



The countryside charity
Hertfordshire

31a Church Street

Welwyn

HERTS AL6 9LW

www.cpreherts.org.uk

office@cpreherts.org.uk

01438 717587

Standing up for Hertfordshire's countryside

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

Our Ref:

Your Ref:

30th March 2022 (by email)

Dear Shaun Greaves,

Application: 22/00709/FP
Land To The South Of Wymondley Substation And South Of Sperberry Hill, St Ippolyts
Proposed solar farm measuring 35.5 hectares with associated
battery storage and ancillary infrastructure

I write with reference to the above application to register CPRE Hertfordshire's strong objection to the installation of this large solar farm, for the following reasons.

1. The land identified for this proposed development is located within the London Metropolitan Green Belt as identified in the North Herts District Local Plan and performs a vital function as open countryside, both for agriculture and recreation, and the conservation and enhancement of the natural environment. The National Planning Policy Framework (NPPF) 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).
2. 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 35 year life of the proposed development. The industrial nature of the solar panels and associated infrastructure will however change the nature of the countryside in this area for a generation.
3. National Planning Practice Guidance (Renewable and low carbon energy) 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, 35 hectares, will make a very considerable impact on the area, by virtue of both the solar panels themselves, and the associated infrastructure.

CPRE is working nationally and locally for a beautiful and living countryside

CPRE Hertfordshire is a Charitable Incorporated Organisation

President: Sir Simon Bowes Lyon, KCVO
Chairman: Allan McNab

Registered Charity 1162419



4. 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. Solar farms 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.
5. 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.
6. CPRE Hertfordshire is fully committed to renewable energy generation and supports solar energy generation on buildings and previously developed land. According to Government estimates, a very significant proportion of solar generation could be provided on rooves, particularly on industrial land and the large-scale warehousing and large floor plate distribution buildings increasingly being provided for new economic activity.
7. It is neither necessary nor appropriate to use designated protected land for ground-mounted solar generation which entirely changes the character and quality of the open countryside. It introduces an industrial element by virtue of glass and steel installations and a wide range of supporting industrial structures which prejudice the key purposes for which the Green Belt was designated.
8. The present use of the land for agriculture should be maintained. The entire site is categorised as Grades 2 and 3a, constituting Best and Most Versatile land as defined by DEFRA. This classification should provide further protection against inappropriate development.
9. The Applicants, in their Planning Design and Access Statement, seek to assert that circumstances have changed since a smaller application for solar generation in this area in 2015 was rejected on the basis of 'very special circumstances' (VSC) not having been demonstrated for development in the Green Belt. In our view, not only have VSC not been demonstrated on the original grounds, but issues regarding national food security are gaining in significance, leading to the need to preserve high quality agricultural land.



10. In addition, recently enacted legislation, including the Environment Act is placing growing emphasis on the need to stem losses of biodiversity and existing wildlife. It is inevitable that the proposal will cause considerable disruption to existing wildlife on the site, and attempts to suggest net gains in biodiversity rest on the introduction of additional species which will change the character of the landscape.
11. The area is extensively used by walkers and the local communities for recreational purposes, with three footpaths crossing the site, and the proposed development will be highly visible over a wide area and from several public rights of way. 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.
12. A key concern which needs to be taken into account is the cumulative impact of such installations. CPRE Hertfordshire is aware of several existing and potential planning applications for ground-mounted solar installations on protected land in Hertfordshire and together these will amount to a major onslaught on the highly valued and dwindling resource of open countryside.
13. It is not reasonable to assess each planning application solely on its merits when a key concern is the cumulative impact of several similar proposals in the same area. Wider strategic issues such as the efficiency of generation by this method, and the eventual disposal of worn-out panels and other infrastructure should be considered as well as the damage and impact on the countryside.
14. Large-scale developments of this nature pose a major challenge to the rural character of protected areas which are not replicable elsewhere. Further information on our policy position is presented in the enclosed CPRE Hertfordshire Policy Statement (also available on our website at <https://www.cpreherts.org.uk/news/our-policy-statement-on-solar-energy-installations-in-the-countryside/>). Solar generation should take place where agricultural and protected landscape factors are not present, and we urge the Council to refuse this application.

Yours sincerely,

Chris Berry
Planning Manager

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