



Max Sanders
Planning and Building Control
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Hertfordshire
WD6 1WA

Our Ref:

Your Ref:

17th February 2021 (by email)

Dear Mr Sanders,

Application: 21/0050/FULEI
Land North of Butterfly Lane, Land Surrounding Hilfield Farm and
Land West of Hilfield Lane, Aldenham.

Full application for installation of renewable led energy generating station comprising ground-mounted photovoltaic solar arrays and battery-based electricity storage containers together with substation, inverter/transformer stations, site accesses, internal access tracks, security measures, access gates, other ancillary infrastructure, landscaping and biodiversity enhancements

I write with reference to the above application to register CPRE Hertfordshire's strong objection to the installation of this large solar farm, for the following reasons.

1. The land identified for this proposed development is located within the London Metropolitan Green Belt as identified in the Hertsmere Core Strategy 2013 and performs a vital function as open countryside, both for agriculture and recreation, and the conservation and enhancement of the natural environment. The National Planning Policy Framework (NPPF) as revised in February 2019 requires land designated as Green Belt to be kept "permanently open" (para. 133) and "inappropriate development should not be approved except in very special circumstances" (para. 143).
2. The applicant acknowledges in the Planning Statement accompanying the application that "very special circumstances" need to be demonstrated sufficient to outweigh harm to the Green Belt, and these are stated by the applicant to be related primarily to the benefits of provision of renewable energy, and the 35 year life of the proposed development. The industrial nature of the solar panels and associated infrastructure will however change the nature of the countryside in this area for a generation.
3. National Planning Policy Guidance also provides specific guidance on solar farms (para 13) and notes: "the deployment of large-scale solar farms can have a negative impact



on the rural environment, particularly in undulating landscapes.” The large extent of this proposal, 130 hectares, will make a very considerable impact on the area, by virtue of both the solar panels themselves, and the associated infrastructure.

4. Ministerial letters of November 2013 and April 2014 have stated that the need for renewable energy does not automatically override environmental protection and local authorities should ensure that proposals for solar farms are appropriately sited, and give proper weight to environmental considerations such as landscape. Solar farms are not locationally constrained as they require only direct sunlight and we do not accept that there are ‘very special circumstances’ for locating this proposal on land designated as Green Belt
5. The principle of openness is a key test for the maintenance of Green Belt, as emphasised in several court cases (including *Lea Valley Regional Park vs Epping Forest DC*; *Samuel Smith vs North Yorks County Council*) and this will be severely jeopardised by the fencing, transformers and other bulky and unsightly equipment associated with this proposal. The applicant accepts that this is a matter for the judgment of the Council in the determination of this application.
6. The present use of the land for agriculture should be maintained. Notwithstanding the applicant’s indication that the land affected is agricultural Grade 3b by virtue of soil wetness, this is only just below the classification of Best and Most Versatile (BMV) land in MAFF guidance. The Council should satisfy itself that the majority of the site does not fall into a potential BMV category that would provide further protection against inappropriate development, particularly if relatively minor improvements may be feasible.
7. As noted by very many consultees, the area is extensively used by walkers and the local communities for recreational purposes, and the proposed development will be highly visible over a wide area and from several public rights of way. The importance of open countryside has been constantly emphasised throughout the pandemic, and the beneficial aspects of maintaining such areas are likely to be increasingly recognised.

Yours sincerely,

Chris Berry
Planning Manager