



Andrew Parrish
Planning and Development
Dacorum Borough Council
Civic Centre, Marlowes
Hemel Hempstead
Hertfordshire HP1 1HH

Our Ref:

Your Ref:

20th April 2022 (by email)

Dear Mr Parrish,

Application no. 22/01106/MFA
Solar Array, Little Heath Lane, Little Heath, Berkhamsted
Installation of ground-mounted solar PV panels, vehicular access, internal access track,
landscaping and associated infrastructure including security fencing, CCTV cameras, and grid
connection infrastructure including transformers, substation compound buildings and
cabling route to the point of connection.

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, 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) is clear that the promotion of renewable energy: "does not mean that that the need for renewable energy automatically overrides environmental protections and the planning concerns of local communities." CPRE Hertfordshire thus objects strongly 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 Dacorum Local Plan (Core Strategy). The emerging Dacorum Local Plan, which has recently been consulted upon, also includes Green Belt designation.



2. Green Belt is a policy and land use designation which includes large areas of open countryside and landscape and the Applicant states in its consultant's Planning Design and Access Statement that the site is "located within the Metropolitan Green Belt and is adjacent to the boundary of the Chiltern Area of Outstanding Natural Beauty (AONB)(sic)". 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.
3. 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). In addition, the setting of the AONB is a constraint on inappropriate development and Council planning officers noted in March 2021 that "the proposals would clearly represent inappropriate development in the Green Belt".
4. 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).
5. As noted above, national Planning Policy Guidance (PPG) provides specific guidance on solar farms (Renewable and Low Carbon Energy) and notes that factors to consider include "the effect on a protected area such as an Area of Outstanding Natural Beauty or other designated areas." PPG also states that "the deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes."
6. Ministerial statements of April 2013 and March 2015 are also quoted in PPG, noting that the need for renewable energy should not automatically override environmental protection. The large extent of this proposal, 32 hectares, will make a very considerable impact on the area, by virtue of both the solar panels themselves, and the associated infrastructure.
7. The Applicant acknowledges that "very special circumstances" need to be demonstrated sufficient to outweigh harm to the Green Belt and these are stated to be related primarily to the benefits of the provision of renewable energy during the 40 year life of the proposed development and the suggestion that "this site is sequentially the preferred site".



8. We do not believe that very special circumstances have been demonstrated by this application. Ground-mounted solar installations are not locationally constrained as they require only direct sunlight, and it is not appropriate to locate this proposal on land designated as Green Belt.
9. The proposed site is also a particularly poor site for a solar installation as it contravenes the guidelines adopted and publicised by Solar Energy UK (the solar energy industry trade association). Their guidance states that 'solar farms' should be sited on level land, not on sloping, visually prominent land.
10. The proposed development is located on a highly visually-prominent open site, situated on rising land. It would be easily seen from the sloping hillsides to the southwest, south and southeast, ranging from the Hall Park estate on the eastern side of Berkhamsted, to the Little Hay golf course.
11. A number of public rights of way, including The Hertfordshire Way, run up the southern side of the valley and above the site, to the northwest and north. The amenity of local communities will also be seriously harmed in Little Heath Lane, Sugar Lane, the village of Bourne End, and to the west in the Hall Park estate on the eastern side of Berkhamsted
12. 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*). This will be severely jeopardised by the fencing, transformers and other bulky and unsightly equipment associated with this proposal.
13. The proposed development comprises at least a dozen metal shipping container type buildings, including 7 transformer stations, a control room, a DNO substation, a GRP Unit substation, a Group Client switchroom, a storage container, a spares container, and a welfare office. The dimensions of these various metal buildings range up to 4 metres high, 5 metres wide, and 11 metres long.
14. Further buildings and associated equipment include a toilet building over three metres high ("a waterless evaporating toilet"), galvanised two metre high steel deer fencing around much of the site, and in excess of 70 CCTV security cameras mounted on four metre high poles. With more than 1500 glass and metal photovoltaic panels, situated on metal support frames, each panel being 2.8 metres high, this constitutes considerable industrialisation of the landscape.



15. The proposed site is in the narrow countryside gap that currently exists between Berkhamsted and Hemel Hempstead, which is already threatened by proposals for up to nearly 1200 houses in this area. The cumulative impact of these residential developments (already approved and under construction) and the solar installations would reduce the gap considerably and be extremely detrimental to the small village of Bourne End, which would become nearly surrounded by development.
16. The Applicant appears to suggest that part of their justification is the proposed release of a further large area of Green Belt for housing west of Hemel Hempstead and the assertion that this and the proposed area for the solar installation “share the same landscape and characteristics”. This is clearly nonsense and a key concern is the cumulative impact of several ground-mounted solar installations throughout Hertfordshire and the recent increasing number of major applications for both housing and solar generation comprise a major threat to open countryside.
17. The views from several public rights of way are quoted by the Applicant as being affected but then dismissed as irrelevant and again we challenge these assertions. The presence of existing and planned development is quoted as affecting the amenity quality of existing open countryside (Planning Design and Access Statement, para 10.6.8 seq.) and we regard this as disingenuous as local communities and residents are highly concerned by the cumulative impacts of all intrusions into the countryside.
18. 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 the suggestion by the Applicant that there will be no intervisibility between the Chilterns AONB and the proposed site is inaccurate.
19. The present use of the land for agriculture should be maintained. The Applicant states the land is categorised as Grade 3b and we urge the Council to verify through their own enquiries the exact nature of the soils on the site. In any case, 32 hectares of moderately productive agricultural land can provide 200 tonnes of grain per year and should be used for food production to maintain and enhance domestic UK food security.
20. The importance of open countryside has been constantly emphasised throughout the recent pandemic, and the beneficial aspects of maintaining such areas are likely to be increasingly recognised. Recent legislation such as the Environment Act emphasises the importance of maintaining and enhancing biodiversity.



21. Contrary to the Applicant's assertions, the 40 year timeframe proposed is not "temporary" for wildlife and habits which would be irreparably harmed. Birds become injured or killed by mistaking the glass panels for water, small mammals get trapped in the fencing, and pollinators and other insects have their habitats compromised by extensive areas of solar panels.
22. The public consultation exercise conducted by the developer was very limited, being online only, with leading questions requiring the respondent to force rank several possible "concerns" such as climate change and biodiversity, and the suggestion of limited local opposition is misleading and inaccurate. CPRE Hertfordshire is also concerned by the negative screening decision and would ask the Council to reconsider its position on similar matters in the future.
23. 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. These concerns are particularly relevant with regard to designated protected areas.
24. CPRE Hertfordshire reiterates its support for renewable energy and notes that Solar Energy UK estimates there are over 617,000 acres of suitable, south-facing commercial rooftops available for solar panels. We believe that rooftops and previously developed land should be utilised for solar energy and we urge the Council to refuse permission for this damaging proposal.

Yours sincerely,

Chris Berry
Planning Manager

Enc. CPRE Hertfordshire Solar Energy Installations in the Countryside Policy Statement Sept 2021