

## Report of the Head of Planning, Sport and Green Spaces

**Address** LAND SOUTH HOLLOWAY LANE/NORTH HARMONDSWORTH LANE  
HOLLOWAY LANE HARMONDSWORTH

**Development:** Solar Energy Farm for the local generation of low carbon electricity to the Local Distribution Network, including the installation of solar photovoltaic panels and associated infrastructure.

**LBH Ref Nos:** 1354/APP/2015/2752

**Drawing Nos:** updated Archaeological Desk-Based Assessment Nov. 2015  
1267-0201-01 Issue 5  
Response to Consultee Comments. Letter dated 24/11/2015  
Agricultural Land Classification Report dated 5/11/2015  
1267-0201-25 Site Section  
Community Feedback Results  
1267-0205-03 fencing  
1267-0206-09  
1267-0207-16  
1267-0207-20  
1267-0207-40  
1267-0208-52  
1267-0208-72  
Addendum to Glint and Glare Impact Assessment  
A091892 LM01 v2 Landscape Masterplan  
Ecological Appraisal  
Glint and Glare Impact Assessment reduced  
Great Crested Newt Survey  
GFE277 -Screening Air Quality Assessment Report  
1267-0204-00 Holloway Lane CCTV Detail ISS0  
Covering Letter  
1267-0200-15 Holloway Lane Site Location Plan ISS0

<b>Date Plans Received:</b>	22/07/2015	<b>Date(s) of Amendment(s):</b>	24/11/2015
<b>Date Application Valid:</b>	22/07/2015		07/10/2015
			22/07/2015
			23/07/2015

### 1. SUMMARY

Planning permission is sought for a solar farm, with associated access tracks, inverters, maintenance building, fencing and infrared cameras on Green Belt land to the south of Holloway Lane.

One petition bearing 58 signatures and three letters of objection from local residents have been received objecting to the proposal mainly on the loss of high quality agricultural land and lack of benefit to the local community.

The proposal does not conform to the types of development allowed by national, London Plan and Local Plan policies and as such, the proposal constitutes inappropriate development in the Green Belt, requiring very special circumstances to justify the proposal.

The applicant has submitted that the wider benefits associated with the increased production of energy from renewable sources is a very special circumstances argument and the proposal will help establish the borough as a centre of renewable energy activity. There is also access to the local distribution network from the site, whilst the impact of the proposed development would be temporary, with full removal of the development in future. In addition the applicant considers that the site is lower grade agricultural land and the agricultural use of the land will be maintained, facilitating a sustainable form of agricultural diversification.

However, an extensive area of land would be covered by straight rows of above ground coloured panels and their supporting framework, which would represent a major change, forming an extensive and incongruous feature, which would detract significantly from the rural character of the landscape. The design and siting of the proposed solar arrays and the associated structures would give the area a suburban / industrial appearance and would intrude into the undeveloped landform, resulting in harm to the openness and purposes of the Green Belt at this location.

No very special circumstances have been provided by the applicant or are evident, which overcome the presumption against inappropriate development in the Green Belt or demonstrate that the benefits that the proposed solar farm will deliver outweigh the harm caused to the Green Belt. It is therefore recommended that planning permission be refused for this reason.

With regard to the site's agricultural land classification, the land was restored to best and most valuable agricultural land ("BMVAL"), following gravel extraction and land fill. The site is designated as grade 1 agricultural land according to Council records and Grade 2 according to the applicant's own assessment and is currently in use for arable farming. The applicants have failed to justify the use of best and most valuable agricultural land for the proposed solar farm.

In addition, the submitted Archaeological and Heritage Desk-Based Assessment has failed to demonstrate that the proposed development could be completed without detriment to the recognised archaeological value of this area.

It is therefore recommended that planning permission be refused for these reasons.

## 2. **RECOMMENDATION**

### **REFUSAL for the following reasons:**

#### **1 NON2 Non Standard reason for refusal**

The proposal represents inappropriate development within the Green Belt and no very special circumstances have been provided or are evident which either singularly or cumulatively overcome the presumption against inappropriate development in the Green Belt. The proposal is therefore contrary to the aims of Policy OL1 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), Policy 7.16 of the London Plan (2011) and the NPPF.

#### **2 NON2 Non Standard reason for refusal**

The proposed development, by reason of the siting, overall size, bulk and height of the proposed structures and buildings, the associated infrastructure and the increased intensity of use would prejudice the openness of the Green Belt, resulting in an unacceptable degree of urbanisation. The proposal is therefore contrary to Policy OL1 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) Policy 7.16 of the London Plan (2015) and the NPPF.

**3 NON2 Non Standard reason for refusal**

The applicants have failed to justify the use of best and most valuable agricultural land, for purposes other than agriculture, contrary to Local Plan Part 1 Policy EM2, Policy OL12 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), London Plan Policy 7.22 and the provisions of the NPPF.

**4 NON2 Non Standard reason for refusal**

The submitted The Archaeological and Heritage Desk-Based Assessment has failed to demonstrate that the proposed development could be completed without detriment to the recognised archaeological value of this area, including the Harmondsworth Archaeological Priority Area (APA) and Heathrow Archaeological Priority Zone (APZ). The proposal is therefore contrary to Policy BE3 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and the NPPF.

**INFORMATIVES**

**1 I52 Compulsory Informative (1)**

The decision to REFUSE planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

**2 I53 Compulsory Informative (2)**

The decision to REFUSE planning permission has been taken having regard to the policies and proposals in the Hillingdon Unitary Development Plan Saved Policies (September 2007) as incorporated into the Hillingdon Local Plan (2012) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including the London Plan (2015) and national guidance.

AM14	New development and car parking standards.
AM15	Provision of reserved parking spaces for disabled persons
AM7	Consideration of traffic generated by proposed developments.
BE1	Development within archaeological priority areas
BE38	Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
BE4	New development within or on the fringes of conservation areas
EC1	Protection of sites of special scientific interest, nature conservation importance and nature reserves Replaced by PT1.EM7 (2012)
EC3	Potential effects of development on sites of nature conservation importance
MIN10	Restoration and after-use of sand and gravel workings in the Colne Valley
MIN11	After-use of mineral sites - landscaping and screening
MIN6	Consideration of impact on farming of proposals for mineral extraction/disposal of waste
MIN7	Restoration of good agricultural land following mineral extraction
OE1	Protection of the character and amenities of surrounding properties and the local area
OL1	Green Belt - acceptable open land uses and restrictions on new

	development
LPP 5.1	(2015) Climate Change Mitigation
LPP 5.12	(2015) Flood risk management
LPP 5.7	(2015) Renewable energy
LPP 7.17	(2015) Metropolitan Open Land
LPP 7.22	(2015) Land for Food
LPP 7.19	(2015) Biodiversity and access to nature

### 3

The Local Planning authority has taken into consideration the requirements of paragraph 186 and 187 of the National Planning Policy Framework and has worked pro-actively with the applicant through extensive negotiations to address material planning issues wherever possible. Notwithstanding these discussions, the scheme was ultimately considered to fail to comply with the development plan for the reason identified above.

## 3. CONSIDERATIONS

### 3.1 Site and Locality

The application site forms part of a larger land holding owned by SITA, a recycling and resource management company, associated with the waste management operations located off Holloway Lane. The site is approximately 7.82 ha in extent, 4.11 ha of which will be utilised for the proposed solar farm. The site, which is square in shape, is situated to the south of Holloway Lane and north of Harmondsworth Lane and is currently used for arable cultivation.

The field is generally level with a slight fall from 30 metres AOD in the north to 26 metres AOD in the south. Field boundaries are defined by established tall hedges with occasional trees. The hedge quality and density is variable, with the northern boundary denser than that on the Harmondsworth Lane boundary. The Ansell Garden Centre lies immediately to the north of the site, which is accessed from Holloway Lane. The M4 lies to the north.

There is an area of scrub along the east boundary with the adjacent land, which was formerly a gravel pit, part of which is currently used as a re-cycling centre. The southern boundary is defined by a tall, outgrown field hedgerow, which in part, screens the site from Harmondsworth Lane. The land to the west is also arable land at the north end, while at the southern end is a line of residential properties extending westwards towards the centre of Harmondsworth Village.

### 3.2 Proposed Scheme

Planning permission is sought for a proposed solar farm, with associated access tracks, inverters, maintenance building, fencing and infrared cameras. The PV panels will be installed on a grid basis positioned on racks at a minimum height of 0.8m above the ground, rising to a maximum height of approximately 2.4m. The PV panels will be orientated to the south in order to capture maximum solar energy.

The proposal includes two inverter cabins which will house the main site transformer and its connectivity hub and will be located within the solar arrays.

The proposed solar farm also includes a single DNO switchgear building (measuring approximately 2.8 in length, 2.5m in width and 2.38m in height) and a single private

switchgear unit (measuring approximately 2.7m in length, 2.4m in width and 2.3m in height), which are located close to the south-eastern corner of the site.

The proposed solar farm is designed to maintain setbacks from the site boundaries, notably the western boundary. The proposed site layout also comprises supplementary landscape planting, in order to further mitigate potential views of the solar arrays. All landscaping will involve native species to contribute to nature conservation and biodiversity

No external artificial lighting is proposed. however, a 2 metre high security fence and thermal imaging cameras will be installed within the site.

The construction traffic required for the proposed solar farm will access and egress the site via the existing SITA site entrance along Holloway Lane, which connects to the north-eastern corner of the site. The permanent access for the DNO substation would be from Harmondsworth Lane and this would involve three to four visits by small vehicles during the course of a year.

The proposed solar farm will have the ability to provide the equivalent power to supply the needs of approximately 1,300 homes within the area. The applicants submit that the proposals will not only contribute towards the renewable energy objectives of the Council, but also national policy objectives aimed at reducing carbon dioxide emissions and increasing security and reliability of energy supply.

The application is supported by a number of reports and documents that assess the impact of the proposal. A schedule of these reports are provided below:

- Planning Statement (incorporating a Design and Access Statement)
- Flood Risk Assessment
- Ecological Report
- Energy Sustainability Statement
- Heritage Statement
- Statement of Community Involvement
- Air Quality Assessment
- Tree condition Survey
- Drainage Strategy Rev A
- Noise Impact Assessment
- Community Feedback Results
- Agricultural Land Classification Report
- Updated Archaeological Desk-Based Assessment
- Site Selection and Justification Report

The Council has confirmed that an Environmental Impact Assessment (EIA) is not necessary in this case.

### **3.3 Relevant Planning History**

#### **Comment on Relevant Planning History**

The application site is currently in agricultural use, but was previously subject to mineral extraction and infilling with waste materials.

Planning permission was granted on 3 September 1979 by the Department of Environment following a High Court appeal for the extraction of sand and gravel and refilling with waste materials on the Holloway Lane site (Planning Ref:1354/A/73/316). Mineral workings commenced shortly after and continued until the early 1990's. The minerals processing plant with associated silt ponds were located within the centre of the site.

Planning permission was subsequently granted for additional related development within this area. By the mid 1990's, mineral extraction, landfilling and restoration had been completed at the site except for the plant area and access road.

## **4. Planning Policies and Standards**

### **UDP / LDF Designation and London Plan**

The following UDP Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM2 (2012) Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation

Part 2 Policies:

- AM14 New development and car parking standards.
- AM15 Provision of reserved parking spaces for disabled persons
- AM7 Consideration of traffic generated by proposed developments.
- BE1 Development within archaeological priority areas
- BE38 Retention of topographical and landscape features and provision of new planting and landscaping in development proposals.
- BE4 New development within or on the fringes of conservation areas
- EC1 Protection of sites of special scientific interest, nature conservation importance and nature reserves Replaced by PT1.EM7 (2012)
- EC3 Potential effects of development on sites of nature conservation importance
- MIN10 Restoration and after-use of sand and gravel workings in the Colne Valley
- MIN11 After-use of mineral sites - landscaping and screening

MIN6	Consideration of impact on farming of proposals for mineral extraction/disposal of waste
MIN7	Restoration of good agricultural land following mineral extraction
OE1	Protection of the character and amenities of surrounding properties and the local area
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LPP 7.22	(2015) Land for Food
LPP 7.19	(2015) Biodiversity and access to nature

## **5. Advertisement and Site Notice**

**5.1** Advertisement Expiry Date:- **21st October 2015**

**5.2** Site Notice Expiry Date:- Not applicable

## **6. Consultations**

### **External Consultees**

35 adjoining owner/occupiers have been consulted. The application has been advertised as a departure from the development plan. Three letters of objection from local residents have been received, objecting to the proposals on the following grounds

1. Loss of agricultural land.
2. Object to the principle of the development on Green Belt land.
3. Impact on the semi rural environment enjoyed by Heathrow Villages.

In addition, one petition bearing 58 signatures from local residents has been received objecting to the proposal for the following reasons:

1. The agreement for SITA to use the land for landfill was that the land be returned to agricultural land at the end of the landfill project.
2. The land has since been farmed by original farmers as agreed with SITA.
3. Only land that falls within the category of Grade 3 land according to SITA would be used as a brown field site. This land has reached the quality of Grade 2 land and therefore falls into the original agreement to return it to its original state, which local farmers have achieved over the last 7 years.
4. British Solar renewables would not be providing jobs for local people
5. At the end of the use by BSR the land would most likely be built on again, destroying part of the legacy of Heathrow Villages.

### **GREATER LONDON AUTHORITY (GLA)**

After considering the report, the Mayor was unconvinced that the environmental benefits associated with the production of renewable energy outweighed the importance of the Green Belt.

If your Council subsequently resolves to grant permission on the application it must consult the Mayor again under Article 5 of the Order and allow him fourteen days to decide whether to allow the draft decision to proceed unchanged, or direct the Council under Article 6 to refuse the

application.

You should therefore send me a copy of any representations made in respect of the application, and a copy of any officer's report, together with a statement of the decision your authority proposes to make, and (if it proposed to grant permission) a statement of any conditions the authority proposes to impose and a draft of any planning obligation it proposes to enter into and details of any proposed planning contribution.

If your Council resolves to refuse permission, it need not consult the Mayor again (pursuant to article 5(2) of the Order) and your Council may therefore proceed to determine the application without further reference to the GLA.

#### GLA Stage 1 Report (Summary)

London Plan policies on Green Belt, and climate change are relevant to this application. The application complies with some of these policies but not with others and on balance does not comply with the London Plan; the reasons and potential remedies to issues of non compliance are set out below:

- Principle of development: The proposal represents inappropriate development on Green Belt land and is contrary to London Plan policy 7.16. The production of energy from renewable sources could constitute a 'very special circumstances' argument and supports London Plan policies 5.5 and 5.7. However, further information should be provided by the applicant to demonstrate that the environmental benefits that the proposal will bring outweigh the resultant harm to the Green Belt.

#### HARMONDSWORTH AND SIPSON RESIDENTS ASSOCIATION

HASRA has received many comments regarding the development of this piece of land and the majority have been against the proposal. The primary reason against the Solar Farm development is the size and quality of the land which is to be used to secure the solar panels. The proposed field is grade 1 agricultural land and is being taken away from arable farming for which it is currently used. By preventing the local farmers from tilling this land for arable crops it is seriously affecting the local environment as well as causing detriment to the livelihood of those local people employed on the land and in associated works. Based on the information received from the developer, the Solar Farm will not provide any employment or significant benefit to the local community.

#### HARMONDSWORTH CONSERVATION AREA ADVISORY PANEL

I am writing on behalf of Harmondsworth Conservation Area Advisory Panel. We were prepared to accept a similar scheme on a nearby plot of land (46223/APP/2014/1867), as it had been left in an unusable state following gravel extraction, and remediation was part of the proposals; however permission was refused on the basis that it was an inappropriate use for Green Belt land. In the present case, the Green Belt land has been returned to arable use following gravel extraction. We would therefore not wish to see permission granted, as it would prejudice the continuing arable agriculture and employment in the area; we trust a consistent approach to solar farms will be adopted by the Council and this application will also be refused.

#### HEATHROW SAFEGUARDING

We have no safeguarding objections to the proposed development. However, we would like to make the following observation:

Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British



Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. This is explained further in Advice Note 4, 'Cranes and Other Construction Issues' (available at [http://www.aoa.org.uk/operation & safety/safeguarding.htm](http://www.aoa.org.uk/operation%20&%20safety/safeguarding.htm)).

Also, aside from the consideration above, we have assessed the impact of the proposed development on the operation of the potential third runway at Heathrow (based upon the current proposal recommended by the Davies Commission). The development presented does not pose a risk to aerodrome safety in relation to the current proposals. This assessment may need to be reviewed should a third runway be approved particularly if the scheme changes.

## HISTORIC ENGLAND

The Greater London Archaeological Advisory Service (GLAAS) provides archaeological advice to boroughs in accordance with the National Planning Policy Framework and GLAAS Charter. The National Planning Policy Framework (Section 12) and the London Plan (2011 Policy 7.8) emphasise that the conservation of archaeological interest is a material consideration in the planning process. Paragraph 128 of the NPPF says that applicants should be required to submit appropriate desk-based assessments, and where necessary undertake field evaluation, to describe the significance of heritage assets and how they would be affected by the proposed development. This information should be supplied to inform the planning decision.

Appraisal of this planning application using the Greater London Historic Environment Record and information submitted with the application indicates a need for further information to reach an informed judgment of its impact on heritage assets of archaeological interest.

The application site lies directly adjacent to the Harmondsworth and the Heathrow Area Archaeological Priority Area. The Archaeological and Heritage Desk-Based Assessment submitted with the application (WYG Planning & Environment, July 2015) shows that the site lies within a highly significant archaeological landscape with evidence of occupation dating from the Palaeolithic through to the post-medieval period, including Bronze Age cremations and burials within the vicinity.

The submitted report also identifies that recent mineral extraction has occurred within the surrounding area, although it is uncertain if such activity has ever taken place within the application site. Section 11 of the submitted report indicates that further assessment is being carried out in order to clarify the nature and extent of impact to the archaeological survival from recent mineral extraction. This additional assessment does not appear to have been submitted with the application.

The extent of the impact from the proposed works is also unclear, and further clarification on the nature and extent of the impact from the proposed development should be carried out.

I therefore recommend that the following further studies should be undertaken to inform this application:

### Desk-Based Assessment

Submission of the additional assessment to identify the extent of previous mineral extraction within the application site as detailed within the submitted report. This should also include further assessment of the extent of the impact from the proposed development.

Then, depending on the results of the additional phase of desk-based assessment, a Geophysical Survey Archaeological geophysical survey uses non-destructive techniques to detect the likely presence of archaeological features. It is usually used as part of a field evaluation to inform a planning decision. Geophysical survey is largely restricted to undisturbed greenfield sites and certain

types of archaeological remains.

Followed by a targeted evaluation. An archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A field evaluation report will usually be used to inform a planning decision (predetermination evaluation) but can also be required by condition to refine a mitigation strategy after permission has been granted. In this case, evaluation would aim to target features / anomalies identified within the geophysical survey, or where results from the geophysical survey is unclear, an even distribution across the area of proposed impact to fully assess the nature and significance of the archaeological resource.

The nature and scope of assessment and evaluation should be agreed with GLAAS and carried out by a developer-appointed archaeological practice before any decision on the planning application is taken. The ensuing archaeological report will need to establish the significance of the site and the impact of the proposed development. Once the archaeological impact of the proposal has been defined a recommendation will be made by GLAAS.

The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation.

If archaeological safeguards do prove necessary, these could involve design measures to preserve remains in situ or where that is not feasible archaeological investigation prior to development. If a planning decision is to be taken without the provision of sufficient archaeological information then we recommend that the failure of the applicant to provide adequate archaeological information be cited as a reason for refusal.

Please note that this response relates solely to archaeological considerations. If necessary, Historic England's Development Management or Historic Places teams should be consulted separately regarding statutory matters.

### **Internal Consultees**

#### **FLOOD AND DRAINAGE OFFICER**

The Flood Risk Assessment demonstrates that there is sufficient space within the site to control surface water to greenfield run off rates. However it is not demonstrated that the method of control, a swale, which requires excavation is appropriate, considering the previous use of the site as landfill. The Planning Statement states that further information on ground conditions will be provided. This information, alongside information on the restoration of this area to reinstate to agricultural land is required in order to provide sufficient information to ensure any proposed drainage design is suitable

It should also be noted that there are no positive connections from the site currently discharging water from the site or Thames Water sewers in the vicinity. Therefore future detailed drainage design must take that into account. It will not be acceptable to discharge to Highway drainage ditches in the area.

#### **ENVIRONMENTAL PROTECTION UNIT (EPU)**

##### **Land Contamination**

There is no contaminated land report. This is a second area looked at for solar panels at this location, the other area being north of Holloway lane. We have a file on the site which details the land

filling of the old quarry here before a return to agriculture. A site investigation would be required to assess the current state of the landfill including gas levels prior to any development. It may not be a big problem if there are no deep excavations for the solar array. However the risks need to be looked at. Also there is a gas venting borehole on this site. The standard condition COM 30 will be acceptable.

#### COM30- Contaminated Land

(i) The development hereby permitted shall not commence until a scheme to deal with contamination has been submitted in accordance with the Supplementary Planning Guidance Document on Land Contamination and approved by the Local Planning Authority (LPA). The scheme shall include all of the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A desk-top study carried out by a competent person to characterise the site and provide information on the history of the site/surrounding area and to identify and evaluate all potential sources of contamination and impacts on land and water and all other identified receptors relevant to the site;

(b) A site investigation, including where relevant soil, soil gas, surface and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(c) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with details of a watching brief to address undiscovered contamination.

(ii) If during development works contamination not addressed in the submitted remediation scheme is identified, the updated watching brief shall be submitted and an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) All works which form part of the remediation scheme shall be completed and a comprehensive verification report shall be submitted to the Council's Environmental Protection Unit before any part of the development is occupied or brought into use unless the LPA dispenses with any such requirement specifically and in writing.

REASON: To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policy OE11 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

#### Air Quality

This proposal has no implication on local air quality during its operational phase.

We require however that the fleet used during the construction period uses Euro VI or equivalent and complies with requirements introduced by the Mayor's 'The control of dust and emissions during construction and demolition SPG.

#### HIGHWAY ENGINEER

There are no highway objections to the proposed development of the solar farm.

#### URBAN DESIGN AND CONSERVATION OFFICER

**BACKGROUND:** The proposed site is situated adjacent to the Harmondsworth Village Conservation Area, Harmondsworth Archaeological Priority Area (APA) and Heathrow Archaeological Priority Zone (APZ). There are various Listed and Locally Listed building within the wider vicinity of the site. The site is noted as Agricultural Land Class: Grade 1 and is designated Greenbelt land.

**COMMENTS:** Archaeological comments and recommendations have been addressed by the Greater London Archaeological Advisory Service (GLAAS), which conclude that pending further information, further investigation will be required.

The Harmondsworth Village Conservation Area Appraisal states that, 'Surrounding the village are fields and open land, which provide a setting of open agricultural/ rural land.' This provides a clear characterisation of the wider setting surrounding the Conservation Area. Therefore, taking into account the site's location and proximity to various designated and non-designated heritage assets, the proposal would have an impact on the wider setting of the Conservation Area and heritage assets. Holloway Lane and Harmondsworth Lane act as the gateways into the Conservation Area. The Solar Energy Farm would not contribute or enhance the character of the surrounding area.

Prior to any decision further information would be required. If the proposal is to be recommended for approval various mitigation methods would need to be stated and put into place to ensure there is minimal impact to the character of the surrounding area.

- Whilst the gradient of the site has been noted in the planning statement, it would be useful for a section drawing to be included, depicting the gradient of the site and positioning of the Solar PV panels.
- It is important that the proposed plant screening is mature and established throughout the duration of the Solar Energy farm and throughout all seasons, therefore further information is required in regards to the type of planting/ hedgerow to be used in relation to screening the site.
- Whilst the planning statement indicates the management of vegetation through grazing (sheep), the positioning of the solar panels and associated fencing would not allow for such maintenance therefore some amendments may be required.

If approved the following would need to be appropriately conditioned in order to sustain the character, significance and sense of rurality of the surrounding area.

- As stated in the applicant's planning statement, the duration for use as a Solar Energy Farm for 25years (preferably less) would need to be conditioned to ensure the site is restored back to its original agricultural use.
- A ground maintenance management plan including future works in order to restore the site to its original agricultural use, would need to be submitted prior to the commencement of works. This would ensure the site is appropriately maintained and allow for it to revert back to its original use for arable farming.
- All materials, colours and external finished of all elements associated to the proposed Solar Energy Farm would need to be stated prior to final approval, and would therefore need to be conditioned. This would include Solar PV framework, security fencing and ancillary infrastructure, which would need to remain in keeping with the surrounding landscape.

#### TREE AND LANDSCAPE OFFICER

#### LANDSCAPE CHARACTER / CONTEXT:

- The local landscape character and its sensitivity to change is described in The Hillingdon Landscape Character Assessment, (2012) under local landscape character type, K1 Harmondsworth Open Gravel Terrace.

Landscape planning designations:

- Trees on the site are not protected by TPO or Conservation Area designation.
- Harmondsworth Village Conservation Area lies immediately to the west of the site (at the southern end).
- The site is designated Green Belt.

Landscape planning policies:

- Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate.
- Saved policy OL1 and 2, and the National Planning Policy Framework seek to restrict inappropriate development and retain the openness, character and appearance of the Green Belt.

#### PROPOSAL:

The proposal is to use the site as a solar energy farm for the local generation of low carbon electricity to the Local Distribution Network, including the installation of solar photovoltaic panels and associated infrastructure.

#### LANDSCAPE CONSIDERATIONS:

- The proposal involves the installation of approximately 13,800 photovoltaic panels and associated inverters and sub-stations, covering an area of 11 acres and surrounded by 2metre high, dark green, security fence set in from the existing boundaries of the 19 acre site.
- The equipment will be situated on open arable land. No trees or other landscape features of merit will be affected by the proposal.
- A Landscape & Visual Impact Appraisal has been prepared, based on the recommendations in Guidelines for Landscape & Visual Appraisal, 3rd edition, 2013.
- At 3.1.4 sources of potential effects on the landscape and views, during construction, are noted.
- At 3.1.5 effects after the completed development are identified - including the change of use from arable to pasture with ground mounted solar arrays, the introduction of new built structures, vehicle movements and lighting associated with the operational needs of the site and the establishment of screen vegetation.
- At 3.1.7 the report notes that existing boundary hedging will be retained on all sides and that supplementary hedge planting will take place to ensure that existing habitats are improved.
- At 4.2.4 the report refers to Hillingdon's Landscape Character Assessment and Landscape Character Area K1, Harmondsworth Open Gravel Terrace, which assesses this area.
- The local landscape character is described in 4.2.7.
- At 6.1.2 the landscape effects after construction are summarised as minor adverse to negligible.
- At 6.1.3 the visual assessment concludes that there are moderate adverse effects for some residential, road and footpath receptors at view location 3 due to short term immediate views into the site and minor adverse effects for view location 4b and 5b. The effects on other receptors will be negligible.
- At 6.1.4 the report notes that the site can be re-instated to its current use following decommissioning after 25 years with negligible impact.
- The Landscape Masterplan, WYG dwg. No. LM.01 indicates that the security fencing around the solar farm will be set back from the field boundaries and that a new native hedgerow will be planted along the south and west boundaries and in the south-east corner, which should help to plug any existing gaps and eye level views into the site.
- The space between the existing boundaries and the solar farm compound will be planted with species rich grassland suitable for livestock grazing.
- A small compound in the south -east corner will accommodate a private sub-station, DNO station and spares container.
- An Ecological Assessment should be conditioned.
- Great Crested Newt Survey, by WYG concludes (chapter 5.0) that mitigation is not required. However, it also notes opportunities to enhance the site, which should be conditioned.

- A Flood Risk Assessment by Ramboll concludes that if consent is granted a shallow swale will be created around the solar farm in order to intercept surface water runoff.
- If the application is recommended for approval, landscape conditions should be imposed to ensure that the proposals preserve and enhance the character and local distinctiveness of the surrounding natural and built environment.

#### RECOMMENDATIONS:

- While the proposed use constitutes development within the Green Belt, the use is environmentally friendly, reversible and temporary - albeit with a predicted life of up to 25 years.
- The visual impact assessment and submitted photographs show the views into the site during summer months, when the existing hedgerows create the best screening. While the existing hedgerows will not be so effective during the winter months, the installation of an inner hedge will, once established, help to reduce the visual permeability into the site even in the winter months.
- There is no objection to the associated landscape mitigation proposals, which include new hedge planting and other potential benefits which would all be a positive enhancement of the landscape character and biodiversity of the site.
- The National Planning Policy Framework advises that the essential characteristics of Green Belts is their openness, thus the loss of openness, however limited, would harm the essential character of the Green Belt.
- The design and siting of the proposed solar arrays and the associated structures would give the area a suburban / industrial appearance and be perceived as extending urbanisation outside, but close to the built up area.

On balance the application is unacceptable because it fails to address the last two points.

## **7. MAIN PLANNING ISSUES**

### **7.01 The principle of the development**

The National Planning Policy Framework (NPPF) sets out the national planning policy context for renewable energy. This framework supports a transition to a low carbon future in a changing climate and encourages the use of renewable energy. The NPPF states that to help increase the use and supply of renewable and low carbon energy, local planning authorities should recognise the responsibility on all communities to contribute to energy generation from renewable or low carbon sources. The National Planning Policy Framework requires local planning authorities to have a positive strategy to promote renewable or low carbon sources.

However, the whole of the application site is designated as Green Belt and there are currently no proposals to delete this land from its Green Belt designation. The main policy issue in relation to this development is therefore considered to be the principle of additional development within the Green Belt and its impact on the character and appearance of the Green Belt.

At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decisionmaking. Nevertheless, the document states that 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.

As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Para 88. states:

"When considering any planning application, local planning authorities should ensure that

substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".

The National Planning Policy Framework notes at Para 91, that when located in the Green Belt, elements of many renewable energy projects will comprise 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.

The NPPF paragraph 98 states that when determining planning applications for renewable energy developments, local authorities should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy and also recognise that small-scale projects provide a valuable contribution to cutting greenhouse gas emissions and approve the application if its impacts are (or can be made) acceptable.

The London Plan strongly supports the protection, promotion and enhancement of London's open spaces and natural environments. Policy 7.16: Green Belt states that in terms of planning decisions:

"The strongest protection should be given to London's Green Belt, in accordance with national guidance. Inappropriate development should be refused, except in very special circumstances. Development will be supported if it is appropriate and helps secure the objectives of improving the Green Belt as set out in national guidance".

In terms of local policy, Part 1 of the Local Plan continues to give strong protection to Green Belt land. The relevant policy in the Local Plan is EM2 which makes clear that:

"The Council will seek to maintain the current extent, "Any proposals for development in the Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test".

The 2007 Unitary Development Plan Saved Policies (currently serving as Part 2 of the Hillingdon Local Plan) are also relevant. Planning policy on Green Belt land is set out at Policies OL1, OL2 and OL4 in the 2007 Hillingdon Unitary Development Plan "Saved" Policies. These policies give strong emphasis to not normally permitting new building in the Green Belt, reflecting overarching national and London wide policies.

Of particular relevance is Saved Policy OL1 of the Hillingdon Local Plan Part 2, which endorses both national and London Plan guidance. Policy OL1 states 'Within the Green Belt, as defined on the Proposals Map, the following predominantly open land uses will be acceptable:

- Agriculture, horticulture, forestry and nature conservation;
- Open air recreational facilities;
- Cemeteries

The Local Planning Authority will not grant planning permission for new buildings or for changes of use of existing land and buildings, other than for purposes essential for and associated with the uses specified at (i), (ii) and (iii) above. The number and scale of buildings permitted will be kept to a minimum in order to protect the visual amenity of the Green Belt'.

VERY SPECIAL CIRCUMSTANCES

The proposal does not conform to the types of development allowed by Saved Policy OL1, the London Plan or the NPPF and as such the proposal will comprise inappropriate development, requiring very special circumstances to justify the proposal.

The applicant has sought to demonstrate that the proposed solar farm constitutes very special circumstances in the context of Green Belt Policy that justify development being permitted in this case. The very special circumstances advanced by the applicant are summarised below:

- There is a need for the development of sustainable localised and renewable energy generation and meeting this need is a national priority.
- There is access to the local distribution network from the site which is important for any renewable energy project to be viable without substantial lengths of new connection which may be prohibitive;
- the site is considered to be lower grade agricultural land and;
- The impact of the proposed development would be temporary with full removal of the development in future.

The applicant also advises that the solar farm would provide a number of benefits which are summarised as follows:

- The proposed solar farm will have the capacity to produce approximately 5 megawatts (MW), or sufficient power to supply the needs of 1,300 homes;
- the agricultural use of the land will be maintained and the proposed development will facilitate a sustainable form of agricultural diversification from arable farmland to renewable energy site with pasture through management of the wildflower grassland through sheep grazing;
  - there are opportunities to enhance the hedgerows and grassland around the margins of the field by sowing native herbs and grasses. This would improve the biodiversity of the site;
- The proposal will help establish the borough as a centre of renewable energy activity, which in turn has the potential for job creation.

In response to these very special circumstances arguments, it is acknowledged that the NPPF at para. 98 states that when determining planning applications, local planning authorities should not require applicants for energy development to demonstrate the overall need for renewable or low carbon energy. The 5 MW of green electricity, which would be exported to the national electricity grid is expected to displace 2,200 tonnes of carbon dioxide (CO<sub>2</sub>) per annum.

However, this is Green Belt land and the proposal needs to be assessed against relevant Green Belt policy. National Planning Policy Framework advises that the essential characteristics of Green Belts is their openness, thus the loss of openness, however limited, would harm the essential character of the Green Belt. As set out elsewhere in this report, it is considered that the development would cause harm to the openness and purposes of the Green Belt at this location.

The main purpose of Hillingdon's Green Belt is to keep land open and free from development, to maintain the character and identity of individual settlements and to make a clear distinction between rural and urban environments, in support of strategic objective SO3 of the Local Plan. The Local Plan aims to create sustainable communities by concentrating new development in urban areas and local town centres. The Green Belt's



role is to help reinforce this strategy by strictly controlling development in the open countryside. As such, the piecemeal loss of individual Green Belt sites such as this is not something the Council can support. The cumulative impact of a series of such changes could permanently affect the environmental status and amenity value of local areas of Green Belt such as this over time.

The point about the Green Belt designation running west to east across the Borough at this location is that whilst it is relatively narrow, it performs a valuable role, separating the main built up area of the Borough from Heathrow. This is pointed out as a key element contributing to Hillingdon's overall character in the Townscape Character Study, as part of the evidence base for Part 2 of the Local Plan. The Council would want to maintain the character and amenity of this important, relatively open area of Green Belt in future and avoid incursion by intrusive commercial activities, which can be more appropriately located elsewhere.

The Mayor notes in the GLA Stage 1 response, that in 2014, the energy outcomes secured by the GLA referable applications resulted in the installation of approximately 8 MW of new electrical capacity. The Mayor considers that the increased production of energy from renewable resources (in this case, up to 5MW) is welcomed from an energy perspective, helping to deliver the Mayor's strategic Policy 5.5 on decentralised energy generation and Policy 5.7 on increasing renewable energy generation. The production of energy from renewable sources could therefore constitute a 'very special circumstances' argument. However, the Mayor considers that the proposal represents inappropriate development on Green Belt land and is contrary to London Plan policy 7.16. The Mayor also considers, and officers agree, that the applicant has failed to demonstrate that the environmental benefits that the proposal will bring outweigh the resultant harm to the Green Belt.

#### AGRICULTURAL LAND

With regard to the applicant's submission that the site is currently low grade agricultural land, having conducted extensive research into the planning history of the site, it is clear that the land was restored to a high level, i.e. best and most valuable agricultural land ("BMVAL"), following gravel extraction and land fill. The land restoration was subject to an appeal, call in by the Secretary of State and a High Court judgement. The site, which was historically designated Grade 1 agricultural land, was restored to an unusually high specification, which aimed to revert the land 'as close as possible' to its original condition. It is understood that the land was given an award by the Sand and Balast Association, for outstanding restoration. According to Council records, the site is still designated as Grade 1 agricultural land, although the land remains unclassified on the DEFRA maps. It appears on that basis, the applicant initially considered that the site has neither grade 1, 2, or 3a agricultural land classification. In response to queries raised by Council officers on this issue, the applicants commissioned an Agricultural Land Classification Survey, which was undertaken on 22 October 2015. The survey indicates that the Application Site has an Agricultural Land Classification of Grade 2. This is categorised as 'best and most versatile' agricultural land.

Saved Policy UDP policy OL12 of the Local Plan Part 2 seeks to prevent the irreversible loss of Grade 1, 2 and 3A agricultural land, in recognition of the fact that agriculture remains a significant activity in the borough and contributes substantially to its visual character. In addition, London Plan Policy 7.22 - Land for Food, seeks to encourage and support thriving farming and land-based sectors in London, particularly in the Green Belt.

Whilst it is recognised that the impact of the proposed development would be for a limited period of 25 years, with full removal of the development in future, given the considerable length of time, this is not considered to be a temporary permission in the usual sense.

In terms of national policy, following the publication of the online Planning Practice Guidance (PPG) and certain Ministerial Statements, the Government's stance towards locating PV projects on agricultural land is less clear. There is arguably a degree of tension between national and local policies which seek to preserve the agricultural use of such land and policies which encourage the production of renewable energy, including solar PV schemes.

In terms of agricultural land, paragraph 112 of the NPPF states that the economic benefits of BMVAL should be taken into account, with preference being given to areas of poorer quality land for the development of solar farms. The NPPF defines the best and most versatile agricultural land as being classified as grades 1, 2 and 3a.

The National Planning Practice Guidance (NPPG), which came into force on 6 March 2014, identifies a number of factors which should be taken into account by Local Planning Authorities when determining applications for large-scale PV solar farms, including encouraging the effective use of land, by focussing large scale solar farms on previously developed and non-agricultural land, provided that it is not of high environmental value and, where a proposal involves greenfield land, considering whether:

- the proposed use of any agricultural land has been shown to be necessary and poorer quality land has been used in preference to higher quality land;
- the proposal allows for continued agricultural use where applicable and/ or encourages biodiversity improvements around arrays.

In relation to the above, a number of appeal decisions have confirmed that neither the NPPF nor the NPPG imposes any requirement to undertake a formal sequential assessment. However, it is noteworthy that on 25 March 2015, the former Secretary of State, published a ministerial statement on solar farms, in which he emphasised that proposals for a solar farm involving best and most valuable agricultural land ("BMVAL") would need to be justified by "the most compelling evidence", albeit that each application must be considered on its merits, in the light of material considerations.

Some guidance can be found in recent appeal decisions with regard to what is likely to satisfy the threshold of the "the most compelling evidence". Firstly, there is no prohibition on developing greenfield land. Secondly, this evidence does not have to take the form of a sequential assessment. However, in practice it may be difficult for applicants to demonstrate that the use of BMVAL is justified, unless they can also show that they have considered and discounted other sites within a proportionate search area on the grounds of land quality or unsuitability. The starting point is always likely to be the availability of a grid connection, as this is clearly a prerequisite for any PV scheme.

The applicant submits that the site was identified in early 2015, following consideration of prospective sites throughout the Borough and the neighbouring boroughs. As part of the initial phase of the site selection process, the applicant sought to identify previously developed land or brownfield sites on which a solar installation could be provided. The previously developed sites considered were largely restricted due to the presence of available grid infrastructure and capacity. In this regard, the applicant submits that the scope for providing a solar installation on previously developed land is essentially restricted to specific parts of the borough. In assessing prospective sites within the borough's urban

areas, the applicant considered vacant industrial sites and operational industrial sites with large warehouse buildings that could accommodate solar panels on their rooftops. However, the analysis did not reveal any sites that could suitably accommodate a solar installation of a suitable size. The principal reasons why a previously developed site was not identified as suitable include one of, or a combination of the following factors:

- Distance of the site from grid infrastructure;
- Land values and project viability;
- Visual exposure to neighbouring residential and commercial buildings.

With regard to agricultural land, the The GIS analysis in the Site Selection and Justification Report identified various areas of land as being potentially available as alternative sites, which were of a lower agricultural land classification grade to the application site and of sufficient size to accommodate a 5MW solar farm. However the report concludes that qualitative consideration of each alternative indicates that none are considered more preferable to the Holloway Lane site. However, it is noted that the site selection process early in 2015, was based on the premise that the application site was low grade agricultural land. Crucially, the site selection process predates the applicant's own Agricultural Land Classification Survey, which confirms that the site is categorised as 'best and most versatile' agricultural land.

There are other positive and/or mitigating factors, which may be relevant when considering whether the loss of agricultural land is justified. For example, as noted above, the applicant proposes some form of agricultural use to continue alongside the solar farm, in this case in the form of sheep grazing. Renewable schemes, such as solar PV, can also assist with the diversification of agricultural holdings, in accordance with the economic objectives set out in paragraph 28 of the NPPF.

However, it is noted that the current occupier of the land is a tenant farmer, who will be evicted from the land, should the development go ahead and the arable farming will cease completely. It is understood that the sheep grazing proposed would not be economically viable for a land holding of this size and would only be able to carry a small number of ewes. It is likely that an operator of a solar farm that did not have sheep already, would simply hire a few sheep during the year, to keep the grass down. This is unlikely to be regarded as farm diversification in the usual sense.

Ultimately, the impact on BMVAL is an important material consideration in the determination of any planning application for a large-scale solar PV scheme, although it is acknowledged that this is not the only determining issue. Each application must be considered on its merits and, in every case, the contribution towards increasing the supply of renewable energy and meeting national targets must also command significant weight. However, having taken the above matters into consideration, notwithstanding the conclusions of the Site Selection and Justification Report, it is considered that the applicants have failed to justify the use of best and most valuable agricultural land, contrary to Local Plan part 1 Policy EM2, Policy OL12 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), London Plan Policy 7.22 and the provisions of the NPPF. It is therefore recommended that the application be refused on this basis.

## CONCLUSION

It is considered that should the development be allowed, this part of the Green Belt land would fail to fulfill its function of checking unrestricted urban sprawl, or assist in

safeguarding the countryside from encroachment. The proposed solar farm would cause harm to the purposes of the Green Belt, as the proposed commercial development would intrude into the undeveloped landform and result in loss of openness to the Green Belt. The applicants have also failed to justify the use of best and most valuable agricultural land and no very special circumstances have been provided or are evident, which overcome the presumption against inappropriate development in the Green Belt, contrary to Local Plan part 1 Policy EM2, Policies OL1, OL2 and OL12 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012), London Plan Policies 5.20, 7.16 and 7.22 and the provisions of the NPPF. Objections are therefore raised to the principle of the development at this location and it is recommended that planning permission be refused for aforementioned reasons.

#### **7.02 Density of the proposed development**

Not applicable to this development.

#### **7.03 Impact on archaeology/CAs/LBs or Areas of Special Character**

The proposed site is situated adjacent to the Harmondsworth Village Conservation Area, Harmondsworth Archaeological Priority Area (APA) and Heathrow Archaeological Priority Zone (APZ). There are various Listed and Locally Listed buildings within the wider vicinity of the site.

#### **ARCHAEOLOGY**

The NPPF accords great weight to the conservation of designated heritage assets and also non-designated heritage assets of equivalent interest. Heritage assets of local or regional significance may also be considered worthy of conservation. Policy BE1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that the Local Planning Authority will only allow development, which would disturb remains of importance in archaeological priority areas where exceptional circumstances can be demonstrated. Part 2 Saved Policy BE3 states that the applicant will be expected to have properly assessed and planned for the archaeological implications of their proposal. Proposals which destroy important remains will not be permitted.

The application site lies directly adjacent to the Harmondsworth and the Heathrow Area Archaeological Priority Area. The Archaeological and Heritage Desk-Based Assessment submitted with the application shows that the site lies within a highly significant archaeological landscape, with evidence of occupation dating from the Palaeolithic through to the post-medieval period, including Bronze Age cremations and burials within the vicinity.

The originally submitted report also identifies that recent mineral extraction has occurred within the surrounding area, although it is uncertain if such activity has ever taken place within the

application site. Section 11 of that indicates that further assessment is being carried out in order to clarify the nature and extent of impact to the archaeological survival from recent mineral extraction. This additional assessment does not appear to have been submitted with the application.

Historic England (GLAAS) notes that extent of the impact from the proposed works is unclear, and further clarification on the nature and extent of the impact from the proposed development should be carried out. GLAAS therefore recommend that the following further studies should be undertaken to inform this application,

- a desk-based assessment to identify the extent of previous mineral extraction within the application site as detailed within the submitted report. This should also include further assessment of the extent of the impact from the proposed development.

- depending on the results of the additional phase of desk-based assessment, a geophysical survey followed by targeted evaluation.

GLAAS advise that should a planning decision be taken without the provision of sufficient archaeological information, then the failure of the applicant to provide adequate archaeological information be cited as a reason for refusal.

An updated Archaeological Desk-Based Assessment, has been submitted as part of this application, in order to address concerns raised by Historic England. GLASS has been reconulted and any comments received will be reported in the addendum. However, based upon the aforementioned advice so far received, it is considered that the applicant has failed to demonstrate that the proposed development could be completed without detriment to the recognised archaeological value of this area, including the Harmondsworth Archaeological Priority Area (APA) and Heathrow Archaeological Priority Zone (APZ). The proposal is therefore contrary to Policy BE3 of the the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) and the NPPF.

#### CONSERVATION AREA

Policy BE4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) states that new development within or on the fringes of conservation areas will be expected to preserve or enhance the features, which contribute to the conservation area's special architectural or visual qualities.

In tems of the impact on the adjoining conservation area, the Urban Design and Conservation Officer refers to the Harmondsworth Village Conservation Area Appraisal which states that 'Surrounding the village are fields and open land, which provide a setting of open agricultural / rural land.'

This provides a clear characterisation of the wider setting surrounding the conservation area. Holloway Lane and Harmondsworth Lane act as the gateways into the Conservation Area. Therefore, taking into account the site's location and proximity to various designated and non-designated heritage assets, the Urban Design and Conservation Officer considers that the proposal would have an impact on the wider setting of the conservation area and heritage assets and would not contribute or enhance the character of the surrounding area. Whilst it is not considered that the impact of the proposal on the setting of the adjoining conservation area would be so severe as to warrant refusal of the application on this basis, nevertheless, the loss of open agricultural/rural land adds weight to concerns relating to the impact of the Green Belt at this location.

#### **7.04 Airport safeguarding**

A Glint and Glare study has been submitted with the planning application. The study sets out a full glint and glare assessment with particular consideration being given to potential impacts upon operations at Heathrow Airport. Solar PV panels are designed to absorb as much light as possible and do not therefore generally give rise to issues associated with glint and glare. The study concludes that the overall reflection impacts for Heathrow Airport are assessed as negligible, and the proposed development fulfils Civil Aviation Authority guidance for solar farms.

The application was referred to Heathrow Aerodrome Safeguarding and a response was received, which stated that the proposal has been examined from an aerodrome safeguarding perspective and does not conflict with safeguarding criteria.

#### **7.05 Impact on the green belt**

The most important attribute of Green Belts is their openness and the aim of preserving the openness of Green Belt land is reiterated in the NPPF, the London Plan and the Hillingdon Local Plan .

The applicant advises that the proposed solar panels would be located and screened by existing trees and hedgerows and that the buildings would be limited to two inverter cabins, a temporary sub station and metering building, in addition to the ground mounted solar panels and ancillary structures. The applicant also argues that all negative impacts are temporary, as once the useful life of the solar panels has been reached, they, together with all ancillary structures, will be removed and the openness of the site will be restored. Finally, the character will have been significantly enhanced as a result of the land improvement, additional planting and biodiversity/habitat measures that will have been put in place.

The application includes a 'Landscape and Visual Impact Assessment' (L&VIA), which describes the landscape character and context and the significant areas of vegetation. The application includes a number of landscape photographs describing the landscape character and illustrating existing views in its landscape and visual assessment. The assessment concludes that the majority of the users of local footpaths and road users and cyclists of the roads bounding the site would experience a moderate adverse effect during the initial operation, reducing to minor adverse effect over the period of operation, with no changes after decommissioning.

The site is considered to offer a degree of visual amenity. In terms of the current proposal, the site currently supports an arable field. The greatest impact of the proposed development on the Green Belt would be upon its visual amenity due to the solar elements and associated ancillary structures within the landscape. An extensive area of land would be covered by straight rows of above ground coloured panels and their supporting framework. It is considered that this would represent a major change, forming an extensive and incongruous feature, which would detract significantly from the rural character of the landscape. The design and siting of the proposed solar arrays and the associated structures would give the area an industrial appearance and be perceived as extending urbanisation outside, but close to the built up area. The finished effect of developing this open, rural site for industrial purposes would be of projecting urban development into the countryside and would be alien to the rural character of the area generally.

From outside the site, impacts on openness and character will also be evident to a lesser extent from the immediately surrounding roads and will be compounded by the presence and visual impact of the boundary fence and CCTV cameras. The proposed fencing would also create a sense of enclosure that would compound the perception of loss of openness. As such, it is considered that the development would intrude into the undeveloped landform and would cause harm to the openness and purposes of the Green Belt at this location.

The Mayor considers and officers agree, that as currently presented, the proposed development would impact negatively on the openness and character of the Green Belt and that the very special circumstances put forward by the applicant do not currently outweigh the substantial harm caused to the Green Belt.

It is considered that the harm identified to the Green Belt adds to the substantial weight attached to the harm by reason of inappropriateness. Overall, the proposal would fail to accord with policy 7.16 of the London Plan 2015, policy EM2 of the Local Plan-Part 1 and policies OL1 and OL4 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November

2012) and the NPPF.

#### **7.07 Impact on the character & appearance of the area**

Policy BE13 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to ensure that the layout and appearance of new development harmonises with features of the area which are considered desirable to retain or enhance.

With reference to the location of development, the NPPG states that there are no hard and fast rules about how suitable areas for renewable energy should be identified, but in considering locations, local planning authorities will need to ensure they take into account the requirements of the technology and, critically, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to.

The NPPG further states that the deployment of large-scale solar energy farms can have a negative impact on the rural environment, particularly in undulating landscapes. However, the visual impact of a well-planned and well-screened solar farm can be properly addressed within the landscape if planned sensitively.

The application site is visible from public vantage points, including Harmonsworth Lane. Vegetation along the boundaries will help to screen immediate views to some extent, particularly from the north and south.

The site itself is fundamentally open in character, supporting an arable field. Whilst not of significant landscape value, the site contributes towards the setting of the adjoining conservation area and fulfills its Green Belt function of keeping land open and free from development, of maintaining the character and identity of individual settlements and making a clear distinction between rural and urban environments.

Whilst the surrounding area support various types of development, this is generally low key. As noted elsewhere in this report, the site is located in the Green Belt. The proposed solar arrays and the associated structures would affect the fundamental open character of the site, which the Local Planning Authority considers desirable to retain. The National Planning Policy Framework advises that the essential characteristics of Green Belts is their openness. Thus the loss of openness, however limited, would harm the essential character of the Green Belt.

While there is scope for soft landscape enhancement in the form of new/replacement planting within and around the proposed layout, it is not considered that this would mitigate against the built development, which will be visually evident. The design and siting of the proposed solar arrays and the associated structures would give the area an industrial appearance and be perceived as extending urbanisation into the existing rural landscape. The dispersal of the solar arrays and other paraphernalia associated with this commercial development would result in a significant urbanising effect, by transforming the open rural nature of the area to a harder, urban character, fragmenting the existing, spacious green landscape and influencing important views and vistas to and from the Green Belt.

In addition, if permitted, the development could create pressure, which may be hard to resist, to release the adjoining Green Belt sites future development. On balance, it is considered that the scheme would fail to conserve and enhance the visual amenity of the Green Belt, or harmonise with features of the area which are considered desirable to retain or enhance, contrary to Policies OL5 and BE13 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

## **7.08 Impact on neighbours**

Saved Policy OE1 and OE3 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seek to protect the environment from the adverse effects of pollutants and to ensure sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable.

There are residential properties to the west of the site fronting Harmondsworth Lane, but none in the immediate vicinity of the route that construction and delivery traffic will use to access the site.

As indicated by the Air Quality Assessment, the development will have no measurable impact on the level of air quality in the area, in view of the short build period, combined with measures to control the level of dust created during construction. The main source of noise is likely to be associated with transport movements during the construction phase which is expected to last some two months. The short construction period would limit the number of vehicle movements, which will only take place during normal working hours.

During the operational phase, the development will only require a very small number of visits to maintain it, once it becomes operational. As a result, it is considered that the traffic associated with the proposal will have very little effect on air quality, noise or traffic levels in the surrounding area. In addition, the solar arrays will be fixed and, accordingly, the facility will be silent during the operational phase. Finally, the Glint and Glare Assessment concludes that the PV panels will not be a source of nuisance to any local receptor.

It is therefore considered that the proposal would not cause harm to the amenity of surrounding adjacent residential properties, in accordance with Local Plan Part 1 Policy PT1.BE1 and Policies BE19 and OE1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

## **7.09 Living conditions for future occupiers**

Not applicable to this application, as the proposal does not include residential development. Living conditions for future residential occupiers is therefore not relevant to consideration of this proposal.

## **7.10 Traffic impact, Car/cycle parking, pedestrian safety**

Saved Local Plan Part 2 Policies AM2, AM7, AM14 and AM15 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) are concerned with traffic generation, on-site parking and access to public transport.

The construction traffic required for the proposed solar farm will access and egress the site via the existing SITA site entrance along Holloway Lane, which connects to the north-eastern corner of the site. The permanent access for the substation would be from Harmondsworth Lane and this would involve three to four visits by small vehicles during the course of a year.

The Highway Engineer raises no objections to the proposals which are considered to be in compliance with Policies AM2, AM7, AM14 and AM15 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012).

## **7.11 Urban design, access and security**

### **URBAN DESIGN**

Design matters are not the principal issues regarding this application. The Urban Design and Conservation Officer's comment are addressed in other sections of this report.



## SECURITY

The Metropolitan Police Crime Prevention Officer raises no objections to this proposal.

### **7.12 Disabled access**

Not applicable to this development.

### **7.13 Provision of affordable & special needs housing**

Not applicable to this development.

### **7.14 Trees, landscaping and Ecology**

#### TREES AND LANDSCAPING

Saved policy BE38 seeks the retention and utilisation of topographical and landscape features of merit and the provision of new planting and landscaping wherever it is appropriate. Saved policy OL1 and OL2, and the National Planning Policy Framework seek to restrict inappropriate development and retain the openness, character and appearance of the Green Belt.

The Landscape and Visual Impact Assessment (L&VIA) submitted in support of the application describes the local topography as being predominantly flat and whilst the landscape is open, views into the site are restricted by the hedgerows in the surrounding area. The vegetation along the boundaries, means that from most off-site vantage points, the interior of the site is effectively screened from view. However, there are sporadic gaps in the existing vegetation, through which it may be possible to see from the roads that immediately border the site, the top edge of solar panels. The scheme therefore includes proposals to enhance boundary landscaping, in order to ensure immediate views are minimised.

The Landscape and Visual Impact Assessment, together with Photoviews consider the likely visual impacts on the landscape character, public highways, public rights of way, residential properties and recreational facilities. Predictably the adverse impacts will be most evident during the construction / installation phase. The visual assessment concludes that there are moderate adverse effects for some residential, road and footpath receptors due to short term immediate views into the site and minor adverse effects from certain views. The effects on other receptors will be negligible. The report notes that the site can be re-instated to its current use following decommissioning after 25 years with negligible impact.

The Tree and Landscape officer notes that no trees or other landscape features of merit will be affected by the proposal. Landscape enhancement will include extensive areas of trees, shrubs and hedges along the boundaries. As part of the landscape management plan, the meadows will be grazed by sheep. The visual impact assessment and submitted photographs show the views into the site during summer months, when the existing hedgerows create the best screening. While the existing hedgerows will not be so effective during the winter months, the installation of an inner hedge will, once established, help to reduce the visual permeability into the site even in the winter months. There is no objection to the associated landscape mitigation proposals, which include new hedge planting. The Tree and Landscape Officer comments that if the application is recommended for approval, landscape conditions should be imposed to ensure that the proposals preserve and enhance the character and local distinctiveness of the surrounding natural and built environment.

## ECOLOGY

Hillingdon's Local Plan: Part 1 "Strategic Policies" (adopted November 2012) EM2 (Green Belt, Metropolitan Open Land and Green Chains), EM3 (Blue Ribbon Network), EM7 (Biodiversity and Geological Conservation) and EM8 (Land, Water, Air and Noise) deal with ecological issues.

Saved Policy EC2 of the Local Plan Part 2 seeks the promotion of nature conservation interests. Saved Policy EC3 requires proposals for development in the vicinity of sites of nature conservation importance to have regard to the potential effects on such sites on changes in the water table and of air, water, soil and other effects, which may arise from the development. Regarding the creation of new habitats, Savel Policy EC5 of the Local Plan seeks the retention of certain on-site ecological features, enhancement of the nature conservation and ecological interest of sites or create new habitats.

Policy 7.19 of the London Plan states that the planning of new development and regeneration should have regard to nature conservation and biodiversity and opportunities should be taken to achieve positive gains for conservation through the form and design of development.

The NPPF at para.109 states inter alia that the planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity. This central government advice confirms and reinforces relevant policies in the Hillingdon Local Plan and the London Plan.

A great crested newt survey of the pond which lies 30 metres from the site's eastern boundary was completed in June 2015. No great crested newts were found. The Ecological Assessment submitted in support of the application recommends a further nesting bird survey of scrub/trees if scrub is proposed for removal in nesting bird season and a bat activity survey along hedgerows that require removal. Ecological Assessment recommends ecological enhancements which include hedgerow management such as 'laying' and planting gaps with native woody hedgerow species, opportunities to enhance the grassland around the margins of the field and potentially beneath the solar panels by sowing with native herbs and grasses. This would increase the food source for invertebrates such as pollinating bees, which also provide a food source for a variety of animals such as birds and bats.

The site is not considered to be within a high quality area of ecology. However, the Strategy Planning Practice Guidance for renewable and low carbon energy encourages biodiversity improvements around arrays. Had the development been acceptable in other respects, it is considered that appropriately worded conditions would ensure that the development contributes to ecological enhancement, in accordance with Policy EM7 (Local Plan) and Policies 7.19 and 7.28 of the London Plan.

#### **7.15 Sustainable waste management**

Not applicable to this development.

#### **7.16 Renewable energy / Sustainability**

The Government has repeatedly emphasised its commitment to increasing the supply of renewable energy. In accordance with European Union Directive 2008/28/EC, published in April 2009, the UK's target is for 15% of all energy consumed to be from renewable energy sources by 2020. The UK's published solar PV strategy (October 2013 and April 2014) makes it clear that there is a considerable need for more generating capacity, if targets for renewable energy and, specifically, solar photovoltaic energy are to be met, that cost-

effective solar PV projects which deliver genuine carbon reductions are to be supported and that all local planning authorities have responsibility for assisting in achieving these objectives.

The NPPF requires Local Authorities to accept the need for an increased amount of renewable energy technology and therefore, the need for renewable energy technology is not disputed. The NPPF provides clear guidance on renewable energy developments. It states that one of the core principles of planning is to support the transition to a low carbon future in a changing climate. However, as noted elsewhere in this report, the NPPF recognises the conflict of delivery renewable energy and protecting Green Belt.

In terms of renewable energy, the proposed solar photovoltaic farm is expected to displace 2,200 tonnes of CO<sub>2</sub>/year. As set out in London Plan policy 5.5 on decentralised energy generation, the proposal will contribute to achieving the Mayoral target for 25 percent of the heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. The proposal will also help deliver London Plan policy 5.7 on increasing renewable energy generation, where the Mayor seeks to increase the proportion of energy generated from renewable sources.

However, as noted elsewhere in this report, the NPPF recognises the conflict of delivery renewable energy and protecting Green Belt. The harm of the site's specific location (in this case in the Green Belt) needs to be weighed up against this positive renewable energy contribution.

#### **7.17 Flooding or Drainage Issues**

The site is not located in Flood Zones 2 and 3, but the site exceeds 1 hectare in extent. A Flood Risk Assessment (FRA) has been submitted in support of the application. The FRA confirms that the site lies wholly within Flood Zone 1 and that the only flood risks are from ground water and sewer sources. The ground water risk is associated with large water bearing gravel deposits which lie within the southern area of the Borough. These deposits have, however, been quarried from the site.

The Flood and Drainage Officer notes that the Flood Risk Assessment demonstrates that there is sufficient space within the site to control surface water to greenfield run off rates. However it is not demonstrated that the method of control, a swale, which requires excavation, is appropriate, given that the previous use of the site as landfill. No information on ground conditions has been provided. This information, is required in order to ensure any proposed drainage design is suitable.

However, drainage calculations demonstrate that a feasible strategy can be implemented to ensure there are no significant impacts on flood risk. Had the development been acceptable in other respects, it is considered that an appropriately worded condition could be imposed to address flood and drainage related issues. Subject to this condition, it is considered that the risk of flooding on and off site would be minimised. The proposal is therefore considered to accord with Policy EM6 (Flood Risk Management) of the Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policies OE7 and OE8 of the Local Plan Part 2 Saved UDP Policies, Policy 5.12 and 5.13 of the London Plan (2015) and the Technical Note Planning Policy Statement 25.

#### **7.18 Noise or Air Quality Issues**

##### **AIR QUALITY**

The site lies within an Air Quality Management Area and Local Plan Policy PT1.EM8 requires that an applicant demonstrates its proposal will cause no worsening of air quality.

The application includes an Air Quality Assessment which identifies that there is some limited potential for air quality impacts as a result of dust created during the construction phase, which can be minimised by controlled measures. It concludes that impacts from construction activities are not significant.

During the operational phase of the development, traffic exhaust emissions are identified as being the only potential source of air pollution and that impacts from this source are likely to be negligible.

It is considered that the proposal will have no measurable impact on the level of air quality in the area, in view of the short construction phase, combined with measures to control the level of dust created during construction, which could be secured by condition in the event of an approval.

It is noted that in the wider context, the generation of up to 5MW from a non-polluting renewable source, which will reduce CO2 emissions by up to 2,200 tonnes a year, will save thousands of tonnes of pollutants from entering the atmosphere and will thus have a significant beneficial impact upon general air quality.

Overall, it is considered that the development complies with Policy 7.15 of the London Plan and Local Plan Policy PT1.EM9.

## NOISE

Saved Policies OE1 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) seeks to protect the environment from the adverse effects of pollutants and to ensure sufficient measures are taken to mitigate the environmental impact of the development and ensure that it remains acceptable. Saved Policy OE3 seeks to ensure that uses which have the potential to cause noise be permitted only where the impact is appropriately mitigated.

The main source of noise is likely to be associated with transport movements during the construction phase, which is expected to last approximately 6 to 8 weeks. However, the site access is located away from the nearest residential properties in Harmonsworth Lane.

Due to the nature of the proposal, the development will only require a very small number of visits to maintain it, once it becomes operational. As a result, the traffic associated with the proposal will have very little effect on noise levels or traffic levels in the surrounding area. The solar arrays will be fixed (i.e. they will not track the sun) and accordingly, the facility will be silent during the operations phase. Notably, officers in the Council's Environmental Protection Unit have raised no objections in this regard.

Accordingly, it is not considered that the development would result in a significant increase in noise which could have a detrimental impact on residential amenity, in compliance with relevant policies.

### **7.19 Comments on Public Consultations**

The main issues arising from the public consultation are the loss of high quality agricultural land and the impact of the development on the semi rural character of the Heathrow Villages. These issues have been dealt with in the main body of the report.

The applicant also commissioned a door knock in the villages of Sipson and Harmondsworth, with the aim of making residents aware of the proposals and to answer

any questions they might have. The door knocking took place over two Fridays, after the application had been submitted, on the 16th October in Harmondsworth, and the 30th October in Sipson. The applicant reports that over the two days, contact was made with over 90 households in the area. Residents in Harmondsworth were far more aware of the proposals than residents in Sipson. However, the majority of residents in both villages were unbothered by the proposals, neither supporting nor objecting to the plans. Residents were grateful for being informed proactively of the plans. While there were a few residents who were strongly against the proposals, there were similar numbers who were very positive about them. Generally however, most residents were not interested.

#### **7.20 Planning obligations**

Policy R17 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012) is concerned with securing planning obligations to supplement the provision of recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. These saved UDP policies are supported by more specific supplementary planning guidance.

The Council's Section 106 Officer has reviewed the proposal, as have other statutory consultees, including the Greater London Authority. The comments received indicate that no contributions or planning obligations are required to mitigate the impacts of the development.

#### **7.21 Expediency of enforcement action**

There are no enforcement issues associated with this application.

#### **7.22 Other Issues**

There are no other issues associated with this application.

### **8. Observations of the Borough Solicitor**

#### General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

#### Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

### Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

### Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

## **9. Observations of the Director of Finance**

Not applicable.

## **10. CONCLUSION**

The proposal does not conform to the types of development allowed by national, London Plan and Local Plan policies and as such the proposal constitutes inappropriate development in the Green Belt, requiring very special circumstances to justify the proposal.

The applicant has submitted that the wider benefits associated with the increased production of energy from renewable sources; harm to the openness of the Green Belt is limited and the impact of the proposed development would be temporary constitute a very special circumstances argument to justify why normal Green Belt policy should not apply in this case.

Clearly, the proposal will make a significant contribution towards the targets set out in the London Plan and the Council's objective of ensuring that by 2026, the generation of energy from renewable sources is common practice. However, this must be weighed against the drawbacks of the proposed development, in terms of the impact on the Green Belt and the loss of high quality arable agricultural land. No very special circumstances have been provided or are evident, which overcome the presumption against inappropriate development in the Green Belt.

It is considered that the proposed development would impact significantly from the rural character of the landscape. The design and siting of the proposed solar arrays and the associated structures would give the area an industrial appearance and would intrude into the undeveloped landform, resulting in harm to the openness and purposes of the Green Belt at this location. It is considered that the harm identified to the Green Belt adds to the substantial weight attached to the harm by reason of inappropriateness.

The applicants have also failed to justify the use of best and most valuable agricultural land and has failed to demonstrate that the proposed development could be completed without detriment to the recognised archaeological value of this area.

It is therefore recommended that planning permission be refused for these reasons.

## **11. Reference Documents**

National Planning Policy Framework (NPPF)

London Plan 2015

UK Solar PV Strategy Part 1: Roadmap to a Brighter Future (Department of Energy & Climate Change)

UK Solar PV Strategy Part 2: Delivering a Brighter Future (Department of Energy & Climate Change)

Hillingdon Local Plan Part 1 Strategic Policies

Hillingdon Local Plan: Part 2 - Saved UDP Policies (November 2012)

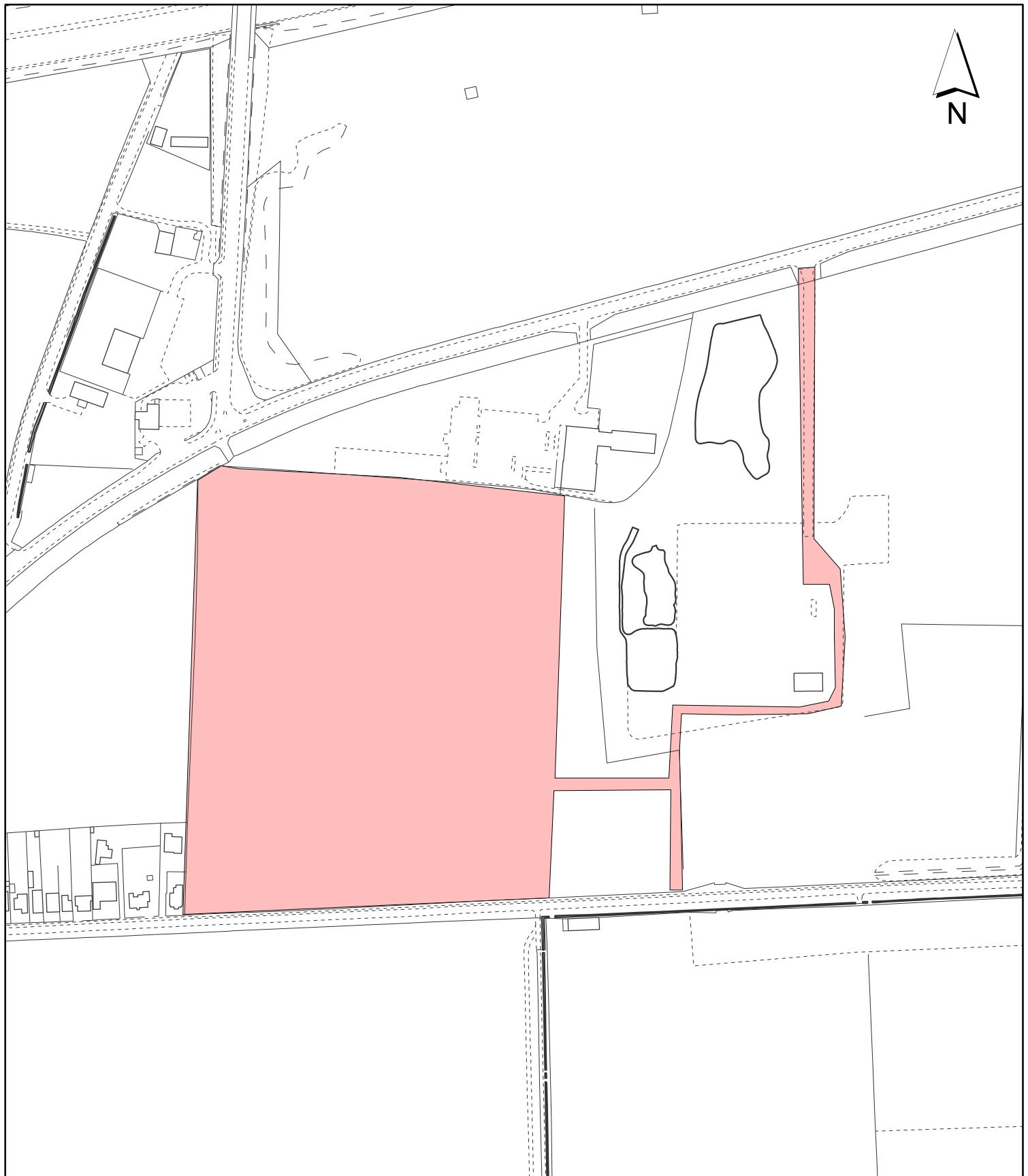
Council's Supplementary Planning Guidance - Community Safety by Design

Council's Supplementary Planning Document - Air Quality

Building Research Establishment (BRE) Information Paper "Solar dazzle reflected from sloping glazed facades.

**Contact Officer:** Karl Dafe

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**Notes:**

 Site boundary

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Site Address:

**Land South Holloway Lane/  
 North Harmondsworth Lane  
 Holloway Lane (Solar Farm)**

**LONDON BOROUGH  
 OF HILLINGDON**

**Residents Services  
 Planning Section**  
 Civic Centre, Uxbridge, Middx. UB8 1UW  
 Telephone No.: Uxbridge 250111

Planning Application Ref:

**1354/APP/2015/2752**

Scale:

**1:3,500**

Planning Committee:

**Major**

Date:

**November 2015**



**HILLINGDON**  
 LONDON