



The countryside charity
Hertfordshire

31a Church Street
Welwyn

HERTS AL6 9LW

www.cpreherts.org.uk

planning@cpreherts.org.uk

01438 717587

Standing up for Hertfordshire's countryside

Planning Inquiry re: Solar Array, Little Heath Lane, Little Heath, Berkhamsted

Appeal Ref: APP/A1910/W/23/3317818

Interested party statement: CPRE Hertfordshire

1. Qualifications and Experience

1. My name is Christopher Berry and I hold a Bachelor of Arts with Honours in Geography from the University of London and a Post-Graduate Diploma in Town and Country Planning from the University of Newcastle upon Tyne. I have been a chartered member of the Royal Town Planning Institute since 1975 and have practised in both the public and private sectors for the duration of my career with over 45 years experience in planning and development.

2. I have been employed by a wide range of organisations including local government, development corporations, planning consultancies and development agencies. Latterly I have acted as interim Chief Planning Officer and Assistant Director for a number of London and Hertfordshire boroughs and I am presently employed as Planning Manager for CPRE Hertfordshire – the Countryside Charity.

3. CPRE Hertfordshire works to protect the countryside in Hertfordshire and is active in supporting local organisations and communities to protect open spaces and rural activities from inappropriate development and environmental degradation. CPRE Hertfordshire supports fully the position of Dacorum Borough Council in refusing the application and supports the evidence they have provided in this matter.

4. This statement has been prepared in accordance with the guidance of my professional institution (Royal Town Planning Institute). I confirm that these are my true and professional opinions.

Background to the Application

5. This application is for 32 hectares of land designated as London Metropolitan Green Belt in the Dacorum Borough Core Strategy serving various purposes of the Green Belt. The site performs a vital function as open countryside, both for agriculture and the significant

enjoyment of views and landscape, and the conservation and enhancement of the natural environment.

6. The site is immediately adjacent to the Chilterns Area of Outstanding Natural Beauty (AONB) whose setting adds to the significance of the Green Belt in this location. It is also bounded to the west by Little Heath Lane which forms the boundary of the AONB. The lane is well used and valued for recreational purposes, and affords extensive views across a wide area of undulating open landscape, including the setting of the AONB.

7. This application is one of a proliferation of similar applications for ground-mounted solar energy installations across the Green Belt in Hertfordshire. The cumulative effects of these proposals will have a significant and damaging impact on wide areas of highly valued open countryside and agricultural land.

CPRE Hertfordshire position

8. Notwithstanding our firm support for sustainable forms of electricity generation, and specifically solar generation related to building rooftops and previously developed land, CPRE Hertfordshire strongly opposes the application at Little Heath Lane for reasons related to the impact of the installation on the open countryside and rural communities. These reasons become even more salient when the land proposed for development is designated as Green Belt in both the adopted Dacorum Borough Core Strategy and emerging Local Plan.

9. Certain renewable energy sources, if not properly controlled, can have serious consequences for our natural environment. In principle, designated protected land should not be used for development which is highly damaging to the landscape and rural character.

10. This proposal effectively industrialises the landscape in the area, covering it with glass and metal panels and associated infrastructure. This Statement presents concerns relating to the existing landscape and characteristics of the countryside and landscape which we also believe amount to evidence in terms of their impact on local communities.

11. Our concerns relate to the significance of the Green Belt designation which seeks to protect the characteristics of the open countryside, including its intrinsic landscape and amenity value. The use and enjoyment by residents and visitors of public rights of way, especially to the south of the site, are highly significant. We believe that these concerns are inadequately, and in some cases incorrectly, addressed by the Applicant.

12. CPRE Hertfordshire objects to the application on several grounds related to our objectives as an organisation committed to protecting rural landscapes and activities. We are equally committed to the development of renewable energy and believe that solar energy generation is best provided on buildings and previously developed land rather than open countryside, in accordance with the aims of Government policy.

13. CPRE Hertfordshire supports fully the first and second reasons for refusal of the application by Dacorum Borough Council. Reason 1 notes that the very special circumstances put forward by the Applicant do not clearly outweigh the harm

caused to the Green Belt, and Reason 2 identifies the significant detrimental impact on landscape character of the area and the setting of the Chilterns AONB.

Government guidance on renewable energy generation

14. National Planning Practice Guidance (Planning for 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." (Paragraph: 003 Reference ID: 5-003-20140306). Paragraph 5 notes: "local planning authorities will need to take into account... crucially, the potential impacts on the local environment, including from cumulative impacts. The views of local communities likely to be affected should be listened to." (reference ID: 5-005-20150618)

15. Planning Practice Guidance (PPG) provides specific guidance on solar farms and notes that "cumulative impacts require particular attention, especially the increasing impact that ... large scale solar farms can have on landscape and local amenity as the number of ... solar arrays in an area increases" (Paragraph 007@ Reference ID: 5-007-20140306).

16. PPG also notes the importance of topography in assessing impacts to landscape, as follows: "local topography is an important factor in assessing whether ... large-scale solar farms could have a damaging effect on landscape and recognise that the impact can be as great in predominantly flat landscapes as in hilly ... areas" (op cit). Also, "proposals in ... Areas of Outstanding Natural Beauty (AONB), and in areas close to them where there could be an adverse impact on the protected area, will need further consideration" (op cit).

17. The guidance expressly notes that "protecting local amenity is an important consideration which should be given proper weight in planning decisions" (op cit). The guidance also states that "the deployment of large-scale solar farms can have a negative impact on the rural environment, particularly in undulating landscapes." (Paragraph 013: Reference ID: 5-013-20150327), and: "Particular factors a local planning authority will need to consider include: ...encouraging the effective use of land by focussing large scale solar farms on previously developed and non agricultural land" (op cit).

18. Ministerial statements of April 2013 and March 2015 are also quoted in the Planning Practice Guidance, 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.

19. The Draft National Policy Statement for Renewable Energy Infrastructure (September 2021) includes solar photovoltaic generation in Sections 2.47 to 2.54 and notes factors that should influence site selection by applicants. In terms of appropriate siting, the document notes that "where possible, ground mounted Solar PV projects should utilise previous developed land, brownfield land, contaminated land, industrial land, or agricultural land preferably of classification 3b, 4, and 5." (Para 2.48.13).

20. It also notes that in terms of duration, solar panels usually have a design life of 25 to 30 years which is less than the period of consent requested by the Applicant.

Green Belt concerns

21. Our primary concern is the protection and enhancement of designated protected land such as the Green Belt and Areas of Outstanding Natural Beauty (AONB). The National Planning Policy Framework (NPPF) as revised in July 2021 sets out the fundamental aim of Green Belt policy that land should be kept “permanently open”(para. 137) and “inappropriate development should not be approved except in very special circumstances”(para. 147).

22. The Applicant acknowledges that “very special circumstances” need to be demonstrated sufficient to outweigh harm to the Green Belt and in this case 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”.

23. The Applicant’s consultant asserts that the proposals would not compromise the objectives of the Green Belt. Paragraph 4.3.10 of their Planning, Design and Access Statement (PDAS) is illogical and meaningless as a justification for this position.

24. 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.

25. 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 solar panels, fencing, transformers and other bulky and unsightly equipment associated with this proposal.

26. The proposed development comprises at least a dozen metal shipping container type buildings, including seven transformer stations, a control room, a Distribution Network Operators 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.

27. 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.

28. The industrial nature of the solar panels and associated infrastructure will change the nature of the countryside in this area for at least a generation, and probably permanently. In any event the change will be regarded as permanent by those impacted by it.

29. An additional element affecting the Green Belt is the immediate setting of the AONB as a further constraint on inappropriate development. CPRE Hertfordshire supports fully the concerns of the Chilterns Conservation Board on this matter (see below).

30. The proposed site is also in the narrow countryside gap that currently exists between Berkhamsted and Hemel Hempstead, which is already threatened by proposals for up to 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, thus contributing to the coalescence of settlements.

31. In summary, CPRE Hertfordshire believes that ground-mounted solar energy installations should not be permitted in designated protected areas such as Green Belt and Areas of Outstanding Natural Beauty (AONB). The proposed development will cause definitional harm, introducing new built development across the inquiry site, removing entirely openness and replacing it with industrial type structures which are out of place and ugly.

32. Ground-mounted solar energy installations should not be located as to harm the purposes of Green Belts or reduce their openness, nor should they be permitted on, or cause damage to Sites of Special Scientific Interest (SSSIs) or adversely impact on Scheduled Ancient Monuments, nationally or locally listed buildings, Conservation Areas, Registered Parks and Gardens, or locally valued landscapes and non-designated heritage assets defined in Local Plans and Neighbourhood Plans.

Government and other policy statements

33. It is clear that the Government's intention is to retain the Green Belt in its present form. The constant attempts to undermine Green Belt protections for commercial developments such as ground-mounted solar energy generating installations are in danger of bringing the planning system into disrepute. The Government's position is also evolving with regard to protection of the Green Belt in response to local community and local planning authority concerns as noted below.

34. Recent Ministerial statements continue to reiterate the Government's strong support for protection of the Green Belt. Hertfordshire MPs, including Bim Afolami (Hitchin and Harpenden), Daisy Cooper (St Albans) and Julie Marson (Hertford) have received parliamentary responses re-emphasising the importance of protecting the Green Belt.

35. Specifically, Sir Mike Penning MP (Hemel Hempstead) received support from the Prime Minister on 25th January 2023 when he reiterated that the Government will always protect precious green spaces. The Prime Minister said: "our planning reforms will ensure that we can protect the Green Belt..." (Hansard 25.01.23)

36. The recently published “Levelling Up and Regeneration Bill Policy Paper: Further information” re-emphasises the Government’s support for protection of the Green Belt as follows:

a. “the increased weight given to plans and national policy by the Bill will give more assurances that areas of environmental importance – such as National Parks, Areas of Outstanding Natural Beauty...- will be respected in decisions on planning applications and appeals. The same is true of Green Belt, which will continue to be safeguarded.” (Creating beautiful places and improving environmental outcomes; In the Bill: LURB Policy paper, May 2022)” .

37. Further,

b. “Existing Green Belt protections will remain, and we will pursue options to make the Green Belt even greener.” (Creating beautiful places and improving environmental outcomes; Alongside the Bill: LURB Policy paper, May 2022).

Local Plan response

38. The recent Regulation 18 public consultation of the Dacorum Draft Local Plan received a record-breaking number of representations from organisations and individuals, including CPRE Hertfordshire. The majority of these responses were opposing site allocations for future residential and commercial development in the Green Belt.

39. Similar Regulation 18 consultations for neighbouring boroughs, Hertsmere and Three Rivers have also received huge responses opposing potential site allocations for development in the Green Belt. This level of public response has led all three Councils (Hertsmere, Dacorum and Three Rivers) to defer progress on the preparation of their Local Plans pending further consideration of proposals.

40. For this proposal the Applicant asserts in their consultant’s PDAS that “There were very few responses received during the Public Consultation that raised any objections to the proposals (sic)”(Para 3.3.3). Setting aside the inadequacy of the consultation exercise, which was largely online apart for a single leaflet to immediate neighbours of the site, this is patently untrue as the number of comments objecting to the original planning application clearly demonstrates.

Landscape, visual and amenity impacts

41. A critical concern for local communities and the wider public is the potential impact on the rural landscape, both in terms of visual and spatial impact and the loss of amenity. The importance of open countryside has been constantly emphasised throughout the recent pandemic and lockdowns and the amenity of local communities will also be seriously harmed in Little Heath Lane, Sugar Lane, the village of Bourne End, the western edges of Hemel Hempstead especially at Fields End, and the eastern edge of Berkhamsted in the Hall Park estate.

42. The value to health and well-being of enjoying quiet green spaces with plenty of trees and vegetation has become increasingly recognised and 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 and the publicly accessible land of the Box Moor Trust.

43. CPRE Hertfordshire considers that the factors affecting landscape impact relate to the Green Belt consideration of openness. We support fully the analysis by Dacorum Borough Council leading to the reasons for refusal with regard to landscape impact and particularly the Council's assessment that there will be harmful effects even after fifteen years of the installation, and, we would suggest, beyond.

44. The proposed site is a particularly poor site for a solar installation as it contravenes the guidance of PPG as noted above, and also guidelines adopted and publicised by Solar Energy UK (the solar energy industry trade association) with regard to reducing impact on undulating sites. Solar Energy UK guidance is contained in "11 Commitments on Solar Farms" (2022), under the heading "Respect for Landscape, Local Heritage and Access":
"Sites should aim to avoid high levels of visual impact and seek to maintain and enhance the natural beauty of the landscapes... Flat landscapes are best for PV projects, well screened by hedges and treelines and not unduly impacting nearby domestic properties or roads." (solarenergyuk.org, undated)

45. 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 characteristics and sensitivities" (PDAS Para 4.3.5). This is clearly nonsense, and a key concern is also the cumulative impact of ten ground-mounted solar installations planned throughout Hertfordshire and the recent increasing number of major applications for both housing and ground-mounted solar generation which comprise a major threat to open countryside.

46. The Applicant notes that the proposal will be a temporary development for a period of 40 years. We strongly disagree with the assertion that 40 years can be considered temporary development and it will be considered as permanent by those experiencing it. Landscapes can change significantly over a 30-year period (which is the same length as a generation) and it is never likely to be able to be reinstated to its original form.

47. It may be noted that, in the recent appeal decision in respect of Land north west of Hall Farm, Church Street, Alfreton (APP/M1005/W/22/3299953), the Inspector noted: "I consider that 40 years is a very significant period in people's lives during which the development would seriously detract from landscape character and visual amenity". CPRE Hertfordshire agrees with this statement.

48. The Landscape Visual Assessment (LVA) conducted by the Applicant concluded that there was no inter-visibility between the Chilterns AONB and the site, which ignores the significance of its setting. We fully support the Chilterns Conservation Board objection on the grounds of harm to the setting of the AONB by virtue of the scale of the proposal.

Public Rights of Way (PROWs) and community use

49. As is clearly apparent due to the public response to this application, the area to the south of the site is used extensively by walkers and the local communities for recreational purposes, and the proposed development will be highly visible over a wide area and from public rights of way (PROWs). The extensive security fencing, metal buildings, and associated infrastructure will be visually intrusive and will affect how the qualities of the site are perceived during the changing seasons, reflected in the growing and harvesting of the arable crops. The views of the site from the south contribute greatly to the enjoyment of the users of the PROWs nearby.

50. A number of public rights of way, including the route of the Hertfordshire Way, run up the southern side of the valley. In addition the Hertfordshire Way, although now diverted away from the former stretch between Potten End and the Grand Union Canal, formerly ran along Little Heath Lane and above the site, to the northwest and north. The older editions of the guidebook to the Way and OS mapping still show this route and it is highly likely that some of those walking the Way are still following the old route.

51. We support fully the objections raised by the Friends of the Hertfordshire Way on the grounds of the harm caused for walkers and other users. We note, as do others, the damage to wide-ranging views from PROWs to the south of the site which include Sugar Lane (reference UCR1), the route north of Sugar Lane (reference UCR2), the public footpath Bovingdon 23, and the publicly accessible Box Moor Trust land.

52. These views are quoted by the Applicant as being affected but then dismissed as irrelevant and we challenge directly such assertions. The suggestion by the Applicant that there will be no intervisibility between the Chilterns AONB and the proposed site is also clearly incorrect.

53. The presence of existing and planned development nearby is also quoted as affecting the amenity quality of existing open countryside (PDAS, para 10.6.8 seq.). We regard this as disingenuous as local communities and residents are highly concerned by the cumulative impacts of all intrusions into the countryside; as noted by very many residents and objectors.

54. The ongoing maintenance of the solar installation site can be expected to have a substantial impact on the users of the PROWs near the site. This will also affect nearby residential properties especially in respect of noise from mowers or strimmers.

55. Continuous noise will be emitted by the inverters and transformers associated with ground-mounted solar installations, and also by cooling fans attached to transformers. The potential of noise impact on users of the nearby PROWs and residents of Little Heath Lane and Bourne End should be properly assessed.

56. The impact of noise will be twofold. Firstly, the enjoyment of the public rights of way nearby will be further diminished. Secondly, the presence of the noise will serve to

reinforce the alien use of this countryside Green Belt land and make the site feel enclosed which is the antithesis of the openness which should be protected in the Green Belt.

Agricultural use

57. The present use of the land for agriculture should be maintained, especially in the Green Belt. The Applicant indicates that the land affected has been subject to a survey which determined that it is agricultural Grade 3b. This may be seen as a material planning consideration which falls against permitting the proposal, as Grade 3b is recognised as being moderate quality agricultural land capable of producing moderate yields.

58. CPRE Hertfordshire considers that given the size, scale and duration of this scheme, there should be a full detailed survey of the land affected to determine its true quality and potential use for agriculture, as it may be that portions of the land may be categorised as Best and Most Versatile (BMV). As it is, the Applicant's Agricultural Land Classification report found that 15% of the sample points were Grade 3a.

59. The main reasons in the report given for the 3b assessment were stoniness and slope, not fertility. The site is typical of many in the Chilterns and immediately adjoining areas which grow good arable crops. The CPRE national office has recently published a key report entitled "Building on our food security"(July 2022) which identifies the dangers in losing BMV agricultural land and the requirement to balance the competing needs of renewable energy and food security.

60. Increasing attention is being paid to the issue of food security and the need to use agricultural land for food production. 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.

61. The proposal will permanently change the use of the land as the potential for soil leaching post disassembly of the solar farm will be high and realistically, the site is unlikely to be restored to its original use. This therefore directly links to the issue of permanence which is an intrinsic characteristic of the Green Belt to be protected in perpetuity.

Impact on wildlife

62. Notwithstanding our preference for maintaining the agricultural use of appropriate land, CPRE Hertfordshire recognises that taking land out of agricultural use can have benefits for wildlife in those cases where the monoculture of crops is removed, allowing an element of biodiversity. The absence of ploughing increases the earth worm population and insects to flourish where grass is left to grow but these advantages are directly compromised by the damage to traditional habitats through development of the industrial plant and infrastructure associated with solar energy generation.

63. Security fencing surrounding large areas of land remove traditional pathways for transitory animals and bird deaths are a common occurrence as large areas of glazing are mistaken for water. Grass has to be mown and the land is essentially changed from rural to

industrial use; chemicals will inevitably be used to control weeds and pests, and habitats and the nature of local wildlife is consequently altered.

64. Contrary to the Applicant's assertions, the 40 year timeframe proposed 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.

65. Large ground-mounted solar installations inevitably destroy wildlife corridors and nesting and feeding habitats especially of ground nesting birds such as skylarks and lapwings. Once gone, such habitats cannot be easily recovered.

66. Recent legislation such as the Environment Act emphasises the importance of maintaining and enhancing biodiversity. CPRE Hertfordshire supports fully the interested party submission of Mrs Elizabeth Hamilton regarding the significance of biodiversity issues, as well as the inadequacy of the ecological surveys carried out at the site

Solar energy options

67. Cumulatively, photo-voltaic (PV) panels can make a significant contribution to our electricity supply and much more should be done at the planning application stage to ensure that appropriate roof-top panels are built-in to existing and proposed large commercial and agricultural buildings, as well as on public and community buildings and on top of car-parks. Previously developed land also offers more suitable opportunities for ground-mounted installations.

68. CPRE Hertfordshire supports fully the national CPRE campaign for the promotion of roof-mounted installation as an alternative to the use of open countryside. The Government has estimated that there are currently 250,000 hectares (approx. 625,000 acres) of south-facing commercial roofs in the UK (Part 2 of the Government's UK Solar PV Strategy).

69. CPRE Hertfordshire recognises that PV generation on buildings is the area where the most rapid technological advances, such as thin-film PV and PV tiling, are being made which provide more efficient roof-top energy generation. We believe that solar energy generation should be an integral part of existing and all new house and commercial property construction as an alternative to ground-mounted installations.

70. Roof-top PV associated with buildings has the added benefit of providing generation at the point of use, thereby reducing transmission and distribution losses, and the impact of associated infrastructure. Local authorities can support roof-top PV generation through planning conditions to mandate it on new build and major refurbishments, where practicable.

Cumulative impact

71. CPRE Hertfordshire acknowledges that each planning application will be decided on its own merits. However, as important context to the current appeal we are aware of nine further large-scale ground-mounted solar installations being proposed within the County, which together would have devastating impacts on large areas of open, and often protected, countryside.

72. We would suggest that the present system of consideration of individual planning applications, initially by Local Planning Authorities, is entirely inadequate to assess the overall implications identified in this submission. CPRE Hertfordshire believes that a broader approach to the assessment of impacts may be required to ensure that the cumulative effects of proposals are adequately taken into account.

Decommissioning and disposal

73. A significant concern relates to the eventual decommissioning and disposal of the panels and associated equipment at the end of any temporary grant of permission. We have already noted (see paras 19/ 20 above) the Draft National Policy Statement which indicates a life for solar panels of substantially less than 40 years.

74. Solar panels reduce in effectiveness over their life, as well as requiring constant maintenance, and there is no indication in the Applicant's Statement of measures to remove the installation and reinstate the land to agricultural use. This is a serious omission in the application and renders it inadequate to be considered.

Summary and conclusions

75. This Inquiry relates to the installation of a new solar farm capable of producing 25 MW on 32 hectares of open countryside. This Statement has dealt with the impacts of the installation on the open countryside and rural communities which become even more severe when the land proposed for development is designated as Green Belt.

76. CPRE Hertfordshire notes that in principle designated protected land should not be used for development which is highly damaging to the countryside and landscape character. We do not agree that "very special circumstances" have been demonstrated to allow inappropriate development in the Green Belt. Solar farms are not locationally constrained and in our view should not be located in designated protected areas.

77. We note the Government's position on protection of the Green Belt specifically, which is strengthening through recent Ministerial statements. Public responses to Local Plan consultations, including Dacorum's have been record-breaking and related to concerns about Green Belt protection.

78. Landscape, visual and amenity impacts are highly significant, and the intrinsic value of the countryside for health and well-being is apparent. There is no mitigation possible for the damaging visual impact of protected landscape views lost for a generation.

79. The public response to this application demonstrates the importance of this countryside to local communities and visitors. 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.

80. The proposed development will cause definitional harm. It would introduce new built development across the appeal site, removing entirely the openness of that land to replace it with industrial type structures which are out of place, incongruous and alien. It will conflict with a number of the purposes of the Green Belt, causing urban sprawl, reducing existing Green Belt areas between settlements, impacting the setting of the Chilterns AONB and encroaching very substantially into the countryside.

81. 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 the primary locations for solar energy generation and we urge the dismissal of this Appeal.

CB

July 2023