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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:

1st October 2025 (by email)

Dear Ben Glover,

**Planning application no. 25/01947/FP
Land South of A507 near Cumberlow Green, Clothall Road, Clothall
Battery Energy Storage System (BESS), ground mounted solar farm,
associated infrastructure, access and landscaping**

I write with regard to the above major planning application for an extensive solar energy installation to which CPRE Hertfordshire strongly objects for the following reasons.

1. The site, totalling nearly 200 (187.3) hectares, comprises land which is partly designated as Green Belt in the adopted North Herts Local Plan where development is regarded as inappropriate unless very special circumstances can be demonstrated, and partly as land covered by Local Plan Policies SP5 and CGHB1 relating to Rural Area beyond the Green Belt. 22% of the site area is within the Green Belt and the Applicant asserts that this is grey belt within the definition provided by the revised National Planning Policy Framework (NPPF, Dec 2024).

Policy concerns

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 magnitude of the proposed development, which should be considered together with the immediately adjacent proposed solar installation presently being considered by East Herts and North Herts Councils, is such that the impacts on the countryside are unreasonable and unacceptable in a settled rural agricultural landscape. With regard to the Green Belt portion of the site, the Applicant presents a methodology to argue

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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.

4. 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. CPRE Hertfordshire strongly opposes this interpretation of the grey belt which goes far beyond the exceptional nature of the original intention and shows 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).
5. With regard to the adopted Local Plan designation of Rural Area beyond the Green Belt, Policy CGB1 states that development should not harm the rural character of the landscape. It lists certain circumstances where limited development may occur but this proposal does not comply with any of the exceptions permitted and this proposal would introduce development which is deeply injurious to the rural character of the area.
6. The proposed development is also in conflict with Paragraph 187b) of the National Planning Policy Framework (NPPF) which states that:
"Planning policies and decisions should contribute to and enhance the natural and local environment by:b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services..."

Site and development characteristics

7. It is clear that the land affected has a particularly rural character. The land is primarily arable farm-land, and although electricity lines and pylons are present, these are commonly encountered in rural areas.
8. The land is free from traffic and other noise and there are long views of undulating land framed by trees, hedges and woodland within and beyond the site boundaries, contributing to the essentially rural feel. The site is accessible via two significant Public Rights of Way (PROWs 019 and 020) and byways which cross and adjoin the site from the many surrounding settlements including Cromer, Cottered and Clothall. The North Herts Local Plan considers PROWs as integral to the provision of green infrastructure which should not be isolated or degraded.



9. The proposed development comprises the installation of an unspecified number of solar panels up to 3 metres above ground level at their high end, and an unspecified number of transformer, inverter and control buildings on concrete hard-standings. There would also be a substation compound and large BESS installation of 7 hectares with 4 metre high fencing and associated access roads.
10. The impact will be further increased by high boundary deer fencing, comprising galvanised mesh on wooden posts, incorporating high CCTV poles and inevitable lighting. The rural qualities and public enjoyment of the site would be seriously jeopardised by the thousands of 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.
11. The ongoing maintenance of the solar installation site 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.

Agricultural use

12. CPRE Hertfordshire believes that the present use of the land for agriculture should be maintained. The Appellant indicates that 38% of the land affected is categorised as Best and Most Versatile (BMV) land for agriculture and the remainder has been in continuous agricultural use.
13. CPRE has recently published a key report entitled “Building on our food security” (July 2022) which identifies the dangers in losing 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.

Public rights of way

14. As already noted, the site proposed for this development is crossed by Public Rights of Way (PROW) Clothall 019 and 020. Both these PROWs will be directly impacted by the proposal with the views from them seriously reduced by the magnitude of the proposal and to what would be effectively narrow alleyways between either fencing or hedging. A substantial part of the amenity enjoyed by these PROW is the views across open landscape.

Wildlife and biodiversity

15. 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.
16. However, 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 are consequently altered.
17. 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.

Solar energy options

18. Cumulatively, photo-voltaic (PV) panels can make a significant contribution to electricity supply but much more should be done through the planning process to promote appropriate roof-top energy generation on domestic, commercial and agricultural buildings, as well as on public and community buildings. 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.

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 fourteen further large-scale ground-mounted solar installations within the County.
20. The scale is both excessive and detrimental and would 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.

River Beane valley

21. A critical implication of the proposed development will be the impact on the upper reaches of the River Beane which is a globally recognised chalk stream with rare ecological significance. The disruption caused by construction and the ongoing operation of the solar installation will threaten the survival of the streams in the River Beane catchment.
22. The continued survival of the unique chalk stream environment in this area has been jeopardised by over-abstraction in the past. It is now recognised by the Upper Lea Catchment Partnership and Affinity Water amongst others, that urgent work needs to be undertaken to protect this rare ecosystem which is threatened by the proposed development.

In conclusion, CPRE Hertfordshire notes the very extensive range of concerns expressed by the local communities surrounding this proposed development who will be detrimentally affected. We support fully the submissions made by Walkern Parish Council and would urge the Council to refuse permission for this hugely damaging 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.