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Standing up for Hertfordshire's countryside

Ben Glover  
Planning and Building Control  
North Herts Council  
PO Box 10613  
Nottingham  
NG6 6DW

Our Ref:

Your Ref:

29<sup>th</sup> November 2024 (By email)

Dear Ben Glover,

**Application: 24/02455/FP**  
**Land Opposite Wymondley Grid Station 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, a re-submission of the previously refused application reference 22/00709/FP, 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 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. 142) and "inappropriate development should not be approved except in very special circumstances" (para. 152).
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 40 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. The present application is virtually identical to the previous submission, simply removing approximately 9% of the total area of solar panels, and the Applicant seeks to justify the proposal by virtue of changing circumstances regarding the provision of renewable energy. We regard this as a negligible amendment which does nothing to reduce the detrimental impacts of the proposed development.

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: Peter Waine

Registered Charity 1162419

CPRE Patron: His Majesty The King



4. 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. 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.
5. 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.
6. 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.
7. 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. We support fully the detailed objection raised by Natural England with regard to NPPF (Paragraph 180 seq. and footnotes) and Planning Practice Guidance direction on the avoidance of the loss of productive agricultural land.
8. Notwithstanding that the application as being for a temporary use for 40 years, we believe this should be regarded as effectively permanent with regard to the impacts on agricultural production, and wildlife. The installation of the panels and associated infrastructure will have a lasting effect on the ground which will be exacerbated by the eventual removal of the installation, if this occurs.
9. The Applicants, in their Planning Design and Access Statement, seek to assert that circumstances have changed since the previous application for solar generation in this area 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. CPRE Hertfordshire supports fully the potential objection raised by Natural England (NE) with regard to the impact of the planned extension of the Chilterns National Landscape. NE notes that the site may include land which meets the criteria for a National Landscape and this may constitute a material planning consideration for the application and public consultation on this matter is planned for early 2025.
13. A key concern which also 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.
14. 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.

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.