficient, and unacceptable to me,

given the harm they would cause to my health and the amenity of property if Development Consent were to be provided.

- 3.7 The proposed mitigation measures between my properties boundary and the proposed Scheme PV array field ,do not accord with at paragraph 2.51.2 of the draft National Policy Statement for Renewable Energy Infrastructure (EN3)10, where mitigation should seek to retain the character of the landscape and, ideally, reduce the visual effects to zero, where possible, as suggested, especially for visual receptors, at the edges of settlements.
- 3.8 The proposed scheme development, will cause harm to the context and setting of local heritage assets and this planning application is contrary to NPPF Chapter 16 conserving and enhancing the historic environment.
- 3.9 I note in the Applicants Comments on Relevant Representations dated August 2022 page 74 that they feel an independent Residential Visual Amenity Assessment (RVAA) "is not required. This was agreed via email dated 15 October 2021 by the host authorities' advisers on this matter"
- 3.10 There are 51 properties of which 32 are Designated Heritage Assets and 19 Non-Designated Heritage Assets, including my own, which will be visually affected by this project. Given the scale and potential impact of these proposals, I feel it is essential that an Independent and impartial Residential Visual Amenity Assessment (RVAA) should have been submitted as part of this application.
- 3.11 This is a Nationally Significant Infrastructure Project .It is inconceivable that the Applicants employees or retained fee paid contractors, can write, and submit a Landscape and Visual Amenity report, which by its nature will undoubtedly be weighted in favour of the Applicant.
- 3.12 The Schemes proposal documentation has indicated that there will a "HIGH" Glare impact at my property. The proposed PV panel height is 3.5 m .There is no indication within the proposal of any differing panel height near my property. Consequently, "glint and glare" will have a very negative impact on my health , quality of life and the amenity of my home.
- 3.13 There will be a continuous source of bright light -glare, emanating from the PV panels, due to their 3.5m height .They will be highly visible from my garden and ground floor living/dining conservatory, and more clearly from two upper floor, habitable rooms.
- As I have stated the proposed scheme will be so visibly dominant at the rear of my property it will be unavoidable. There are no manmade or natural obstructions that will prevent this glare impacting on both my health and the amenity of my home .
- 3.14 The Applicant has identified that my property will be subject to 88.87 hrs annually of glare . Pager Power is a recognised expert consultancy, having completed over 220 Glint and Glare Assessments . Their guidance on such matters indicates that this amount of annual glare impact (88.87 hrs pa) , should be considered "significant with respect to residential amenity . In this scenario, mitigation should be implemented"

  The mitigation measures proposed around my property in the set aside/ buffer zone , are totally inadequate and will not prevent the harm this development presents to both my health and the amenity of my home.
- 3.15 The only mitigation measures proposed by the Applicant is to screen the PV field of 3.5m high PV panels near my boundary is to plant a mixed hedge in front of a proposed 1.5 m high fence together with low level scrub planting in the set aside /buffer zone. The Applicant has already indicated it will be take up to 15 years before mitigation planting will be mature enough reduce the perception of the infrastructure. This is inadequate and unacceptable to me.

## 4. What I would like the Planning Inspectorate and Secretary of State to consider

4.1 The proposed Longfield Solar Farm PV array field is too close to my property; the mitigations measures are totally inadequate. As a result, the scheme will be too prominent, unavoidable, and visually dominant. My health and quality of life will change as the scheme affects my living conditions for the whole of this proposed Schemes 45-year life, severely impacting on my property's amenity.

- 4.2 The Planning Inspectorate initiate an Independent Residential Visual Amenity Assessment (RVAA) as soon as possible and share those findings with Interested Parties to inform this process. The Independent RVAA will ensure there is an objective and impartial assessment available to the Planning Inspectorate and SoS , that highlights and validates the impact of these proposals on those residential properties affected by it. This would provide an independently assessed, realistic base, on which the Planning Inspectorate and SoS could determine, if the mitigation activities proposed by the Applicant, are robust and the most suitable, to best protect the amenity, of each of those properties that are visually affected by the proposed project scheme, including my own.
- 4.3 I would like the Planning Inspectorate to advise the SoS not to provide consent and not to approve this application due to the high number of contraventions to National Planning Policy and the substantial harm it will bring to my health, the amenity of my property and enjoyment of my home.
- 4.4 Should for whatever reason the Planning Inspectorate recommend Development Consent for this application and the SOS is minded to approve it , I would like the following "planning conditions" below to be considered by the Inspectorate and apply them as part of any Development Consent:
  - 1. The set aside/buffer zone around my property is set back further than is currently proposed .See my proposal in Appendix 3, this will reduce the schemes negative impacts on my health and amenity of my home.
  - 2. The mitigation measures to screen the scheme infrastructure (PV array field), through all the three phases of activity, are robust and effective. Any mitigation planting throughout my proposed extended set aside/buffer zone is to be of sufficient height, density, and of all year-round foliage (evergreen) to obscure the scheme to a sufficient level to both protect my health and the amenity of my home.
  - 3. The height of the first tens rows of PV panels in the PV array field in the vicinity and visible from my property, located within order limit are set at a maximum 1 metre in height.

John McKenna On behalf of Frederik G Bentley





Appendix 1 Outlook from my boundary fence



Appendix 2 Stocks Cottage ORDER LIMIT **PVA FIELD** Boundary

Fence

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Set Aside/Buffer Zone

Appendix 3

