



Naomi Reynard  
Planning & Building Control  
North Herts District Council  
PO Box 10613  
Nottingham  
NG6 6DW

Our Ref:

Your Ref:

11<sup>th</sup> May 2022 (by email)

Dear Naomi Reynard,

**Application no. 22/00741/FP**  
**Land West of Ashwell Road, Bygrave, SG7 5EB**  
**Ground mounted solar photovoltaic (PV) farm including battery energy storage; continued agricultural use, ancillary infrastructure, security fencing, landscaping provision, ecological enhancements and associated works.**

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.

We note that the proposed development covers nearly 57 hectares and at present in Hertfordshire there is a proliferation of similar applications for solar energy installations across farmland and designated protected areas of open countryside. The cumulative effects of these proposals will have a significant and damaging impact on wide areas of highly valued open landscape 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 designated as Rural Area Beyond the Green Belt (RABGB) in both the adopted North Herts District Local Plan and the emerging North Herts Local Plan which is presently subject to Examination in Public. The Planning Design and Access Statement submitted by PACE Pathfinder Clean Energy makes virtually no mention of this key policy constraint; it is briefly and misleadingly referenced in



section 7.1.2 (page 44) 'Saved Local Plan Policies' which omits to indicate the protection offered by this policy to the countryside.

2. 'Saved' Policy 6 within the adopted North Herts District Local Plan seeks to "maintain existing countryside and villages and their character" with exceptions in certain specified villages and other circumstances related to individual buildings or "strictly necessary for agriculture." It is clearly inappropriate to suggest, as PACE implies, that a large-scale solar energy installation is equivalent to agricultural use and such an inference is misleading at best.
3. Strategic Policy SP5 Countryside and the Green Belt, in the emerging North Herts Local Plan (NHLP); "recognise(s) the intrinsic value of the countryside" and maintains the designation of RABGB where the Council "will operate a general policy of restraint" thus constituting a presumption against inappropriate development in this area. In describing RABGB, paragraph 4.59 on the NHLP notes that "In terms of intrinsic character and beauty, this area contains some of the highest quality countryside in the District" and 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.
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 long rows of metal and glass panels, ancillary buildings and infrastructure would comprise a utilitarian and industrialised form of development contrasting directly with the unspoilt open qualities of the site and introduce a hugely discordant element into the local landscape.
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, approximately 57 hectares, will make a very considerable impact on the area, by virtue of both the solar panels themselves, and the associated infrastructure.



7. Ground-mounted solar installations are not locationally constrained as they require only direct sunlight. It is neither appropriate nor necessary to locate such installations on valued open countryside which has been designated to be protected through the Local Plan process.
8. The growing significant public and institutional response to this application indicates the inadequacy of the public consultation exercise undertaken by PACE in advance of its submission. Much play is made of the advance consultation results but it should be noted that already the number of responses received prior to submission (29) has been exceeded considerably by objections received since the application and this response is likely to grow significantly.
9. The area proposed is extensively used by the public and a number of public rights of way, including the Icknield Way, run adjacent or close to the land affected. Together with the proximity noted by many residents to the scheduled monuments of Arbury Banks, this will further increase the visibility and impact of this proposal to an unacceptable extent.
10. The proposed development will comprise a large number of inverters, transformers and switchgear units, sub-stations and battery storage units. These are in addition to the arrays of PV panels, high fencing, together with pole mounted security cameras, gates and additional roads which will constitute a considerable and unacceptable industrialisation of the landscape.
11. Concerns are being increasingly raised with regard to the safety aspects of the battery storage facilities associated with large solar energy installations, including the fire risks connected with lithium-ion batteries. These are not susceptible to traditional fire-fighting techniques and we understand that the Hertfordshire Fire and Rescue Service is not equipped to deal with such risks.
12. The present use of the land for agriculture should be maintained. The Applicant states the land is categorised as Grade 2 which is defined as Best and Most Versatile (BMV) land by DEFRA. BMV land should clearly be used for food production to maintain and enhance domestic UK food security and this requirement will only increase in the future.
13. The Applicant asserts that agricultural uses of the land can be continued during its temporary use as a solar installation. This is again misleading and unlikely to be true in any meaningful sense.



14. The present use of the land is for arable crop production and the suggested use for grazing animals would require a complete change of farming practice. It is self-evident that the presence of ground-mounted PV panels would severely limit the type and number of grazing animals which could be accommodated and it is inappropriate to assert that this is a viable alternative use.
15. 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.
16. Contrary to the Applicant's assertions, the 40 year timeframe proposed for the solar installation is not "temporary" for wildlife and habitats 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.
17. Insufficient information has been submitted in support of the application to demonstrate that there would not be an unacceptable impact to protected and priority species and their habitats which may include species such as great crested newts, bats, dormice and skylarks. This is needed to enable the Council to demonstrate its compliance with statutory duties including its biodiversity duty under Section 40 of the Natural Environment and Rural Communities Act 2006 as updated by the Environment Act 2021, and to be able to assess properly any potential impacts upon protected species.
18. Without this information, the Council will be unable to assess appropriately the proposals and impacts on legally protected and priority species as required by the National Planning Policy Framework. Such requirements are likely to increase in the future and this information should be provided at the outline application stage.
19. CPRE Hertfordshire is also concerned by the negative screening decision with regard to the requirement for Environmental Impact Assessment and would ask the Council to reconsider its position on similar matters in the future due to the undeniable environmental impacts of proposals of this magnitude.
20. 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.



21. 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 generation and we urge the Council to refuse permission for this damaging proposal.

Yours sincerely,

Chris Berry  
Planning Manager