



The countryside charity
Hertfordshire

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Standing up for Hertfordshire's countryside

Joanna Russell
Development Management
East Herts District Council
Wallfields
Pegs Lane
Hertford SG13 8EQ

Our Ref:

Your Ref:

26th September 2025 (By email)

Dear Joanna Russell,

Planning application no. 3/25/0950/FUL
Land at Aston End, Stevenage
Installation of 480 Photovoltaic Solar Panels, with an output of circa 240,000kWh
of energy, with supporting infrastructure and landscaping works

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 East Herts District Plan 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. Notwithstanding the relatively limited nature of the proposed development, and cognisant of the Applicant's commitment to environmental concerns, the proposed development would have a seriously detrimental impact on the landscape quality and rural character of the Beane Valley. The site is sloping and highly visible and 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.

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, OBE
Registered Charity 1162419
CPRE Patron: His Majesty The King



4. 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.
5. The Applicant's consultants assert that the site should be regarded as grey belt, as introduced by the revised NPPF. The Applicant's consultants present an argument for 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.
6. 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). The Government, in the revised NPPF, has continued its commitment to all five purposes of the Green Belt (as identified in para 143) and this proposed development clearly infringes on the third purpose, constituting significant encroachment onto open countryside, and providing the strong reason for refusal as noted in the NPPF footnote 7.
7. The promotion of grey belt policy to justify development on extensive areas of open agricultural land, as in this case, is entirely inappropriate. 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.
8. CPRE Hertfordshire acknowledges that each planning application will be decided on its own merits. However, as important context to the current application CPRE Hertfordshire is aware of at least fourteen further large-scale ground-mounted solar installations within the County.
9. 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.



10. 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.
11. In summary, the Green Belt in 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.