



Carl Griffiths
Development Management
Welwyn Hatfield Borough Council
The Campus
Welwyn Garden City
Herts. AL8 6AE

Our Ref:

Your Ref:

26th September 2025 (by email)

Dear Carl Griffiths,

**Planning application no. 6/2025/1458/MAJ
Land at Tollgate Farm, Welham Green, AL4 0NY
Erection of a solar farm with a capacity of 16MW comprising solar PV panels
and ancillary development.**

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 Welwyn Hatfield Local 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. The proposed development comprises the installation of an unspecified number of solar panels which are typically up to 3.5 metres above ground level at their high end, four power station and substation buildings 3 metres high, and an unspecified number of inverters and transformers. The impact will be further increased by boundary deer fencing, hard-standings and access roads
4. Two Public Rights of Way (PROWs) cross the site and footpaths run along the northern boundary providing public access. Views both within and beyond the site contribute to the enjoyment of users of the PROWs which will be prejudiced by the presence of the



solar panels and continuous noise emitted by the inverters and transformers associated with ground-mounted solar installations, and also by cooling fans attached to transformers.

5. The ongoing maintenance of the solar installation can be expected to have a substantial impact on the users of the PROWs crossing and adjoining the site and the residents of surrounding settlements. Grass and hedges as well as the equipment will require constant and regular maintenance which cause additional nuisance.
6. We believe that the present use of the land for agriculture should be maintained. The Applicant's Agricultural Land Classification Survey Report notes that 90% of the site is categorised as Best and Most Versatile (BMV) land for agriculture. CPRE has recently published a key report 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.
7. Large ground-mounted solar installations inevitably destroy wildlife corridors and nesting and feeding habitats especially of ground nesting birds such as larks and lapwings. Security fencing surrounding large areas of land removes 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. Once gone, such habitats cannot be easily recovered.
8. 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.
9. 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.

10. The promotion of the 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.
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 fourteen further large-scale ground-mounted solar installations within the County.
12. 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.
13. 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.
14. 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.