



Shaun Greaves
Planning and Building Control
North Hertfordshire District Council
Council Offices
Gernon Road
Letchworth Garden City
Herts SG6 3JF

Our Ref:

Your Ref:

12th January 2022 (by email)

Dear Mr Greaves,

Application no 21/03380/FP
Land to the North and East of Great Wymondley
Proposed solar farm measuring 88 hectares with associated battery storage containers,
transformers stations, storage buildings, fencing etc including means of access.

I write with reference to the above application to register CPRE Hertfordshire's strong objection to the installation of this large solar farm, notwithstanding our firm support for sustainable forms of electricity generation, and specifically solar generation related to buildings and previously developed land. Certain renewable energy sources, however, if not properly controlled, can have serious consequences for our natural environment.

At present within Hertfordshire there is a proliferation of similar applications for solar energy installations across the Green Belt. The cumulative effects of these proposals will have a significant and damaging impact on wide areas of highly valued open countryside and agricultural land.

National Planning Practice Guidance (Renewable and low carbon energy, June 2015) is clear that: "this does not mean that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities." CPRE Hertfordshire thus objects to this application for the following reasons.

1. The land identified for this proposed development is located within the London Metropolitan Green Belt as identified in the adopted North Herts District Local Plan and the emerging North Herts Local Plan which is presently subject to Examination in Public.
2. Green Belt is a policy and land use designation which includes large areas of open countryside and landscape and the Applicant states in their Planning Statement Part 1 that "The Site is not subject to any landscape designations" (para. 2.1.10). This could be said to be misleading and suggest that there is no constraint placed upon the use of the



land in terms of landscape value when the designation of Green Belt is affected by a wide range of factors, including landscape character.

3. The land proposed for this development performs vital functions as open countryside, both for agriculture and recreation, and for the conservation and enhancement of the natural environment. The National Planning Policy Framework (NPPF) as revised in July 2021 requires land designated as Green Belt to be kept “permanently open” (para. 137) and “inappropriate development... should not be approved except in very special circumstances” (para. 147).
4. The applicant acknowledges in the Planning Statement accompanying the application that “very special circumstances” need to be demonstrated sufficient to outweigh harm to the Green Belt, and these are stated by the applicant to be related primarily to the benefits of provision of renewable energy, and the 40 year life of the proposed development.
5. The industrial nature of the photo-voltaic panels and associated infrastructure will change the nature of the countryside in this area for a generation. The presence of large areas of glass and metal are entirely inappropriate for a designated protected area whose purpose is expressly to maintain its openness permanently (NPPF para. 138).
6. National Planning Policy Guidance also provides specific guidance on solar farms (para 13) and notes: “the deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes.” The large extent of this proposal, 88 hectares, will make a very considerable impact on the area, by virtue of both the solar panels themselves, and the associated infrastructure.
7. Ministerial letters of November 2013 and April 2014 have stated that the need for renewable energy does not automatically override environmental protection and local authorities should ensure that proposals for solar farms are appropriately sited, and give proper weight to environmental considerations such as landscape. As noted above, National Planning Practice Guidance (PPG) indicates that provision for renewable and low carbon energy generation should not override environmental and local communities’ concerns.
8. We believe that the local environmental impact is unacceptable in this area which is designated to be protected. Ground-mounted solar installations are not locationally constrained as they require only direct sunlight, and we do not accept that there are ‘very special circumstances’ for locating this proposal on land designated as Green Belt.



9. The principle of openness is a key test for the maintenance of Green Belt, as emphasised in several court cases (including Lea Valley Regional Park vs Epping Forest DC; Samuel Smith vs North Yorks County Council) and this will be severely jeopardised by the fencing, transformers and other bulky and unsightly equipment associated with this proposal. The applicant accepts that this is a matter for the judgment of the Council in the determination of this application.
10. As noted by very many residents and objectors, the area is extensively used by walkers and the local communities for recreational purposes. The proposed development will be highly visible over a wide area and from several public rights of way, specifically from the Hertfordshire Way which is a regional amenity and effectively forms the entire northern and part of the eastern boundary of the site.
11. The present use of the land for agriculture should be maintained. The applicant indicates that the land affected is Agricultural Grades 2 and 3a which are defined as Best and Most Versatile (BMV) land by DEFRA. It is entirely inappropriate that BMV land should be sterilised by a non-agricultural use.
12. The importance of open countryside has been constantly emphasised throughout the pandemic, and the beneficial aspects of maintaining such areas are likely to be increasingly recognised. CPRE Hertfordshire has prepared a [Policy Statement](#) which is attached, providing further information to assist in the determination of applications for ground-mounted solar installations.
13. Our Policy Statement also indicates the impacts of large ground-mounted installations on biodiversity and wildlife. These concerns are particularly relevant with regard to designated protected areas and CPRE Hertfordshire urges the Council to refuse permission for this damaging proposal.

Yours sincerely,

Chris Berry
Planning Manager

Enc. [CPRE Hertfordshire Solar Energy Installations Policy](#)