



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

Peter Bull
Planning and Building Control
North Herts Council
PO Box 10613
Nottingham
NG6 6DW

Our Ref:

Your Ref:

6th March 2024 (by email)

Dear Peter Bull,

Application no. 22/00741/FP

Land West of Ashwell Road, Bygrave SG7 5EB

**AMENDMENTS: Ground mounted solar photovoltaic (PV) farm including battery energy storage; continued agricultural use, ancillary infrastructure, security fencing, landscaping provision, ecological enhancements and associated works
(as amended by information received 29 January 2024)**

I write with regard to the above application to which CPRE Hertfordshire has previously responded by letter of 11th May 2022. That letter set out our detailed objection to this inappropriate proposed development in the Rural Area Beyond the Green Belt (RABGB) as identified in the adopted North Herts District Local Plan (Policy SP5 Countryside and Green Belt) and we continue to object strongly on a similar basis to both the principle of the development and subsequent amendments.

We note that various amendments have been made by the applicant and their consultants, most recently by Third Revolution Projects on 29th January 2024 including matters relating to planning policy, ecology, access, noise impact, fire and other specific concerns raised previously by the Bygrave Action Group and Councillor Tyson. CPRE Hertfordshire continues to support the concerns raised by these parties and believes them to be inadequately addressed in the Third Revolution Projects response.

CPRE Hertfordshire notes also the recent comprehensive response of Bygrave Parish Council which identifies significant short-comings in the planning application to which the Parish Council seeks more detailed responses. We also note and support the specific request by Mr James Colgrave of the Bygrave Action Group regarding the potential involvement of the Hertfordshire Fire and Rescue Service in the light of recent concerns raised locally and elsewhere relating to fire safety matters.

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

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We further note the comprehensive response of Ashwell Parish Council and support particularly their concerns relating to landscape character and visual impact, impact on users of the Icknield Way, noise and light pollution. In addition to the above matters we reiterate our primary concerns as previously:

1. Strategic Policy SP5 Countryside and the Green Belt, in the adopted 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.
2. 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.
3. 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.
4. 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 schedule monuments of Arbury Banks, this will further increase the visibility and impact of this proposal to an unacceptable extent.
5. 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.

6. 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 note that the Hertfordshire Fire and Rescue Service has not been consulted on this application.
7. 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.
8. The Applicant asserts that agricultural uses of the land can be continued during its temporary use as a solar installation. 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.
9. CPRE Hertfordshire reiterates its support for renewable energy and CPRE campaigns actively both locally and nationally for previously developed land and roof-mounted solar generation as alternatives to the use of designated and highly valued open countryside. We urge the Council to refuse permission for this damaging proposal.

Yours sincerely,

Chris Berry
Planning Manager

NOTE: We would request that this letter is published on the Council's website as a document relating to this application and should be grateful if you would notify us of the date of the appropriate meeting if it is to be determined by planning committee.