



Nabeel Kasmani
Planning and Building Control
St. Albans City and District Council
Civic Centre, St. Peter's Street
St. Albans
Herts AL1 3JE

Our Ref:

Your Ref:

6th August 2025 (by email)

Dear Nabeel Kasmani,

Planning application no. 5/2025/1132

Proposed Solar Farm, Potters Crouch

Construction, operation and subsequent decommissioning of a solar farm, comprising ground mounted solar photovoltaics (PV), together with associated infrastructure including inverters, transformers, cabling, CCTV, fencing, access tracks and landscaping

I write with regard to the above planning application to which CPRE Hertfordshire objects for the following reasons.

1. The land identified for this proposed development is designated as London Metropolitan Green Belt in the adopted St Albans City and District Local Plan Review where development is inappropriate unless very special circumstances are identified which clearly outweigh the harms caused, according to criteria in the National Planning Policy Framework (NPPF).
2. CPRE Hertfordshire is fully supportive of the Government's objectives towards the achievement of net zero emissions by 2050 and the promotion of all forms of renewable energy generation. In principle however, land covered by statutory designation, in this case Green Belt, should not be used for development which is highly damaging to the landscape and rural character, effectively industrialising the landscape in the area which would be covered by glass and metal panels and associated infrastructure.
3. The land is presently arable farm-land, and although electricity lines and pylons are present, these are commonly encountered in rural areas. The proposed development almost entirely surrounds the hamlet of Potters Crouch, severely diminishing the amenity of this small community on the edge of St Albans, as recognised by the Applicant's consultants in the Planning Design and Access Statement (PDAS) and noted by the Council in its pre-application advice.



4. Further, the site is sloping and will be highly visible from the adjoining M1 motorway. Advice issued by Solar Energy UK solar generation industry (www.solarenergyuk.org) recommends that undulating sites are avoided due to the visual impact of the panels and associated buildings and infrastructure.
5. The proposed development comprises the installation of approximately 100,000 solar panels up to 3.1 metres above ground level at their high end, twenty seven inverter and transformer buildings up to 3 metres high. Together with cable connection compounds and substation the installation and associated infrastructure will jeopardise seriously the rural character of the area.
6. The impact will be further increased by 2.5 metre-high boundary deer fencing comprising galvanised mesh on wooden posts, incorporating 3 metre high CCTV poles and access tracks across the site. The ongoing maintenance of the solar installation site can be expected to have a substantial impact on the users of the Public Rights of Way (PROWs) crossing and adjoining the site and the residents of surrounding settlements.

Community use and amenity

7. Public enjoyment of the area is entirely informal, and this would be prejudiced by the continuous noise emitted by the inverters and transformers associated with ground-mounted solar installations, and also by cooling fans attached to transformers. The extensive security fencing and associated infrastructure will be visually intrusive, particularly at close quarters, especially where footpaths cross fields and where it is proposed to provide security fencing to both sides.
8. The Applicant's consultants note five PROWs adjoining and crossing the site. Views both within and beyond the site contribute to the enjoyment of the users of the PROWs. Local users will be affected detrimentally by the installation of thousands of solar panels, buildings and fencing and ground-mounted solar energy installations should not be sited where they are directly overlooked by housing or where they would detract from important views.

Wildlife and biodiversity

9. Notwithstanding our preference for maintaining the agricultural use of appropriate land, we recognise 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.

10. 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 are used to control weeds and pests and habitats and the nature of local wildlife is consequently altered.
11. Large ground-mounted solar installations inevitably destroy wildlife corridors and nesting and feeding habitats especially of ground nesting birds such as larks and lapwings. Once gone, such habitats cannot be easily recovered.

Heritage impact

12. The hamlet of Potters Crouch is designated as a Conservation Area containing significant Grade II Listed Buildings. The proposed development, in surrounding the Conservation Area will severely prejudice its setting and lead to a deterioration in the benefit from the surroundings.
13. Specific note should be taken of Conservation Area Character Statement for Potters Crouch, Section 6.0 Significant Views:
“Much of the character of the Potters Crouch conservation area comes from its rural situation and its views out across open fields and countryside.”
The Summary further notes:
“It is the Council’s policy to encourage the retention of those features which make the conservation area special; including historic buildings, their historic and architectural features and their settings, including trees, hedges and verges. Every effort should be made to maintain landscape features, including spaces between buildings, as well as trees and hedgerows to avoiding infilling gaps and losing the sense of openness and rural quality of the area.”

Grey belt

14. A principal justification for the location of the solar installation is the concept of grey belt introduced by the revised NPPF. The Applicant’s consultants devote a separate accompanying document entitled Site Specific Grey Belt Assessment to this matter, most of which repeats material presented in the Planning Design and Access Statement without further elaboration.



15. The relevant Sections 3, 4 and 5 present a methodology to argue for the site to be identified as grey belt based primarily on denying that the site makes any contribution to the three purposes that are permitted to be used to demonstrate that development would be inappropriate. This follows the now frequent pattern of recent applications in the Green Belt, arguing similarly that the revised National Planning Policy Framework (NPPF) has changed the basis for their determination and indicating that the three purposes a), b) and d) noted in paragraph 143 are not sufficient to prevent the granting of permission.
16. CPRE Hertfordshire strongly opposes this interpretation of the grey belt and the illogicality of the revised NPPF supporting five purposes of the Green Belt (para 143) and then only permitting three purposes to be considered in applications (NPPF Glossary definition). In our view, the proposed development would clearly constitute a breach of the first and third purposes of the Green Belt as identified in the NPPF (paragraph 143) to prevent urban sprawl beyond the built-up area, and encroachment on open countryside. It is a clear and substantial urban extension south of the large built-up area of St Albans, providing “strong reason” required to refuse permission for development as noted in the NPPF footnote 7.
17. The Applicant’s consultants also refer to the Green Belt Review undertaken to inform the emerging Local Plan and note the conclusion with regard to Site GB25 that “Assessed in isolation the land makes a limited or no contribution towards all Green Belt purposes”. This is in contrast to the Review Assessment for the same site indicating “significant contribution(s)” to purposes c) and e) and “partial contribution(s) to purposes b) and d) of the Green Belt as stated in the NPPF paragraph 143.
18. CPRE Hertfordshire believes that considering the site “in isolation” is profoundly misguided with regard to its use for a large-scale activity which will have an impact over a wide area and prejudice the coherence of the Green Belt in this part of south Hertfordshire. The promotion of the grey belt for extensive areas of open agricultural land, as in this case, is entirely inappropriate and CPRE is seeking clarification of the purpose and function of the grey belt in the light of its increasingly indiscriminate use as a justification for planning applications in the Green Belt.

Cumulative impact

19. CPRE Hertfordshire acknowledges that each planning application will be decided on its own merits. However, as important context to the current appeal CPRE Hertfordshire is aware of at least ten further large-scale ground-mounted solar installations within the County.



20. Taken together, these will have devastating impacts on large areas of open countryside. We would suggest that the present system of consideration of individual planning applications 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.

Solar energy options

21. Cumulatively, photo-voltaic (PV) panels can make a significant contribution to our electricity supply but much more should be done at the planning application stage to promote appropriate roof-top energy generation on domestic, commercial and agricultural buildings, as well as on public and community buildings.
22. 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.
23. The Green Belt in south Hertfordshire is under continuous and unrelenting pressure for development which is jeopardising the highly valued benefits which protection brings. Its continual reduction through consents for speculative development is in danger of bringing the planning system into disrepute and we urge the Council to refuse permission for this inappropriate development.

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.