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**Standing up for Hertfordshire's countryside**

Amit Patel  
Development Management  
East Herts Council  
Wallfields  
Pegs Lane  
Hertford SG13 8EQ

Our Ref:

Your Ref:

4<sup>th</sup> September 2024 (by email)

Dear Amit Patel,

**Application no. 3/24/1275/FUL**

**Land to the West of Ware, Ware Park Farm, Ware SG12 0DU**

**Construction and operation of a circa 24MW (AC) solar farm development with a (Battery Energy Storage System) BESS, and associated infrastructure**

I write to register CPRE Hertfordshire's objection to the installation of the above solar installation, 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, however, if not properly controlled, can have serious consequences for our natural environment and we object to this proposal for the following reasons.

1. The site is designated as London Metropolitan Green Belt in the adopted East Herts District Plan and serving several of its purposes as identified in the National Planning Policy Framework (NPPF). The site performs an important function as open countryside, both for agriculture and the significant enjoyment of views and landscape, and the conservation and enhancement of the natural environment.
2. The 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.
3. CPRE Hertfordshire objects to the application on grounds related to our objectives as an organisation committed to protecting rural landscapes and activities. This proposal effectively industrialises the landscape in the area, covering it with glass and metal panels and associated infrastructure.
4. 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

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**CPRE Hertfordshire is a Charitable Incorporated Organisation**

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

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than open countryside, in accordance with the aims of Government policy. The Applicant acknowledges that “very special circumstances” need to be demonstrated sufficient to clearly outweigh harm to the Green Belt and we do not agree that the proposals would not compromise the objectives of the Green Belt.

5. 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. 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.
6. Notwithstanding the ongoing public consultation on proposed changes to national planning guidance, it is clear that the Government’s intention is to retain the Green Belt largely 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.
7. 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.
8. Significant noise will be emitted by the inverters and transformers associated with ground-mounted solar installations, and also by cooling fans attached to transformers. 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.
9. 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 Best and Most Versatile agricultural land Grades 2 and 3a. This should be seen as a material planning consideration which counts against permitting the proposal.
10. Increasing attention is being paid to the issue of UK domestic food security and the need to use agricultural land for food production. The proposal will permanently change the use of the land as the potential for deterioration of soil quality 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.
11. 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. However, any such advantages are directly compromised by the damage to traditional habitats through development of the industrial plant and infrastructure associated with solar energy generation.

12. The 40 year timeframe proposed for the installation is also not temporary for wildlife. 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.
13. 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, chemicals will inevitably be used to control weeds and pests, and habitats and the nature of local wildlife is consequently altered. Small mammals get trapped in the fencing, and pollinators and other insects have their habitats compromised by extensive areas of solar panels.
14. CPRE Hertfordshire acknowledges that each planning application will be decided on its own merits. However, we are aware of ten 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.
15. We 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 is required to ensure that the cumulative effects of proposals are adequately taken into account.

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.