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Standing up for Hertfordshire's countryside

Lisa Page
Planning and Building Control
Hertsmere Borough Council
Civic Offices, Elstree Way
Borehamwood
Herts. WD6 1WA

Our Ref:

Your Ref:

3rd September 2025 (by email)

Dear Lisa Page,

Planning application no. 25/1023/FUL

Land North of Earls Lane, South Mimms

Construction of a solar farm (temporary for 40 years) with access off Earls Lane. Proposal would include the installation of solar photovoltaic panels to generate electricity (a 30 MW installation), with ancillary substations, inverters, perimeter stock fencing with CCTV, landscaping and other associated works.

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

1. The site is located in land designated by the adopted Hertsmere Core Strategy as Green Belt where development is regarded as inappropriate unless very special circumstances can be demonstrated according to criteria in the National Planning Policy Framework (NPPF).
2. The Planning Access and Design Statement prepared by consultants for the developer notes in paragraph 2.2 that "The site is relatively undesignated." This is wrong as the land is clearly identified as Green Belt and is classified as Best and Most Versatile land according to DEFRA.
3. 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, high quality agricultural land covered by Green Belt policy should not be used for development which effectively industrialises the landscape by covering it with glass and metal panels and associated 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. No detailed specification is provided of the number of solar panels or associated infrastructure. Panels are likely to be up to 3.5 metres above ground level together with an unspecified number of inverter buildings, transformer buildings, concrete hard-standings, storage enclosures and substation. Typically, the impact will be further increased by boundary fencing comprising galvanised mesh on wooden posts, incorporating 3.5 metre high CCTV poles.
5. Public enjoyment of the area and public rights of way would be prejudiced by the panel arrays and continuous noise emitted by the inverters and transformers associated with ground-mounted solar installations. The ongoing maintenance of the site can be expected to have a substantial impact on the residents of surrounding settlements.
6. The Appellant indicates that the land affected is categorised as Best and Most Versatile (BMV) land for agriculture and there should be a full detailed survey of the land affected to determine its true quality and potential use for agriculture. CPRE Hertfordshire believes that the present use of the land for agriculture should be maintained in line with NPPF paragraph 187 b) and footnote 65 whereby planning decisions should recognise the 'economic and other benefits of the best and most versatile agricultural land'.
7. CPRE published a key report in 2022 entitled "Building on our food security" (July 2022) which identifies the dangers in losing BMV agricultural land and the requirement to balance the competing needs of renewable energy and food security. Increasing attention is being paid to the issue of food security and the need to use agricultural land for food production.
8. It is noteworthy that virtually every major planning application for residential and commercial development within the Green Belt in Hertfordshire made since the publication of the revised NPPF on 12th December 2024 has identified the site as grey belt, notwithstanding the quality and character of the landscape or local conditions in each case. This is clearly an unsustainable position and it is becoming increasingly clear that the existing definitions and guidance on grey belt are entirely inadequate to prevent the wholesale removal of highly valued and significant Green Belt protections.
9. It is self-evident that identification of extensive areas of open countryside for large solar arrays and associated infrastructure as grey belt is extending the definition to an unacceptable degree. The proposed development would clearly constitute a breach of the third purpose of the Green Belt as identified in the NPPF (paragraph 143) to prevent encroachment onto open countryside.



10. We entirely oppose any contention this is not relevant to the local conditions affected by this application. CPRE is campaigning vigorously both nationally and locally against the illogicality of not including all the purposes of the Green Belt when considering whether grey belt criteria apply in each case.
11. 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 twelve further large-scale ground-mounted solar installations being promoted within the County and specifically extensive residential proposals and a massive data centre planned to the south of Potters Bar.
12. Taken together, these proposals will have devastating impacts on large areas of open countryside. The present system of consideration of individual planning applications is entirely inadequate to assess the overall impacts of multiple large-scale applications which have a detrimental impact on the countryside and we urge the Council to refuse permission for this proposed 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.